

BY COURIER

Ms. Sayuri Rajapakse
Attorney-Advisor
Office of Policy and International Affairs
United States Copyright Office
Washington, DC 20024

Dear Ms. Rajapakse:

Bell Atlantic appreciates the opportunity to submit these brief comments on the issue of promoting distance education through digital technologies. We would like to be included on the Copyright Office's list of interested parties and look forward to working with your office as the project moves forward.

By way of background, Bell Atlantic is one of the largest telecommunications companies in the world and has a keen interest in ensuring the success of distance learning as global communications medium. Bell Atlantic supports many of the comments and concerns expressed by the library and educational associations to ensure that the success and growth of distance learning into the next millenium.

Our interest in this issue is twofold. First, Bell Atlantic has a business interest in ensuring the success of distance education. Bell Atlantic sells complete packages of distance learning solutions to our customers, including provisioning networking tools, hardware, monitors, wiring, cameras, mikes and of course the underlying telecommunications service that supports the network. Second, our nonprofit charitable foundation, known as the Bell Atlantic Foundation, has contributed millions of dollars toward funding distance learning projects in many states throughout the Bell Atlantic region. These efforts by Bell Atlantic and other telecommunications companies have resulted in the creation of extensive distance learning networks in every state in the United States.

Distance learning cannot grow, however, without easy and low or no cost access to content. The exemptions that libraries and educational institutions have come to rely upon in the physical world must be preserved and extended to promote distance education in the digital arena. An outright exemption for distance learning would be appropriate provided that such exemption be target to nonprofit accredited entities engaged in legitimate distance learning activities.

Bell Atlantic looks forward to working with the Copyright Office as it develops its specific recommendations to Congress on this very important issue.

Respectfully submitted,

Sarah B. Deutsch
Senior Intellectual Property Counsel