

COMMENT ON CATEGORY TWO BUDGETS

WC Docket No. 13-184

From Marvin Adams
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I am responding on behalf of the Columbia School District in Columbia Mississippi.

Question: Is C2 working for you?

Absolutely. Having C2 funding available has given our district a chance to have the infrastructure in place to begin a 1:1 program through the 5th grade this year and the rest of the district next. With state budget cuts, there would have been no way we could have done this.

Question: Do you need more C2 budget?

I DO NOT. I firmly believe districts in areas accessible to multiple vendors of products should have no problems getting all of they need with the funding available assuming the funding keeps up with inflation. We might not get the top of the line equipment but we can get equipment that more than accomplishes what we need.

Question: Do you need less C2 budget?

I think the budget is just right assuming it keeps up with inflation.

Question: What could be done to make it easier for you, particularly during the 471 application process?

You could eliminate the detailed line items that take so long to enter the way it is being entered in EPC. HOWEVER I DO NOT THINK THIS SHOULD BE CHANGED. I believe the information that is being gathered from the line items entries is sufficiently beneficial to the decision makers and to the public to make it more than worth the effort. It is not that difficult. The fact is that "Ease of Use" and "Transparency" are mutually exclusive.

Transparency is much more important. The public has a right to know what we are doing and the decision makers need accurate and detailed information.

Question: If the FCC were to decide that we don't need to enter each and every line item of our equipment, what is to prevent the crooks from including ineligible in their purchases?

See above. I am all for transparency in everything I do.

Additional Comments.

I am in contact with neighboring districts in our state and we discuss E-Rate frequently.

I believe we all think C2 is a very good thing. Some who had done projects just before C2 funds became available are waiting until the last year to use theirs. Some, because of the aforementioned state budget cuts, are scraping together the matching funds to do a project. I am not sure the rest of the country understands that in Mississippi, our choices are very limited due to lack of funding both locally and from the state.

I hear questions such as "Why would you spend district funds for an infrastructure that will not be used because we do not have the funds to purchase the computers to use it" The 1:1 computers we are getting are being paid for with some excess federal funds that came down to us this year. The state has cut us significantly each year since 2009 and technology suffers when this happens since we still have to have the basics before technology such as teachers, desks, chairs and all of the other things involved in education.

With so many completely valid reasons for a school district not to have used their C2 budget, it would be incomprehensibly wrong to cut the C2 program just because it is not being used. It will be and the reality is that the taxpayers pay nothing when it is not used so what is the problem?

As far as the complexity of the program, it is simply necessary to be complex in order to be transparent. I do all of our E-Rate myself without a consultant. Maybe you could consider somehow helping pay for E-Rate application consultant costs if possible. It is not that hard to do but when you listen to State E-Rate Coordinators like ours you would think it was rocket science and you will be in jail for years if you make a single mistake.

One comment that is not related to C2. I implore the FCC to do something about State Master Contracts as they are being implemented in Mississippi. They are costing the system hundreds of thousands of dollars in Mississippi. All that has to be done is require those using state master contract pricing to get bids from other service providers to be sure the SMC is the best price. The process of allowing a SMC to be used without any LOCAL competitive process when the competition is always local does not seem to be in sync with E-Rate reform. Competition is local in that the little guys do not have fiber everywhere but in selected locals. They typically will beat the Mississippi State Master Contract when given a chance in those areas. E-Rate districts in those areas will often choose to use the SMC simply to avoid the time consuming competitive process. This is completely against the expressed intent of the FCC in E-Rate Reform. This really needs to be corrected.