

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Communications Assistance for Law)	ET Docket No. 04-295
Enforcement Act and Broadband Access and)	
Services)	RM-10865

COMMENTS OF

**AMERICAN ASSOCIATION OF COLLEGIATE REGISTRARS AND
ADMISSIONS OFFICERS;
AMERICAN ASSOCIATION OF COMMUNITY COLLEGES;
AMERICAN ASSOCIATION OF STATE COLLEGES AND UNIVERSITIES;
AMERICAN COUNCIL ON EDUCATION;
ASSOCIATION OF AMERICAN UNIVERSITIES;
ASSOCIATION FOR COMMUNICATIONS TECHNOLOGY PROFESSIONALS IN
HIGHER EDUCATION;
ASSOCIATION OF COMMUNITY COLLEGE TRUSTEES;
ASSOCIATION OF JESUIT COLLEGES AND UNIVERSITIES;
EDUCAUSE;
HISPANIC ASSOCIATION OF COLLEGES AND UNIVERSITIES;
INTERNATIONAL SOCIETY FOR TECHNOLOGY IN EDUCATION;
INTERNET2;
NATIONAL ASSOCIATION OF COLLEGE AND UNIVERSITY
BUSINESS OFFICERS;
NATIONAL ASSOCIATION OF INDEPENDENT COLLEGES AND UNIVERSITIES;
NATIONAL ASSOCIATION OF STATE UNIVERSITIES AND LAND GRANT
COLLEGES;
UNIVERSITY OF CALIFORNIA**

(THE "HIGHER EDUCATION COALITION")

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TABLE OF CONTENTS

INTRODUCTION AND SUMMARY1

 A. Summary of Argument1

 B. Overview of the Higher Education Coalition and Its Interest in This Proceeding.....3

I. CONGRESS DID NOT INTEND FOR CALEA TO APPLY TO HIGHER EDUCATION NETWORKS.....4

II. THE PUBLIC INTEREST STRONGLY SUPPORTS AN EXEMPTION FOR HIGHER EDUCATION NETWORKS.....6

 A. There Is No Demonstrated Need To Subject Higher Education Networks to CALEA.7

 B. The Financial Burden of Extended CALEA Compliance Threatens To Deplete Scarce Resources and Derail Educational and Research Priorities.8

III. IF THE COMMISSION DOES NOT ADOPT A COMPLETE EXEMPTION, IT SHOULD IMPOSE MORE LIMITED AND NARROWLY TAILORED OBLIGATIONS ON HIGHER EDUCATION AND RESEARCH INSTITUTIONS.11

CONCLUSION.....14

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COMMENTS OF THE HIGHER EDUCATION COALITION

INTRODUCTION AND SUMMARY

The Higher Education Coalition (the “Coalition”)¹ respectfully submits these comments in response to the Further Notice of Proposed Rulemaking adopted in the above-captioned docket.²

A. Summary of Argument

The Commission should declare Coalition members to be exempt from the assistance capability requirements that will be imposed on providers of broadband Internet access services under the Communications Assistance for Law Enforcement Act (“CALEA”), 47 U.S.C. §§

¹ The Coalition includes the following members: American Association of Collegiate Registrars and Admissions Officers; American Association of Community Colleges; American Association of State Colleges and Universities; American Council on Education; Association of American Universities; Association for Communications Technology Professionals in Higher Education; Association of Community College Trustees; Association of Jesuit Colleges and Universities; EDUCAUSE; Hispanic Association of Colleges and Universities; International Society for Technology in Education; Internet2; National Association of College and University Business Officers; National Association of Independent Colleges and Universities; National Association of State Universities and Land Grant Colleges; University of California. Most of these organizations and institutions participated in the earlier phase of this rulemaking under the “EDUCAUSE Coalition” umbrella.

² *Communications Assistance for Law Enforcement Act and Broadband Access and Services*, First Report and Order and Further Notice of Proposed Rulemaking, ET Docket No. 04-295, FCC 05-153 (rel. Sept. 23, 2005) (“*Order*”).

1001-1010. Members of the Coalition operate private networks, which are specifically exempt from such requirements under CALEA. While the Commission recognized that operators of private networks are not subject to CALEA, it introduced ambiguity by extending CALEA to entities that “support the connection of the private network to a public network.” *Order* at ¶ 36, n.100. The Commission should clarify that this language was intended to impose obligations only on commercial Internet service providers that interconnect with private networks. In addition, to remove any doubt, the Commission should exercise its authority under CALEA § 102(8)(C)(ii) and exempt educational and research institutions as a class together with the Higher Education Networks they operate.³

While the Coalition strongly supports the law enforcement and national security goals underlying CALEA, Congress never intended to impose the burdens and cost of CALEA compliance on the information services provided on a non-common-carrier basis by Higher Education Networks. Moreover, extending CALEA to such institutions is neither necessary to national security nor otherwise in the public interest, in light of the infrequency of surveillance requests to Coalition members, their steadfast record of prompt compliance with such requests, and the detrimental impact that significant compliance costs would have on higher educational and research institutions.

At a minimum, if the Commission declines an exemption, it should confirm that CALEA can be applied only to Internet Connection Facilities,⁴ and not to the internal portions of these

³ We use the term “Higher Education Networks” to refer to the private networks owned and operated by universities and research libraries, as well as the private networks, gigapops, and other network services owned and operated by non-profit consortia of universities and related public institutions for the support of education and research. Examples include Internet2, National Lambda Rail, the Pacific Northwest Gigapop, CENIC, MOREnet, NYSERNET, and OSHEAN.

⁴ By Internet Connection Facilities we mean the border routers and/or switches that provide the interface between the Higher Education Network and the public Internet.

private networks. Moreover, absent an exemption the Commission should permit higher education and research institutions to phase in their installation of new, CALEA-compliant Internet Connection Facilities as existing facilities are replaced over the next five years. As the Coalition has discussed with the Department of Justice (“DOJ”), its members are also willing to undertake several commitments designed to ensure around-the-clock, rapid responses to any law enforcement requests.

B. Overview of the Higher Education Coalition and Its Interest in This Proceeding

The Higher Education Coalition is a consortium of higher education institutions, research entities, and nonprofit associations that promote the interests of higher education and academic research.⁵ As part of their educational and research-related missions, Coalition members own and operate private fiber-optic networks and related facilities that provide very high-speed data transmission capabilities. These Higher Education Networks also enable Coalition members to provide Internet access for their students, faculty, administrators, and other patrons on a non-profit, non-common-carrier basis. Coalition members all share the concern that compliance with the assistance capability requirements under CALEA could impose undue burdens on already-constrained budgets and undermine their ability to provide top-notch instruction to students and to cultivate breakthroughs in science.

The Coalition appreciates that Congress has given the Commission the important task of ensuring that telecommunications carriers facilitate law enforcement agencies’ efforts to protect national security and public safety, and its members will of course comply with any requirements that the Commission imposes. Without ever having been subject to CALEA, institutions of

⁵ The Appendix to these comments provides a brief description of each member organization or entity in the Coalition.

higher learning have an impeccable record of cooperating with surveillance requests whenever they have been asked to do so—though relatively few such requests have been issued. Those efforts will continue regardless of any CALEA exemption. The Coalition is eager to work cooperatively with the Commission and DOJ and to engage in a dialogue about the specific needs of law enforcement.

ARGUMENT

I. CONGRESS DID NOT INTEND FOR CALEA TO APPLY TO HIGHER EDUCATION NETWORKS.

Although the Coalition accepts for purposes of these Comments the Commission’s ruling that providers of broadband Internet access are subject to CALEA, we do not believe that Congress intended CALEA to apply to Higher Education Networks.⁶ The *Order* considered the application of CALEA to Higher Education Networks only in passing. After suggesting in the initial Notice of Proposed Rulemaking that educational networks likely would not fall under CALEA,⁷ the *Order* stated in a footnote that, “[t]o the extent . . . that [such] private networks are interconnected with a public network, either the PSTN or the Internet, providers of the facilities that support the connection of the private network to a public network are subject to CALEA”⁸

⁶ The Higher Education Coalition assumes the *Order*’s validity for purposes of this rulemaking, but continues to believe, as argued in the EDUCAUSE Coalition Comments, that CALEA cannot properly be extended to information services, *see* 47 U.S.C. §§ 1001(8)(C)(i), and, in any event, broadband Internet access is not a “replacement for a substantial portion of the local telephone exchange service.” *Id.* § 1001(8)(B)(ii).

⁷ *See Communications Assistance for Law Enforcement Act and Broadband Access and Services*, Notice of Proposed Rulemaking, ET Docket No. 04-295, 19 FCC Rcd. 15676, 15704, ¶ 48 & n.133 (2004).

⁸ *Order*, at ¶ 36, n.100.

This language does not clearly state which entity is considered to “support” the connection of a private network to a public network. In light of the statutory exemption of private networks, we believe the Commission may have intended only to establish that the point of demarcation between a private network and a public network is the point at which the private network operator hands off or picks up traffic from the commercial Internet access provider. That point is the POP operated by the commercial Internet access provider—the public network operator. Only that public network operator would be subject to CALEA under this approach.

If the Commission intended to include operators of Higher Education Networks as entities that “support” the connection to a public network, because they lease private lines or dark fiber to connect to a commercial ISP’s POP (as most enterprise networks do), it should exempt these entities under Section 102(8)(C)(ii) of CALEA, because Congress never intended the statute to apply to them.

Congress specifically exempted the “equipment, facilities, or services that support the transport or switching of communications for private networks.”⁹ Moreover, it limited the definition of “telecommunications carrier” to “a person engaged in the transmission or switching of wire or electronic communications as *a common carrier for hire*.”¹⁰ While that limitation did not feature prominently in the *Order* (as a result of the Commission’s reliance on the alternative Substantial Replacement Provision), it strongly suggests that Congress did not intend to include *non-profit, non-common-carrier* Higher Educational Networks within the statutory purview. Even if the Coalition members could be said to provide a “substantial replacement” for local telephone exchange service without ever having provided any kind of common carrier telephone

⁹ 47 U.S.C. § 1002(b)(2)(B). Notably, the Commission made no finding that the Substantial Replacement Provision somehow limits this exemption of private networks, in contrast to its conclusion that the SRP narrows the scope of CALEA’s exemption for information service providers.

¹⁰ 47 U.S.C. § 1001(8)(A) (emphasis added).

service in the first place, the fact that Higher Education Networks are private networks and fall far outside the core definition of “telecommunications carrier” supports an exemption from CALEA under Section 102(8)(C)(ii).

II. THE PUBLIC INTEREST STRONGLY SUPPORTS AN EXEMPTION FOR HIGHER EDUCATION NETWORKS.

In deciding whether to grant a particular class or category of “telecommunications carriers” an exemption under Section 102(8)(C)(ii), the Commission should evaluate whether such an exemption is in the public interest, balancing the burdens—financial and otherwise—that CALEA compliance is likely to impose on the particular class or category seeking an exemption against the need for enhanced surveillance capability in that particular setting. *See* 47 U.S.C. § 1001(8)(B)(ii) (requiring the Commission, in applying the “substantial replacement” provision, to find that “it is in the public interest to deem *such a person or entity* to be a telecommunications carrier for purposes of this title) (emphasis added). With respect to Higher Education Networks, the public interest weighs heavily in favor of an exemption.¹¹

¹¹ In the *Order*, the Commission identified three factors as relevant to the determination whether it was in the public interest to deem ISPs to be telecommunications carriers: the promotion of competition, the encouragement of new technological developments, and the protection of public safety and national security. *See Order*, ¶ 14. Although the Coalition believes the public interest analysis should not be limited to these three factors, they demonstrate that education and research institutions should be exempt from such requirements. The first factor, the promotion of competition, is not directly relevant in this context, because educational and research institutions do not compete in the commercial market for Internet access services. But this factor again demonstrates that they are not the kind of entities providing service *for hire* that Congress intended to reach. Second, educational and research institutions nurtured the development of the Internet in the first instance, and are continuing to develop new technologies, such as Internet2, the National Middleware Initiative, and the National Lambda Rail, Inc. The mandates of CALEA are likely to impede these research efforts by diverting resources from innovative research and development toward compliance with the assistance capability requirements — irrespective of whether such capabilities ever are invoked. Third, with respect to concerns of safety and security, as we discuss below, there is little need for enhanced surveillance capabilities on campuses and existing law suffices to protect these concerns.

A. There Is No Demonstrated Need To Subject Higher Education Networks to CALEA.

Regardless of whether CALEA applies, Higher Education Networks must—and do—comply promptly with lawful surveillance requests.¹² Congress enacted CALEA to augment surveillance capabilities with respect to telecommunications services provided over the public switched telephone network. But the statute’s additional requirements would produce little added benefit in the context of Higher Education Networks, where surveillance requests are extremely uncommon. There is no reason to impose these substantial burdens and potentially crippling costs on our institutions of higher learning absent any indication that law enforcement agencies have found compliance with surveillance requests to be deficient.

While complete historical records are not available, surveys of higher education institutions confirm that they rarely, if ever, receive surveillance requests. For example, a November 2005 survey of approximately 850 institutions by ACUTA: the Association for Communications Technology Professionals in Higher Education showed that, since 2004, only one institution reported receiving a wiretap request seeking the content of communications from any local, state, or federal law enforcement agency. That institution successfully complied with the request within 24 hours. While this survey did not cover all types of surveillance requests, it indicates the relative infrequency of requests in comparison to those received by commercial entities.

Higher Education Networks have faithfully complied with any such surveillance requests, even though they have never before been subject to CALEA. The interests of educational institutions naturally are aligned with those of law enforcement agencies because colleges and universities strive to provide the safest possible environment for learning. Safety and security

¹² See 18 U.S.C. § 2518(4).

are often key factors that students consider in deciding which college they will attend; such concerns also can affect recruiting and retention of faculty and administrators. Accordingly, Coalition members have welcomed the opportunity to work collaboratively with law enforcement agencies. Moreover, as reflected in the compromise proposals set forth below, we are willing to undertake significant additional measures to ensure that the needs of law enforcement are met.

B. The Financial Burden of Extended CALEA Compliance Threatens To Deplete Scarce Resources and Derail Educational and Research Priorities.

As discussed below, the Coalition interprets the *Order* to apply at most to its members' Internet Connection Facilities. If the Commission or DOJ were to adopt a broader reading in imposing assistance capability requirements, however, the burdens imposed on higher education and research institutions would increase exponentially. Any requirement under CALEA that Higher Education Networks must be capable of intercepting broadband communications transmitted by specified individuals—potentially at any point within the Higher Education Networks—would require Coalition members substantially to replace existing network facilities well before their useful life has expired.

CALEA's requirements realistically would not be satisfied through software updates alone. For instance, Section 103(a)(1) mandates that a telecommunications carrier be able to isolate "all wire and electronic communications carried by the carrier" and to enable the government to intercept those communications "concurrently . . . or at such later time as may be acceptable to the government." Routers and switches currently do not perform the task of identifying a particular user on the network, so in order to isolate the communications of a particular person a college or university might have to modify its networks to incorporate equipment that supports the required CALEA functionality. Based on preliminary discussions

with vendors, it seems likely that, if the Commission or DOJ adopted an expansive reading of the *Order*, higher education and research institutions would have to replace much—if not all—of their network equipment. Even if some of the components could be upgraded through software to perform the assistance-capability functions that CALEA requires, that fix could still be costly and likely would apply only to the most sophisticated and up-to-date equipment; it is unlikely that older equipment would be able to run the required software. In addition, colleges and universities might be required to purchase additional equipment to support the campus-wide aggregation, analysis, and delivery of intercepted communications to law enforcement agencies.

Coverage under CALEA also would appear to require that Higher Education Networks: (1) integrate their methods of user authentication with CALEA-compliant methods of user identification; (2) secure network equipment to prevent tampering with equipment or intercepted data; and (3) provide these enhanced capability features in a way that does not affect the reliability, flexibility, and performance of the network infrastructure. These adaptations would be especially burdensome for Higher Education Networks because, unlike common carriers, most campuses do not have a strong central networking organization. Instead, most Higher Education Networks are made up of dozens or hundreds of local area networks, each having unique design and management features and each being independently operated by colleges, departments, residence halls, and research labs.

It is impossible at this stage to estimate exactly how much CALEA compliance would cost, because the Commission has not established specific assistance capability requirements. But if the Commission requires the immediate replacement of network equipment, the financial burden on the entire higher education community could total billions of dollars. That cost estimate is for equipment only—it does not include labor and installation or any increased cost in

operations, nor does it include the cost of establishing a transmission pathway between the institution and the law enforcement agency.

While some have suggested that CALEA's ultimate compliance burdens may be far less extensive and less costly, there is simply no way for Higher Education Networks to rely on such assurances. Although the Commission has not yet specified the assistance capability requirements it will impose on facilities-based broadband internet providers, it nonetheless established an 18-month deadline, and the clock is running. Far from providing any comfort, the uncertainty produced by the absence of concrete requirements will require Higher Education Networks to take actions that affect their budgetary priorities in the very near future.

Colleges, universities, and Higher Education Networks must set their budgets well in advance because many programs require long-term financial commitments. To ensure that they will be able to comply with the Commission's 18-month deadline, Coalition members will have to move quickly and reallocate funds toward the expected cost of replacing network components, and in that process they will confront difficult choices about which programs they must sacrifice in order to meet the full demands of CALEA. Thus, even if the costs of CALEA compliance turn out to be less onerous than some press accounts predict, the Commission's Order will already have had a detrimental impact on academic planning and administration.

As already mentioned, if CALEA requires the replacement of a substantial portion of network equipment, the cost to the entire higher education community could total billions of dollars. The most likely consequences of such a financial burden would be an increase in tuition (which may be as high as several hundred dollars per student), cancellation of some educational programs, and a delay in other network improvements necessary for educational and research objectives.

These consequences would have broad societal impacts that the Commission should consider as part of its public interest analysis. Institutions of higher learning prepare America's youth to enter the workforce and are thus essential to maintaining a vibrant economy and global competitiveness. Higher education and research institutions also create unmatched opportunities to cultivate important scientific, social, philosophical, and political ideas. Indeed, education is widely recognized as a key pillar in preserving the strength of our democracy. These and other critical missions will necessarily be diluted if Higher Education Networks are compelled to divert critical resources away from their primary functions and toward CALEA compliance.

III. IF THE COMMISSION DOES NOT ADOPT A COMPLETE EXEMPTION, IT SHOULD IMPOSE MORE LIMITED AND NARROWLY TAILORED OBLIGATIONS ON HIGHER EDUCATION AND RESEARCH INSTITUTIONS.

For the reasons set forth above, the Coalition believes that the public interest would be best served by a complete exemption from CALEA for Higher Education Networks under Section 102(8)(C)(ii). If the Commission declines to exempt operators of such networks from all CALEA obligations, it should nevertheless tailor compliance standards to suit the circumstances unique to higher education. The Commission has ample authority to impose a limited set of assistance capability requirements.¹³ The Commission's authority to exempt any class or category of service providers logically includes the lesser power to establish a partial exemption.¹⁴ Moreover, the Commission has authority under Sections 107(b) & (c) of CALEA, 47 U.S.C. § 1006(b) & (c), as well as under its ancillary authority, 47 U.S.C. § 154(i), to tailor

¹³ See *Further Notice*, ¶¶ 49-52.

¹⁴ See, e.g., *United States v. O'Neil*, 11 F.3d 292, 296 (1st Cir. 1993) ("The principle that the grant of a greater power includes the grant of a lesser power is a bit of common sense that has been recognized in virtually every legal code from time immemorial.")

particular requirements to the limited needs of law enforcement with respect to Higher Education Networks.

Most importantly, in the absence of a full exemption, the Commission should reaffirm and clarify the limited scope of CALEA's requirements in these circumstances. The *Order* stated that Higher Education Networks are subject to CALEA *only* "to the extent . . . that [they] support [a] connection of the private network to a public network."¹⁵ As noted above, this language should be clarified to impose CALEA obligations only on commercial Internet service providers. In all events, we interpret this language to mean that even if an institution's Internet Connection Facilities become subject to CALEA's assistance capability requirements, all other portions of its private network would remain exempt from such requirements. The Comments submitted by DOJ support this reading. DOJ argued that an "entity providing Internet connectivity to an intranet, even if that entity is an educational institution, must comply with CALEA in its provision of that Internet connectivity. . . . But the entity providing the intranet — even if it is the same entity — *need not comply with CALEA as to the facilities that support communications over the intranet.*"¹⁶ The Commission's confirmation that facilities other than Internet Connection Facilities are exempt from CALEA would assuage much of the Coalition's compliance concern.

Nevertheless, the prospect of immediately replacing all Internet Connection Facilities itself would impose undue burdens on higher education and research institutions, for the reasons set forth above. The Coalition therefore asks that, if the Commission determines that the *Order* extended CALEA obligations to operators of private networks, Higher Education Networks be permitted a phase-in period during which they would introduce CALEA-compliant Internet

¹⁵ *Order*, at ¶ 36 n.100 (emphasis added).

¹⁶ DOJ Reply Comments in ET Docket 04-295 (Dec. 21, 2004) (emphasis added).

Connection Facilities, to the extent such equipment is commercially available, as their existing facilities are replaced in the normal course—or no later than five years after the effective date of the Commission’s order adopting specific capability requirements. This commitment would not extend to experimental or research networks.

The Coalition also is prepared to undertake additional commitments, which we have presented to DOJ in ongoing discussions. We believe these specific measures strike the appropriate balance between the safety and security concerns underlying CALEA and the other public interest factors discussed above. In addition to phasing in CALEA-compliant Internet Connection Facilities, each higher education institution will:

- appoint a senior official to ensure compliance with lawful surveillance requests and establish a 24-hour/7-day “hotline” for the law enforcement officials to reach the institutions whenever necessary;
- define policies and procedures setting forth how it will accept and assist with lawful surveillance requests;
- establish a training program that covers the technical, procedural, and legal issues involved in electronic surveillance for employees responsible for assisting law enforcement personnel, and conduct background checks of such employees;
- establish procedures to ensure the maintenance of adequate documentation and records; and
- provide technical assistance upon request to help law enforcement personnel understand the details of the institutional network.

The Coalition is confident that these measures will be more than adequate to meet the needs of law enforcement without unnecessarily harming the critical missions of higher education and research institutions.

CONCLUSION

The Higher Education Coalition respectfully requests that the Commission establish an exemption from CALEA for Higher Education Networks. As set forth above, such an exemption would best effectuate congressional intent and promote the public interest. At a minimum, the Commission should limit the CALEA obligations imposed on higher education and research networks consistent with the compromise measures the Coalition has presented to DOJ and proposes in these comments.

Respectfully submitted,

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APPENDIX

DESCRIPTION OF THE HIGHER EDUCATION COALITION'S MEMBERS

American Association of Collegiate Registrars and Admissions Officers (AACRAO)

AACRAO is a nonprofit, voluntary, professional association of more than 9,500 higher education admissions and registration professionals who represent approximately 2,300 institutions in more than 35 countries. Its mission is to provide professional development, guidelines and voluntary standards to be used by higher education officials regarding the best practices in records management, admissions, enrollment management, administrative information technology and student services. It also provides a forum for discussion regarding policy initiation and development, interpretation and implementation at the institutional level and in the global educational community.

American Association of Community Colleges (AACC)

Founded in 1920, the AACC has, over four decades, become the leading proponent and the national “voice for community colleges.” The association was conceived when a group of presidents representing public and independent junior colleges met in St. Louis, Missouri, for a meeting called by the U.S. commissioner of education. Originally named the American Association of Junior Colleges (AAJC), the association was to function as a forum for the nation's two-year colleges. Today, the AACC's membership represents close to 95 percent of all accredited U.S. two-year community, junior and technical colleges and their 10.5 million students, as well as a growing number of international members in Puerto Rico, Japan, Great Britain, Korea, and the United Arab Emirates. The colleges are the largest and fastest-growing sector of U.S. higher education, enrolling close to half (45 percent) of all U.S. undergraduates.

American Association of State Colleges and Universities (AASCU)

The AASCU represents more than 430 public colleges, universities and systems of higher education throughout the United States and its territories. The AASCU schools enroll more than 3 million students or 56 percent of the enrollment at all public four-year institutions. The AASCU was established in 1961 in response to “the growing impact of the federal government on higher education, particularly as it related to research grants and other grants-in-aid, had made it absolutely necessary that a strong national association be formed to represent the interests of students in state colleges and universities.”

American Council on Education (ACE)

The ACE, the major coordinating body for all the nation's higher education institutions, seeks to provide leadership and a unifying voice on key higher education issues and to influence public policy through advocacy, research, and program initiatives. Its members include approximately 1,800 accredited, degree-granting colleges and universities and higher education-related associations, organizations, and corporations. Founded in 1918, the ACE fosters greater collaboration and new partnerships within and outside the higher education community to help colleges and universities anticipate and address the challenges of the 21st century and contribute to a stronger nation and a better world.

Association of American Universities (AAU)

The AAU was founded in 1900 by a group of fourteen universities offering the Ph.D. degree. The AAU currently consists of sixty American universities and two Canadian universities. The association serves its members in two major ways. It assists members in developing national policy positions on issues that relate to academic research and graduate and professional education. It also provides them with a forum for discussing a broad range of other institutional issues, such as undergraduate education.

Association of Community College Trustees (ACCT)

The ACCT is a non-profit educational organization of governing boards, representing more than 6,500 elected and appointed trustees who govern over 1,200 community, technical, and junior colleges in the United States, Canada, and England. These community professionals, business officials, public policy leaders, and leading citizens offer their time and talent to serve on the governing boards of this century's most innovative higher education institutions—community, junior, and technical colleges—and make decisions that affect more than 1,200 colleges and over 11 million students annually.

Association for Communications Technology Professionals in Higher Education (ACUTA)

The ACUTA is a non-profit association whose members include approximately 800 colleges and universities. Its mission is to support higher education institutions in achieving optimal use of communications technologies. Its members include large and small institutions of higher education, ranging from several hundred students to major research and teaching institutions with greater than 25,000 students. ACUTA member representatives are responsible for managing telecommunications services on college and university campuses.

Association of Jesuit Colleges and Universities (AJCU)

The AJCU is a national voluntary organization whose mission is to serve its member institutions, the 28 Jesuit colleges and universities, and its associate members, the two theological centers, in the United States. Though each institution is separately chartered and is legally autonomous under its own board of trustees, the institutions are bonded together by a common heritage, vision and purpose. They engage in a number of collaborative projects in the United States and around the world.

EDUCAUSE

EDUCAUSE is a nonprofit association whose mission is to advance higher education by promoting the intelligent use of information technology. Membership is open to institutions of higher education, corporations serving the higher education information technology market, and other related associations and organizations. EDUCAUSE programs include professional development activities, print and electronic publications, strategic policy initiatives, research, awards for leadership and exemplary practices, and a wealth of online information services. The current membership comprises nearly 1,900 colleges, universities, and education organizations, including more than 180 corporations, and more than 13,000 active member representatives. EDUCAUSE has offices in Boulder, Colorado, and Washington, D.C.

Hispanic Association of Colleges and Universities (HACU)

HACU represents more than 400 colleges and universities committed to Hispanic higher education success in the U.S., Puerto Rico, Latin America and Spain. Although its member institutions in the U. S. represent less than 10% of all higher education institutions nationwide, together they are home to more than three-fourths of all Hispanic college students. HACU is the only national educational association that represents Hispanic-Serving Institutions (HSIs).

International Society for Technology in Education (ISTE)

The ISTE is the largest teacher-based nonprofit organization in the field of educational technology, representing more than 75,000 computer-using educators. The ISTE is dedicated to providing leadership and service to improve teaching and learning by advancing the effective use of technology in K-12 education and teacher education. The ISTE provides its members with information, networking opportunities, and guidance as they face the challenge of incorporating computers, the Internet, and other new technologies into their schools.

INTERNET2

INTERNET2 is a consortium being led by 206 universities working in partnership with industry and government to develop and deploy advanced network applications and technologies, accelerating the creation of tomorrow's Internet. Internet2 is recreating the partnership among academia, industry and government that fostered today's Internet in its infancy.

National Association of College and University Business Officers (NACUBO)

Located in Washington, D.C., the NACUBO serves a membership of more than 2,500 colleges, universities, and higher education service providers across the country. The NACUBO represents chief administrative and financial officers through a collaboration of knowledge and professional development, advocacy and community. Its vision is to define excellence in higher education business and financial management.

National Association of Independent Colleges and Universities (NAICU)

The NAICU serves as the unified national voice of independent higher education. Since 1976, the association has represented private colleges and universities on policy issues with the federal government, such as those affecting student aid, taxation, and government regulation. With nearly 1,000 members nationwide, the NAICU reflects the diversity of private, nonprofit higher education in the United States. Members include traditional liberal arts colleges, major research universities, church- and faith-related institutions, historically black colleges and universities, women's colleges, performing and visual arts institutions, two-year colleges, and schools of law, medicine, engineering, business, and other professions.

National Association of State Universities and Land Grant Colleges (NASULGC)

Founded in 1887, the NASULGC is the nation's oldest higher education association. A voluntary association of public universities, land-grant institutions and many of the nation's public university systems, NASULGC campuses are located in all 50 states, the U.S. territories

and the District of Columbia. Dedicated to supporting excellence in teaching, research and public service, NASULGC has been in the forefront of educational leadership nationally for over a century. In 1963, the American Association of Land-Grant Colleges and State Universities merged with the National Association of State Universities to create the association in its present configuration as the NASULGC. As of February 2004, the association's membership stood at 212 institutions. This includes 76 land-grant universities (36% of NASULGC's membership), of which 17 are the historically black public institutions created by the Second Morrill Act of 1890, and 27 public higher education systems (12% of NASULGC's membership). In addition, tribal colleges became land-grant institutions in 1994 and 31 are represented in NASULGC through the membership of the American Indian Higher Education Consortium (AIHEC).

University of California (UC)

The UC, which is overseen by the University of California Office of the President (UCOP), comprises a system of 10 campuses with approximately 200,000 students that include five medical schools and three law schools.