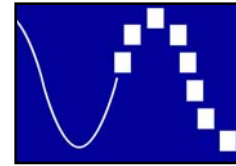


June 23, 2009



The VON Coalition

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20002

**Re: CC Docket No. 02-6 - Draft Eligible Services List, Schools and Libraries
Universal Service Support Mechanism, Funding Year 2010**

Dear Ms. Dortch:

As leaders in the field of internet communication technology development, VON Coalition members support the Universal Service Administrative Company's (USAC's) draft Eligible Services List (ESL) that proposes to increase the availability of Voice over Internet Protocol (VoIP) services for schools and libraries participating in the federal E-rate program for funding year 2010.¹ In particular, expanding VoIP services into both the telecommunications and Internet access categories, as well as permitting reimbursement for VoIP user licenses as internal connections, will encourage the continued growth of VoIP services and the VoIP industry. The use of VoIP services will also provide both much-needed financial savings and increased productivity to E-rate program participants.

The expanded availability of VoIP services will provide substantial savings for schools and libraries. VoIP is saving consumers billions of dollars. In particular, schools and libraries whose VoIP services are provided over wide area networks or similar access configurations will see dramatic reductions in the cost of calls between callers on the network.

In addition, VoIP services can boost worker productivity by as much as 15 percent² by providing users the ability to seamlessly work from home by simply plugging their VoIP phones into a broadband connection. VoIP features, such as converting voice mails to email or email to voice mail, will provide schools and library staff with instant access to communications. Finally, advanced conference calling and web collaboration tools will save users time and money by reducing the need for travel and in-person meetings while still giving users the opportunity to participate in programs at other schools and libraries.

¹ See Public Notice, Comment Sought on Draft Eligible Services List for Schools and Libraries Universal Support Mechanism, CC Docket 02-6, DA 09-1233 (released June 2, 2009).

² JOINT ADVISORY COMMITTEE ON COMMUNICATIONS CAPABILITIES OF EMERGENCY MEDICAL AND PUBLIC HEALTH CARE FACILITIES, REPORT TO CONGRESS (Feb. 4, 2008), (citing Avaya estimate), *available at* energycommerce.house.gov/ (search "Site Search" for "report to congress February 4, 2008" then follow "View Complete Report to Congress" hyperlink); *See also* Avaya.com, Avaya Unified Communications Solutions: Communicating at the Speed of Business... Without Breaking Stride! 1 (2008), www.avaya.com/master-usa/en-us/resource/assets/brochures/uc%20family%20brochure%20uc3377.pdf (last visited June 11, 2009).

In these difficult economic times, savings on communications services and increases in productivity will make more funds available for other schools and library needs. Moreover, giving employees the opportunity to work from home will contribute to a better work-life balance, reduce turnover, save energy, relieve congestion on our roadways and increase demand for broadband as consumers rely on applications that require high speed connections to the Internet. Finally, students and library patrons will have access to this important technology, making them more likely to subscribe to VoIP services at home or at work.

Finally, the VON Coalition supports USAC's inclusion of interconnected VoIP as an eligible service, irrespective of whether VoIP is classified as a telecommunications or an information service.³ The Commission has not yet resolved the classification of VoIP, but frankly this should, as USAC recognizes, have no bearing on the use or utility of the service by schools and libraries. Schools and libraries benefit from this provision in USAC's plan because they can safely move forward with subscribing to and purchasing VoIP services without any concern that one classification or another may adversely impact the availability of federal funding for these services in the future.

Sincerely,

/s/

The VON Coalition

³ See, e.g., Schools and Libraries' Eligible Services List for Funding Year 2010 at Page 3, n.1.