

Before the
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of)	
)	
Inquiry Concerning the Deployment of Advanced)	GN Docket No. 09-137
Telecommunications Capability to All Americans)	
In a Reasonable and Timely Fashion, and)	
Possible Steps to Accelerate Such Deployment)	
Pursuant to Section 706 of the Telecommunications)	
Act of 1996, as Amended by the Broadband Data)	
Improvement Act)	
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51

**COMMENTS OF THE
SCHOOLS, HEALTH AND LIBRARIES BROADBAND COALITION**

The Schools, Health and Libraries Broadband (SHLB) Coalition respectfully submits these comments in the above-captioned proceedings. The SHLB Coalition previously filed reply comments in the proceeding for A National Broadband Plan for Our Future. We file these comments to re-emphasize the critical importance of making sure that community anchor institutions such as schools, libraries and health care providers have access to high-capacity broadband capabilities that will allow them to provide essential services to underprivileged and vulnerable segments of the population.

The Internet has become a fundamental cornerstone of modern education, learning, health care delivery, economic growth, social interaction, job training, government services, and the dissemination of information and free speech. High-capacity broadband is the key infrastructure that K-12 schools, universities and colleges, libraries, hospitals, clinics and other health care providers need to provide 21st century education, information and health services. These

institutions serve the most vulnerable segments of our population – rural, low-income, disabled, the elderly, students, immigrants and many others.

The SHLB Coalition is dedicated to ensuring that each and every school (including K-12 schools, colleges and universities), library and health care provider has robust, affordable, high-capacity, broadband connections. These anchor institutions use broadband services to provide essential services to millions of people every day. Providing high-capacity broadband to these institutions is a way to bring the benefits of broadband to the general public. For example,

- Health care providers can use high-capacity broadband to exchange detailed medical records, provide out-patient medical monitoring (telemedicine), and many other health-related services. Broadband capabilities can enhance the doctor-patient relationship, provide immediate access to health information, reduce the costs of health care, and save lives.
- Libraries provide Internet access at no charge to millions of people every day, including those who cannot afford to purchase computers or broadband access at home and others who need assistance, training or education about on-line services. Library patrons use public access computers to do homework, apply for jobs and e-government benefits, conduct research, and engage in all that the Internet has to offer.
- Schools use broadband connections to provide distance learning and offer multimedia teaching programs that address many learning styles and capabilities. In the 21st century, educators and students require more access to information, people, tools and resources. Broadband connections are redefining the education model for administrators, teachers, students and parents alike. "Networked education" makes education personalized,

equitable, relevant and cost-efficient, enabling improved 21st century outcomes for students.

Furthermore, building broadband to these institutions promotes jobs and economic recovery. Whether it is laying fiber optic cable or constructing antennas to provide high-bandwidth wireless capabilities, these investments in our future will provide thousands of American workers with high-tech employment. Building broadband networks to these anchor institutions will have the additional benefit of promoting economic growth in the region.

Principles of the SHLB Coalition:

The members of the SHLB Coalition support the following key principles:

First, it is extremely important for policy-makers to adopt policies that encourage the deployment of very high capacity broadband capabilities for these institutions. Our policy should be focused on building “future-proof” high-capacity broadband to these institutions, meaning networks that can provide a minimum of 100 Mbps to small entities and 1 Gbps service or faster to larger entities. These needs are very different from the needs of residential consumers. The FCC should develop a broadband standard for anchor institutions that is separate and distinct from that for residential consumers.

Second, providing high-capacity broadband to these anchor institutions will also benefit residential consumers in the surrounding community if the broadband facilities are open to interconnection with other broadband networks. Building broadband connections to these anchor institutions and making them open to interconnection can be a “stepping stone” or a “jumping off point” that makes it easier to build broadband facilities to homes and small businesses in the nearby neighborhood.

Third, the SHLB Coalition recommends that ALL entities, whether non-profit, commercial, or government, including non-profit research and higher education networks, rural or urban should be encouraged to deploy high-capacity broadband facilities to meet this mission. We also suggest that it is vitally important to ensure that broadband service is not only available but affordable. Finally, government programs to support broadband should have enforcement and monitoring procedures in place that are both effective and flexible.

Policy Recommendations

While the SHLB Coalition is continuing to develop its specific policy positions on some issues, there are some steps that policy-makers can take now to improve the quality of broadband delivered to these anchor institutions.

First, the federal government can give top priority to providing funding for high-capacity broadband connections serving these anchor institutions as it awards the \$7.2 billion in funding made available through the American Recovery and Reinvestment Act or when it awards any other broadband funding. Anchor institutions have very different needs than residential households, and it is extremely important that the eligibility of these institutions to receive broadband funding not be dictated by the definitions and geographic boundaries that might apply to households. Libraries, health care providers and schools in urban, suburban or rural areas that can demonstrate a lack of broadband capabilities and a need for greater broadband to serve their mission should be eligible for funding.

Second, in developing a national broadband policy, the Federal Communications Commission should ensure that the needs of schools, health-care providers and libraries for very high-capacity broadband are measured and satisfied. Third, state and local officials can address the needs of these institutions in their state and local broadband programs.

Sincerely,

A handwritten signature in black ink that reads "John Windhausen, Jr." with a stylized flourish at the end.

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September 4, 2009