

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of	)	
	)	
A National Broadband Plan for Our Future	)	GN Docket Nos. 09-47, 09-51, and 09-137
	)	

**REPLY COMMENTS RE: NBP PUBLIC NOTICE #1**

**Submitted by:**  
**The Software & Information Industry Association (SIIA)**  
**The Consortium of School Networking (CoSN)**  
**The International Society of Technology in Education (ISTE)**

September 4, 2009

On behalf of the Software & Information Industry Association (SIIA), the Consortium for School Networking (CoSN) and the International Society for Technology in Education (ISTE), we write in response to the Federal Communications Commission's NBP Public Notice #1 seeking reply comments on defining "broadband" (GN Docket Nos. 09-47, 09-51, 09-137) for the purposes of the Commission's development of a National Broadband Plan. We appreciate this opportunity to comment on this important issue. Our comments today will focus particularly on broadband needs in our educational institutions, and especially in K-12 education, where hundreds or even thousands of individuals (students, teachers and others) in a given building (or within an area network) may need access to robust, interactive and multimedia resources at a given time.

Collectively, SIIA, CoSN and ISTE represent more than 500 high-tech companies and over 100,000 education leaders, teachers and other education professionals. Our organizations and our members work to improve education through the effective use of technology.

We view high-speed broadband access and connectivity as critical to a 21<sup>st</sup> century education system, and to providing our administrators, teachers and students with access to the technology-based tools and resources so critical to delivering teaching and learning in today's digital age. These online tools and resources include assessment, data systems, distance learning, digital content, instructional software, communication and collaboration tools, professional development communities, and other software applications hosted and delivered online. Our K-12 education system has made important strides toward a technology-rich teaching and learning environment, including through the help of the federal e-Rate, but much progress remains to be made in our practices and technology infrastructure and access.

While nearly all of the nation's educational institutions now have Internet access, we know the job is far from done. Most often, Internet access is measured to the building, and, even if characterized as "broadband" access, is seldom sufficient to meet the demands when many students are online at a given time. The current FCC definition defines broadband as speeds in any one direction to a range of 768 Kbps 1.5 Mbps, but that is woefully inadequate for schools and libraries that are transforming to a web-based model for instruction and curriculum. As a result of this transition, schools and libraries can have hundreds or thousands of simultaneous users online conducting research, accessing remotely hosted applications, interacting with adaptive and multimedia software, taking online courses, etc.

RECOMMENDATION: SIIA, CoSN, and ISTE therefore recommend that the FCC define broadband, at least with regard to K-12 educational institutions, as an external Internet connection of at least 10 Mbps per 1,000 students/staff and an internal WAN connection of 100 Mbps per 1,000 students/staff, growing in the next 5 years to at least 100 Mbps for external connection and a minimum of 1 Gbps per 1,000 students/staff for internal WAN connections.

These recommendations are consistent with recommendations from the State Educational Technology Directors Association (SETDA), as formed with the counsel of an expert advisory panel composed of education and industry stakeholders (see <http://www.setda.org/web/guest/2020/broadband>).

The Software & Information Industry Association (SIIA) is the principal trade group of the software and digital content industry, representing more than 500 high-tech companies. Many SIIA members develop and deliver digital content, software applications and related services over the Internet, and therefore rely on robust and reliable user Internet connectivity necessary to access those products and services. This includes the many SIIA members partnering with K-12 schools, colleges and universities, and other educational institutions to provide educational software, digital curriculum, online services and related technologies. For further information about SIIA, visit [www.sii.net](http://www.sii.net).

The Consortium for School Networking (CoSN) is a nonprofit organization that serves as the country's premier voice in education technology leadership. It services K-12 technology leaders who, through their strategic use of technology, improve teaching and learning. Its members include school districts, state and local education agencies, nonprofits, companies and individuals. Through the years, the organization and has worked to advance the K-12 education community's capacity to effectively use technology to improve learning through advocacy, policy and leadership development. For further information about CoSN, visit [www.cosn.org](http://www.cosn.org).

The International Society for Technology in Education (ISTE) is a trusted source for professional development, knowledge generation, advocacy, and leadership for innovation. A nonprofit membership organization, it is the premier membership association for educators and education leaders engaged in improving teaching and learning by advancing the effective use of technology in PK-12 and teacher education. Home of NETS and NECC, ISTE represents more than 85,000 education professionals across the globe. To learn more about ISTE, visit [www.iste.org](http://www.iste.org).

We appreciate the opportunity to comment on this important request to define broadband. Please do not hesitate to contact the parties below with any questions.

Respectfully Submitted,

Mark Schneiderman  
Sr. Dir. Education Policy  
Software & Information  
Industry Association  
1090 Vermont Ave, NW  
6<sup>th</sup> Floor  
Washington, DC 20005  
202-289-7422, ext. 1329  
[marks@sii.net](mailto:marks@sii.net)

Keith R. Krueger  
CEO  
Consortium for  
School Networking  
1025 Vermont Ave, NW  
#1010  
Washington, DC 20005  
202-861-2676, ext. 118  
[keith@cosn.org](mailto:keith@cosn.org)

Hilary Goldmann  
Dir. Government Affairs  
International Society for  
Technology in Education  
1710 Rhode Island Ave., NW  
Suite 900  
Washington, DC 20036  
202-861-7777, ext. 119  
[hgoldmann@iste.org](mailto:hgoldmann@iste.org)