Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	**)**	
	)	
Connect America Fund	**)**	WC Docket No. 10-90
	)	
Universal Service Reform – Mobility Fund	**)**	WT Docket No. 10-208
	)	
ETC Annual Reports and Certifications	**)**	WC Docket No. 14-58
	)	
Establishing Just and Reasonable Rates for Local	**)**	WC Docket No. 07-135
Exchange Carriers	**)**	
	)	
Developing an Unified Intercarrier Compensation	**)**	CC Docket No. 01-92
Regime	**)**	

JOINT COMMENTS ON BEHALF OF THE

SCHOOLS, HEALTH & LIBRARIES BROADBAND (SHLB) COALITION

AND THE

STATE E-RATE COORDINATORS' ALLIANCE (SECA)

In the Further Notice of Proposed Rulemaking in this proceeding, the Federal Communications Commission (FCC) requested comments, *inter alia,* on the need to establish appropriate broadband speeds to meet the evolving needs of community anchor institutions.[1] The Schools, Health & Libraries Broadband Coalition ("SHLB Coalition")[2] and State E-rate Coordinators' Alliance (SECA) submit these Joint Comments in order to offer our initial thoughts on this important issue.

The SHLB Coalition is a broad-based coalition consisting of representatives of schools, health care providers, libraries, private sector companies, for-profit and not-for-profit broadband providers, state and national research and education (R&E) networks, state mapping agencies, municipalities, philanthropic foundations, consumer organizations and others.[3] All members of the SHLB Coalition

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[1] Connect America Fund, et al, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 14-54, Order released June 10, 2014 at ¶ 159. This Order is hereinafter referred to as "FNPRM."

[2] "SHLB Coalition" is pronounced "SHELL-Bee Coalition."

[3] See www.shlb.org for a current list of the members of the SHLB Coalition.

share the common goal of bringing open, affordable, high-capacity broadband to anchor institutions and their communities across the United States.

SECA members provide statewide E-rate coordination activities in 46 states and 2 U.S. territories.[4] Representatives of SECA typically have daily interactions with E-rate applicants to provide assistance concerning all aspects of the program. SECA provides face-to face E-Rate training for applicants and service providers. SECA members serve as intermediaries between the applicant and service provider communities, the Administrator, and the FCC. Numerous members of SECA work for and apply for E-rate on behalf of large, statewide networks and consortia that further Congress' and the FCC's goals of providing universal access to modern telecommunications services to schools and libraries across the nation.

The FCC asked the right question when it sought comment on establishing the appropriate broadband performance targets for community anchor institutions.[5] These organizations are large consumers of broadband and need significantly greater capacity than residential or small business customers, but their resources are far less than the typical enterprise.

Indeed, the FCC's National Broadband Plan acknowledged and described in great detail the essential role of schools, libraries, health care providers and other community anchor institutions. Specifically, the National Broadband Plan recommended that the FCC set goals for minimum broadband connectivity and prioritize funds accordingly for all community anchor institutions.[6]

Community anchor institutions play a vitally important role in rural communities.[7] In many communities, libraries are the *only* provider of broadband access to the general public. Schools are increasingly incorporating Internet applications and smartphones and tablets into their curriculum, all of which require greater bandwidth. Health clinics often provide rural residents with their only connections to medical specialists around the country. Rural colleges and community colleges may provide the essential post-secondary educational services that rural residents need to find jobs and

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[4] The five states who are not represented in SECA are Maryland, Minnesota, Montana and Nevada. The territories not included in SECA are Guam and Northern Marianna Islands. Invitations are routinely extended to these non-member entities to join SECA.

[5] See FNPRM, para. 159.

[6] National Broadband Plan, Recommendation 11.15.

[7] Several reports document the needs of community anchor institutions for greater bandwidth and the economic benefits of serving them. Two such reports are "The Broadband Imperative" published by SETDA (available at http://tinyurl.com/krta8fv); and "Anchor Institutions Help Secure Broadband's Promise" by Dr. William Lehr (available at http://tinyurl.com/osumlfw).

create economic opportunities in their regions.

But the broadband needs of community anchor institutions should not be taken for granted. Anchor institutions often have a great need for additional broadband capacity, and their needs continue to grow. Furthermore, anchor institutions are often an essential component of a "success-based build"[8] strategy; anchor institutions can serve as "anchor tenants" and can help the network as whole achieve long-term financial sustainability. In other words, building out to community anchor institutions can provide great "bang for the buck", as the capacity used to serve the anchor institutions can also be shared with the surrounding business and residential community. Perhaps most important, community anchor institutions serve the general public; the people who need health, information and educational services will benefit most from high-capacity, high-quality broadband to anchor institutions. Investing in broadband networks to serve community anchor institutions is an important social good and also has a multiplier effect on the economic activity in the community as a whole.

We have two recommendations at this time. First, the recipients of Connect America Fund (CAF) funding should be required to serve anchor institutions. The current language suggests CAF recipient companies should confer with community anchor institutions when engaging in network design of CAF-supported infrastructure, but this does not provide any enforceable obligation on behalf of these customers.   The Commission should go further and mandate that anchor institutions are included in the service obligation of CAF recipients.

Second, the minimum broadband speed for anchor institutions should be increased. The present 4 Mbps/1 Mbps requirement for CAF recipients to provide residential and small business customers is simply insufficient for anchor institutions. The proposed increase to 10 Mbps downstream also will not meet these large customers' needs. There should be higher-speed targets for CAF recipients to implement for community anchor institutions in rural areas that takes into account these customers' current and future needs, and CAF recipients should be required to meet these targets within a specific period of time.

Several FCC documents reflect the importance of high-capacity broadband for anchor institutions. The National Broadband Goal #4 specifically calls for 1 Gigabit capacity to anchor

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[8] A "success-based build" strategy can perhaps be understood as the opposite of a "build it and they will come" strategy.
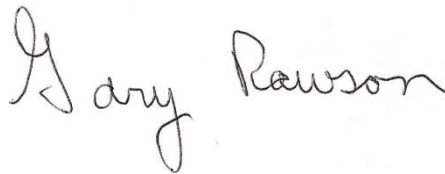
institutions.[9] The recent landmark E-rate reform Order[10] endorsed the SETDA standard that internal WAN connections from the district to the school and among schools should provide a dedicated data service scalable to 10 Gbps per 1,000 students.[11] The FCC noted that in most instances a network with 1 Gbps capacity can be upgraded to 10 Gbps without any additional installation of fiber. Network electronics may be changed out to readily increase the connection speed. For libraries, the FCC adopted goals of 100 Mbps (download) for libraries serving communities of less than 50,000 people, and 1 Gbps for libraries serving communities of 50,000 people or more.[12] All of these goals are far greater than the current residential (4/1) standard, reflecting the fact that anchor institutions have much greater broadband needs than the typical residential consumer.[13]

The availability of sufficient and affordable broadband services for all community anchor institutions, especially those in rural areas, is vital to ensuring that rural communities have comparable services to urban areas. Broadband services are keenly important to enable these communities to flourish and for rural citizens to be able to meaningfully participate in the digital age.

Respectfully submitted,

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[9] Several specific recommendations encouraged the FCC to set specific performance goals and to marshal USF resources to help achieve those goals.

[10] Modernizing the E-rate Program for Schools and Libraries, FCC 14-99, WC Docket No. 13-184, Report and Order and Further Notice of Proposed Rulemaking, Order Released July 23, 2014 at ¶¶ 32-44. This Order is hereinafter referred to as "E-rate 2.0 Order."

[11] See, "The Broadband Imperative," at http://tinyurl.com/krta8fv.

[12] See E-rate 2.0 Order, para. 11.

[13] The SHLB Coalition and SECA are continuing to review proposed bandwidth targets and plan to provide more specific recommendations in reply comments in this proceeding.