

December 19, 2001

Josephine Scarlett
Office of the Chief Counsel
National Telecommunications and Information Administration
Room 4713 HCHB
1401 Constitution Avenue, NW
Washington, DC 20230

Re: [Docket No. 011109273-1273-01]

RIN 0660-XX13

Notice, Request for Comments on Deployment of Broadband Networks and Advanced Telecommunications

EDUCAUSE is an international nonprofit association dedicated to transforming higher education through information technologies. With over 1800 higher education and corporate members, EDUCAUSE has a vested interest in the development and deployment of advanced telecommunication networks.

EDUCAUSE appreciates the opportunity to provide comments on this issue. We recognize the Herculean challenge faced by the NTIA in developing a national telecommunications policy and hope we can assist in this endeavor.

Application Development and Promotion Are Essential

Broadband networks and advanced telecommunications have the potential to enhance distributed learning within our nation's colleges and universities and in the community they serve beyond the campus. The basic communications requirements for distributed learning overlap those for collaborative research, electronic commerce, access to government, personal and business communications, and even entertainment. Taken together, there is an economic incentive to provide a high-quality, low-cost "anytime, anywhere" availability to these networks as the demand for high-bandwidth applications grows. ^[1]

A primary policy consideration in formulating a national broadband policy should be to consider what applications and services Americans will deem essential to their daily lives. Broadband cannot be defined simply in terms of speed, but should be looked at in terms of its ability to encourage the development of new applications. The recent pullout of the broadband marketplace by some major carriers and the amount of "dark" or unused fiber has showcased that the demand for broadband services is still not meeting the available supply in certain parts of the country. Many Americans currently use the Internet to check e-mail and are unwilling to pay substantial extra costs for greater speeds. Without an economic incentive, it is understandable why some telecommunication providers are leery of deploying high-speed networks in parts of the country where demand is low.

Some have proposed the federal government subsidize "universal access" to broadband networks. EDUCAUSE believes that this issue is complex. The broadband application marketplace still needs time to develop and a single regulatory or legislative fix focused strictly on providing the means to access such services is likely to be premature. It is important that we not confuse "access for all" with affordable availability to the services consumers demand and society needs. In the interim, local educational institutions, public libraries, and community centers can serve as conduits for showcasing high-speed applications and help increase demand for such services. With increased demand, telecommunication providers will be more willing to take the financial risks in building their own networks and extending them to the home.

Addressing Pricing Discrepancies & Aggregating Demand for High-Speed Applications

EDUCAUSE believes that maintaining a regulatory environment that promotes facilities-based competition is the right approach. However, while market-based solutions seem to be evolving nicely in larger cities, this is not the case in smaller towns and rural America. Even when broadband is available in a region, the price of “last-mile” connectivity is enormously variable. Higher education continues to explore and deploy both new technologies and regional collaborations to aggregate demand for advanced services, but many of our institutions find themselves unable to obtain affordable broadband connectivity.^[2] Since 1998, EDUCAUSE members representing the top research universities through the EDUCAUSE Net@EDU program (<http://www.educause.edu/netatedu/>) have maintained an ongoing dialogue with telecommunication providers in addressing these pricing discrepancies and facilitating the deployment of affordable advanced networks for higher education. Many telecommunication providers still rely on voice-based pricing models that are inappropriate for the data communications and growing Internet-telephony environment. While not able to directly influence pricing models, EDUCAUSE members believe that affordable access to advanced services is possible. Some alternative approaches and recommendations are available on the EDUCAUSE/Net@EDU website: <http://www.educause.edu/netatedu/groups/pricing/>.

Continue Federal Support of Telecommunications Research

The high-profile legislative battles currently being fought concentrate on the terrestrial fiber option. EDUCAUSE believes there is no uniform technical solution to providing broadband services to all parts of the country and that the federal government is taking constructive, “technology-neutral” steps to ensure all telecommunication technologies are being developed, which we hope will facilitate deployment of alternative technologies where needed. Wireless technologies, while not matching the speed of existing terrestrial options, still have the potential to serve many underserved communities. EDUCAUSE applauds the September decision by the FCC to maintain the Instructional Television Fixed Services Spectrum (ITFS) in its current state.^[3] This will allow educational institutions to continue to provide distance learning services, teacher training and video programming while developing two-way interactive and high-speed broadband services that enhance the capabilities of distributed learning in the future. In addition, the National Science Foundation has made a commitment to help minority-serving institutions develop the campus infrastructure – including wireless - and national networking connections necessary to be full participants in the emerging “Internet age” by awarding EDUCAUSE and its partners a four-year, six million dollar grant. (See <http://www.anmsi.org/> for more information.)

EDUCAUSE again would like to express its appreciation to the NTIA for inviting public comments on this matter.

Sincerely,

Mark Luker
Vice President
EDUCAUSE

[1] Luker, Mark, ed. 2000. EDUCAUSE Leadership Strategies Vol. 1: *Preparing Your Campus For A Networked Future*. San Francisco, Jossey-Bass.

[2] Hawkins, Brian. Testimony Submitted to the Congressional Commission on Web-Based Education, July 14, 2000. [

[3] See FCC Website for more information:

http://www.fcc.gov/Bureaus/Engineering_Technology/News_Releases/2001/nret0107.html