April 6, 1996

Office of the Secretary
Federal Communications Commission
1919 M Street N.W.
Washington DC 20554

Re: CC Docket No. 96-45:

In the Matter of the Federal-State Joint Board on Universal Service

Dear Commissioners:

I am Robert Bocher, a Technology Consultant with the Wisconsin Department of Public Instruction. On behalf of the department, I have made several brief comments in relation to the Universal Service provisions for schools and libraries that are incorporated into the Telecommunications Act of 1996.

The Wisconsin Department of Public Instruction strongly supports the Universal Service provisions outlined in section 254 of the recently enacted Telecommunications Act of 1996. It is essential that our students and teachers have access to the learning resources available via telecommunication networks. From the library perspective, our public libraries serve all state residents and are thus the universal access point to information. Libraries use of the telecommunication networks can enhance all citizens access to information.

My comments below reference specific sections of the March 8, 1996 "NOTICE OF PROPOSED RULEMAKING AND ORDER ESTABLISHING JOINT BOARD".


Paragraphs 78, 80, what additional services shall be available: Currently there areas of Wisconsin where school and library staff cannot dial into the Internet at faster than 9600bps because the phone lines will not support faster transfer rates. From a more long-term perspective, dial Internet access via voice-grade lines must be viewed as just a short-term, interim option. Schools and libraries need direct, dedicated access. To have this type of access at affordable rates, the Commission should be looking at inclusion of high speed telecommunication services as part of any Universal Service provision. This can be from 56kbps or ISDN on the low-end, to DS-1 or DS-3 speeds. Higher bandwidth is essential for interactive distance education. Currently Wisconsin schools are often paying thousands of dollars a month for such connectivity.

Paragraph 82, discount for services. Currently schools in Wisconsin are charged business telecommunication rates. The Wisconsin Public Service Commission just recently drafted rules giving
schools and libraries partial telecommunication discounts. However, these are only for new services and will be phased out after three years. It is essential and wholly within the spirit of the Telecommunication Act that such rate support be available to schools and libraries for current services and that the support not be automatically phased out after a given time period. The Federal-State Joint Board should set some type of nation-wide base of both services and costs covered under the Universal Provisions. To let states be responsible for establishing discounts on intrastate universal service is to potentially perpetuate the inequities that currently exist both between states and in different geographic and population areas within states. A graphic example of in-state disparities can be seen by viewing the enclosed chart showing the low level of Internet access in schools serving smaller Wisconsin communities. The primary reason for this is the telecommunication costs.

**Paragraph 83.** From our experience in Wisconsin, ongoing telecommunication costs are a much more critical issue than initial capital costs. It is very important to emphasize that funding the initial building of the information infrastructure, for example bringing fiber the final mile into a school building or library, is but one cost. Schools and libraries that can fund this initial cost as part of a capital budget request often find it difficult or impossible to pay for the ongoing monthly charges associated with maintaining the high-speed telecommunication link. Several major telecommunication carriers in our state have made a commitment to bring fiber to the schools and libraries. While we applaud their efforts, what is the purpose of bringing fiber into every school if the school cannot pay the monthly line costs? Thus without a telecommunication support mechanism to insure that schools and libraries can afford the ongoing costs of advanced telecommunication services, the fiber coming into the schools and libraries will remain dark. In brief, special universal services for libraries and schools should be offered at the lower of the lowest rate currently offered by a carrier to any customer, or the Total Service Long Run Incremental Cost (TSLRIC).

A common rejoinder to a preferential school/library tariff has been that its costs will have to be borne by other customers, like businesses and residential users. In a February 4, 1994 release from Representative Ed Markey's (D-MA) office, Ameritech stated that only 0.007% of its access lines in its five state Midwest area went to K-12 schools. That is seven thousandths of one percent! While there are certainly many other factors to consider when setting any rate preference, the Department of Public Instruction believes that providing even substantial rate support for our schools and libraries would have very little overall impact on business or residential telecommunication costs.

In summary all our nation's schools and libraries need low cost access to both basic and advanced telecommunication services. The passage of the 1996 Telecommunications Act and the work of the Federal-State Joint Board can make this a reality.

Thank you for your time.

Sincerely,

Robert Bocher
Technology Consultant
Wisconsin Department of Public Instruction

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School District Internet Access

Percent By Size of Community

Legend

- 50,000 +
- 10,000 - 49,999
- under 10,000

Urban Communities 59.3%
Medium Size Communities 32.4%
Small/Rural Communities 8.3%