October 2, 2019

Ms. Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

**Re: Ex Parte – In the Matters of Modernizing the E-Rate Program for Schools and Libraries, WC Docket No. 13-184 and Universal Service Contribution Methodology, WC Docket No. 06-122**

Dear Ms. Dortch:

On October 2, 2019, the following individuals held separate meetings with Commissioner Jessica Rosenworcel and Travis Litman of her staff and Nirali Patel of Chairman Pai’s office: Jon Bernstein and Sasha Pudelski, representing AASA, The School Superintendents Organization; and the following representatives of California County Offices of Education:

* Gayle Garbolino-Mojica , Placer COE
* Deneen Guss, Monterey COE
* Scott Nanik, Calaveras COE
* Ted Alejandre, San Bernardino COE
* Mary Sakuma, Butte COE
* Steve Herrington, Sonoma COE
* Lisette Estrella-Henderson, Solano COE
* Barbara Nemko, Napa COE
* Amanda Dickey

During our meetings, the group discussed issues related to the Commission’s universal service cap and Category Two Formula NPRMs. The group noted that the E-Rate had been immensely valuable to their districts, particularly in connecting their rural areas and, in at least one case, a Native American reservation. Members of the group indicated that they opposed the idea of caps that might lead to E-Rate competing with rural health clinics and hospitals. They were particularly concerned with this prospect as the Rural Health Care program was seeing significant growth in demand for its support. The group endorsed the Category 2 NPRM proposal to raise the current $9,200 floor for very small school and library applicants as that sum was simply inadequate for the needs of small rural schools. Several noted that the $150 per pupil formula also ought to be increased as it was insufficient for schools in rural areas where geography and distance create significant barriers and costs are often higher because of the lack of competition. The group also voiced support for adding Wi-Fi on buses and cybersecurity as new E-Rate eligible services.

Respectfully submitted,

/s/ Jon Bernstein