



December 19, 2013

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Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 12-353, Comment Sought on the Technological Transition of the Nation's Communications Infrastructure; GN Docket No. 13-5, Technology Transitions Policy Task Force
Notice of *Ex Parte*

Dear Ms. Dortch:

Please pass on to the Technology Transitions Policy Task Forces the Benton Foundation's new paper ***The New Network Compact: Making the IP Transition Work for Vulnerable Communities.***

The report highlights the concerns of vulnerable communities through the eyes of the individuals and organizations who work on a daily basis with children, people with disabilities, low-income families, communities of color, rural residents and senior citizens. As the task force moves forward with their work, we offer this report to help clarify the struggles vulnerable populations face and also to identify principles and solutions to help them overcome the obstacles they face.

Today marks the 100th anniversary of the "Kingsbury Commitment", when the nation recognized that the public has a stake in telecommunications. One hundred years later, telecommunications and technology is still evolving yet the core public interest tenants identified in the "Kingsbury Commitment" is just as valid today.

We need a new network compact for the 21st century that guarantees that the public, not just industry, benefits from the migration to digital networks.

Benton's paper, which identifies 10 interrelated principles to help guide the transition to all-IP networks, challenges regulators to consider a wide array of vulnerable communities that could be unfairly disadvantaged during this conversion. Depending on how this transition is done, these communities stand to benefit immensely or be disproportionately harmed. Only by fully

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understanding the possible pitfalls and opportunities of such a change can the FCC develop a set of “rules of the road” that will best serve all of the country’s residents.

In accordance with Section 1.1206(b) of the Commission’s rules, this letter is being filed with your office. If you have any further questions, please contact me at

Respectfully submitted,
/s/ Amina Fazlullah
Director of Policy
BENTON FOUNDATION

Cc: Jonathan Sallet, Chairman Wheeler, Commissioners Mignon Clyburn, Jessica Rosensworcel, Ajit Pai, Michael O’Rielly