

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
2002 Biennial Review of FCC	)	CG Docket 02-311
Telecommunications Regulations	)	

**COMMENTS OF  
THE ALLIANCE FOR PUBLIC TECHNOLOGY**

**I. Introduction**

The Alliance for Public Technology (APT) welcomes the opportunity to comment on the Commission’s broad review of regulatory requirements for telecommunications services and the need to maintain strong safeguards so all consumers have access to all services regardless of income level, location of residence, or physical limitations.

APT is a nonprofit organization, comprised of public interest groups and individuals, dedicated to ubiquitous deployment of advanced telecommunications services throughout our nation.

In order to fully recognize the potential of advanced telecommunications services, every sector of our nation must have affordable and useable access to them. To that end, APT developed the concept of “connecting each to all”<sup>1</sup> (i.e. networks gain their value by having everyone connected) and articulated the following goal of advanced universal service that is now embodied in Section 706 of the 1996 Act:

Make available as far as possible, to all people of the United States, regardless of race, color, national origin, income, residence in rural or urban area, or disability high capacity two-way communications networks capable of enabling users to originate and receive affordable and accessible high quality voice, data, graphics, video and other types of telecommunications

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<sup>1</sup> *Connecting Each to All*, Alliance for Public Technology, 1993

services.<sup>2</sup>

In this proceeding, the issue is not solely about broadband, but rather the entire realm of telecommunications services. Yet the concept of “connecting each to all” is equally relevant. Telecommunications regulations must ensure that all Americans have access to the whole range of services now available and the opportunity to utilize new services when they are introduced. The continuation of current protections is essential, particularly now as the telecommunications world moves into the broadband age. If the regulations are weakened or eliminated, then it is possible broadband will evolve with many barriers to consumer access and the steps taken to protect consumers in the Telecommunications Act will have to be repeated.

The Commission should retain all the current rules that ensure access to telecommunications services, including such provisions as common carriage/interconnection and accessibility regulations for people with disabilities. Preserving open networks and guaranteeing access for *all* Americans are fundamental tenets of “connecting each to all” and goals of the Telecommunications Act of 1996. Modifying or eliminating the rules now would be counterproductive and potentially harmful to millions of Americans. The market has not demonstrated that it can equally serve all people and when the market fails, it is these consumer protections that remedy the situation. The rules are vital for the pursuit of universal access to all telecommunications services and should be maintained.

Respectfully submitted,

Matthew D. Bennett

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<sup>2</sup> *Principles to Implement the Goal of Advanced Service*, Alliance For Public Technology, at 3 (1995).

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