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

In the Matters of	)	
	)	
International Comparison and Survey	)	GN Docket No. 09-47
Requirements in the Broadband Data	)	
Improvement Act	)	
	)	
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
	)	
Inquiry Concerning the Deployment of	)	GN Docket No. 09-137
Advanced 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	)	

Reply Comments of Commenters Supporting Anchor Institution Networks
NBP Public Notice # 30

The undersigned organizations submit the following analysis and recommendations to the Federal Government to promote high-capacity bandwidth to community anchor institutions:

- Community anchor institutions play a critical role in economic development, job training, education, health care, public safety, and access to local, state and federal government services. High-capacity broadband is the key infrastructure that community colleges, K-12 schools, colleges and universities, libraries, health clinics and hospitals, public safety, local governments and public media and public access organizations need to provide 21st century services to their communities.

- The Federal Government recognized the need for high-capacity broadband to community anchor institutions in the broadband funding programs created by the American Recovery and Reinvestment Act (ARRA) and administered by the Departments

of Commerce and Agriculture. Furthermore, community anchor institutions fulfill many of the National Purposes spelled out in the ARRA for the National Broadband Plan.

- Community anchor institutions have a huge demand for high-bandwidth connections. **In the first round of funding made available by the ARRA, applicants for these programs requested seven times more funding than was available, and round two is expected to exceed that.** The ARRA programs are scheduled to complete their awards by September 30, 2010, and there is currently no plan to continue them.

- Community anchor institutions will require even more broadband capacity in the near future. High definition and streaming video already overwhelm the broadband capacity at many institutions. Applications such as teleconferencing, distance learning and digital media that allow for collaborations from multiple sites and use simulations, large data sets, and/or 3D require extremely high bandwidth yet are critical for education, healthcare, governmental functions, and research.

- Most traditional private sector companies have not addressed the unique needs of community anchor institutions for a variety of reasons. These include:
    - the economics of building high-capacity broadband networks to anchor institutions are often not attractive,
    - the high demands that anchor institutions place on network infrastructure, which are different than the demands created by residential and most business customers,
    - the expertise needed to manage these networks,
    - the expertise needed to provide the necessary services in connection with this unique group of users,
    - the shrinking state and local government funding which has reduced the budgets of community anchor institutions, and
    - the primary focus of traditional private sector companies on residential and business users.

- To address these needs, various governmental and non-profit organizations have built or operate and manage broadband networks focused on the needs of community anchor institutions. While many different models exist, many of these non-profit or university-based, education, research and governmental networks aggregate demand from several institutions and are thus able to offer higher bandwidth, lower prices, and efficiencies and expertise that are not available from the traditional commercial sector. Often these networks began as single purpose education, research and/or library

networks and make both middle mile and last mile services available, often through cooperation with the private sector.

- While these governmental, non-profit and entrepreneurial broadband networks have achieved many successes, their reach is far from complete. Most community anchor institutions cannot connect yet to these providers.

- As recognized by the Department of Commerce in its "comprehensive community" approach, building high-capacity broadband connections to community anchor institutions can benefit the entire community. Broadband networks deployed to serve community anchor institutions can be open to interconnection by other broadband network providers as a way to spur additional broadband investment into surrounding neighborhoods, including residences and businesses.

- We urge the Federal Communications Commission to address the critical needs of community anchor institutions for high-capacity broadband connectivity in the National Broadband Plan. Some of the actions that the government should consider include the following:
    - Support the development of a "Unified Community Anchor Network" ("UCAN"), a "network of networks" from which all anchor institutions who wish can receive high capacity broadband service. UCAN would capture efficiencies by aggregating demand, by being open to interconnection by other broadband networks, by utilizing existing infrastructure where practicable, and by creating additional infrastructure where necessary. It would work closely with commercial providers willing to support the unique needs of community anchor institutions. In addition, UCAN would be capable of generating and receiving funding, coordinate among existing providers of service to anchor institutions, aid in the expansion of these networks, launch new networks where needed, and advocate for the interests of anchor-institution-focused broadband networks and demonstrate their value to policy-makers.
    - Provide for additional funding for the ARRA broadband programs through Congressional appropriations;
    - Establish ongoing funding support from the Universal Service Fund administered by the Federal Communications Commission and maintain support for the anchor institutions currently benefiting from USF; and
    - Permit anchor institutions to collaborate freely to meet their needs without interference from restrictive legislation, rules and ordinances.

The following organizations call upon the Administration, Congress, federal government agencies, and state and local government to work together to adopt policies and programs which address the needs of community anchor institutions for affordable, open, high-capacity bandwidth as set forth above.

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