

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of	)	
	)	
Draft Eligible Services List for the	)	CC Docket No. 02-6
Schools and Libraries Universal Service	)	GN Docket No. 09-51
Program	)	WC Docket No. 13-184
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**REPLY COMMENTS OF GENERAL COMMUNICATION, INC.**

General Communication, Inc. (“GCI”) replies to the Wireline Competition Bureau Public Notice seeking comment on the draft eligible services list (“ESL”) for the Schools and Libraries Universal Service Program (“E-Rate”).<sup>1</sup> Alaska has seen first-hand the benefits of high-capacity, live, interactive distance learning and video conferencing. These services have become an essential part of educating students in rural Alaska, allowing children in remote communities to get an education that would not otherwise be available without leaving home. Unfortunately, the proposed ESL could create some confusion by its failure to explicitly list such services as Category One (previously Priority One) eligible services. To maintain that essential educational bridge, GCI urges the Bureau to clarify that distance learning video services remain eligible for funding under Category One.

Distance learning and video conferencing services form the core of broadband capacity use not only in rural Alaska, but in schools across the country. That reality is not reflected in the

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<sup>1</sup> *Wireline Competition Bureau Seeks Comment on Draft Eligible Services List for Schools and Libraries Universal Service Program*, CC Docket No. 02-6, GN Docket No. 09-51, WC Docket No. 13-184, Public Notice, DA 14-1130 (rel. Aug. 4, 2014).

proposed ESL and could lead to unnecessary confusion for schools, libraries, and service providers. The State E-Rate Coordinators Alliance (“SECA”), for instance, states that while the ESL “should explicitly note that web hosting, voice mail, and email will no longer be eligible,” in contrast, “the telecommunications component of distance learning/video conferencing services should be explicitly listed as eligible.”<sup>2</sup> Similarly, the State of North Carolina asserts that distance learning/video conferencing “should be explicitly listed as eligible, as should the circuits that carry these services.”<sup>3</sup> E-Rate Provider Services found the omission of distance learning/video conferencing services from the explicit Category One list “to be perplexing,” stating that “high-bandwidth video services are the primary reason for building high-capacity broadband networks” and further that video conferencing services “were not an afterthought, but (bluntly put) the entire POINT of the [E-Rate] refocusing effort.”<sup>4</sup>

This bewilderment regarding the absence of video conferencing services on the ESL is understandable considering that nothing in this proceeding to date has suggested that the Commission meant to remove distance learning/video conferencing services from the ESL. Indeed, the Commission’s original NPRM in 2013 highlighted the importance of such distance learning/video conferencing services, noting that “[h]igh-capacity broadband is also expanding the boundaries of our schools by allowing for interactive and collaborative distance learning applications, providing all students – from rural communities to inner cities – access to high-quality courses and expert instruction, no matter how small a school they attend or how far they

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<sup>2</sup> Comments of the State E-Rate Coordinators Alliance, CC Docket No. 02-6, GN Docket No. 09-51, WC Docket No. 13-184, at 2 (Sept. 3, 2014).

<sup>3</sup> Comments of the State of North Carolina Comments, CC Docket No. 02-6, GN Docket No. 09-51, WC Docket No. 13-184, at 2 (Sept. 3, 2014).

<sup>4</sup> Comments of E-Rate Service Providers, LLC., CC Docket No. 02-6, GN Docket No. 09-51, WC Docket No. 13-184, at 2 (Sept. 3, 2014).

live from experts in their field of study.”<sup>5</sup> In response to the Wireline Competition Bureau’s request for focused comment on E-Rate modernization in April of this year,<sup>6</sup> GCI noted that it was “pleased that video conferencing services [were] not included in the category of voice services that may receive reduced support under the Commission’s proposal.”<sup>7</sup> We stated further in those comments that “[v]ideo conferencing is a cornerstone for distance learning” and that “GCI has seen video conferencing allow an Alaskan school district covering many far-flung villages to provide classes with highly qualified instructors simultaneously across the whole district, rather than being forced to find instructors for each small, remote school.”<sup>8</sup>

Rural Alaska schools do not have teaching capacity to provide highly qualified teaching staff and diverse courses. Video conferencing is essential to providing courses not available at the individual school level. Commissioner O’Rielly noted as much during his recent visit to Alaska. In his subsequent blog post, Commissioner O’Rielly stated that through E-Rate-supported “video conferencing” and “video mentoring programs,” among other technologies, “teachers in one classroom are teaching students in multiple schools dotted throughout an entire region” and “students are being taught subjects by teachers they may never meet in person.”<sup>9</sup>

Providing that level of teaching and learning in rural Alaska requires network-optimized conferencing services for dozens of sites using a multi-point conferencing (bridging) service to

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<sup>5</sup> *Modernizing the e-Rate Program for Schools and Libraries*, Notice of Proposed Rulemaking, FCC 13-100, ¶3, 28 FCC Rcd. 11,304 (2013) (“NPRM”).

<sup>6</sup> *Wireline Competition Bureau Seeks Focused Comment on E-rate Modernization*, Public Notice, DA 14-308, WC Docket No. 13-184 (2014).

<sup>7</sup> Comments of General Communication, Inc., WC Docket 13-184, at 13 (Apr. 7, 2014).

<sup>8</sup> *Id.*

<sup>9</sup> Michael O’Rielly, FCC Commissioner, *Alaska: Lessons Learned* (posted Sept. 5, 2014) (at <http://www.fcc.gov/blog/author/Michael%20O'Rielly>).

connect in-room systems, not individual desktop video services. This is the only cost-effective way to provide adequately diverse courses for students in rural Alaska. Video conferencing services like Skype or other cloud-based delivery options are not viable alternatives as they are generally oversubscribed, provide only a best-efforts quality, and are designed for an individual stream to a desktop, creating a need for more bandwidth capacity at each school. Bandwidth, as the Bureau is well aware, is not abundant in areas of rural Alaska that lack access to fiber-based connectivity.

For these reasons, and to avoid any potential confusion, the Bureau should clarify that distance learning and video conferencing services remain on the Category One ESL

Respectfully submitted,

/s/

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