

Elmore County Board of Education

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October 17, 2017

Chairman Ajit Pai
Federal Communications Commission
445 12th Street SW,
Washington, DC 20554

Dear Chairman Pai,

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the E-Rate program. Before delving into my response to the proposed changes, I want to thank the FCC for your continued support for the E-Rate program and for the policy and programmatic changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools like the 14 Elmore County Public Schools (11,000 students) to obtain affordable telecommunications and internet access without these funds we would not be able to provide our students with broadband access.

It is not good enough to ensure that high-capacity broadband reaches schools and library doors; adequate bandwidth must reach every building and classroom and every student, educator, and library patron. Otherwise, the promise that broadband can provide our students and library patrons will be lost. Any restructuring of the current Category II distribution mechanism cannot abandon a cornerstone of the E-rate program: equity, using poverty as the metric. The E-Rate program's biggest success has been in raising up low-income schools and libraries, allowing their students, educators, and library patrons to receive Internet access equal to their wealthier peers. In our view, any formula based on per student, per classroom, per building or per district allocations, would hit hard the rural and geographically low population areas that E-Rate was designed to support. We need to increase rather decrease the support for Category II.

Elmore County Public Schools school system falls into the 52% free and reduced lunch category. We are also in a rural area where many of our families do not even have adequate options for broadband to be delivered to their homes. Creating a situation that schools must rely more on the category 2 with the Internet and telecommunication options to provide options to increase that digital equity that everyone is trying to achieve.

We will be losing the telecommunication discounts from Category 1 this upcoming year and this means we must evaluate our options when it comes to telephones in the classrooms. This has become both a safety and security necessity, because of our older cinder block schools and the rural locations making cell phones problematic for schools. Wireless assisted calling for communications and emergencies may become our only option in these schools and so high-speed broadband connectivity will give our students and staff comfort in knowing we can reach someone in a time of need if classroom phones are eliminated due to funding cutbacks with the elimination of the Category 1 funds for telecommunications.

The E-Rate program is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended.

E-Rate played a critical role in the rapid and significant expansion of connectivity in schools, and the 2014 modernization was a much-needed update to ensure more schools and libraries are connected to broadband. The E-Rate's investment in Category 2 Wi-Fi and internal connections funding is extremely valuable and could not be replaced by local, district, or state funds.

Our district has used most of our Category 2 funds and plans to use all its E-Rate Category 2 allotment by 2020 for the following items:

- Upgrade/increase our routers and switches so that we have an option to increase the number of wireless access points used in a school
- provide equipment to allow caching so that information is delivered at a quicker rate
- provide schools an uninterruptible power supply (UPS)/battery backup

We anticipate that the connectivity provided by these Category 2 items will improve our district's educational experience with faster upload/download speeds, more uniform content delivery, providing a power source that is a more reliable and easier on the equipment.

In closing, I want to assure you that my district's continued, strong support for and reliance upon the E-Rate program is a prerequisite to a student's successful college/career experience. Connectivity is just as important as electricity in our schools. We cannot do without digital equity, if we want our students to excel in today's global economy. We need them to have access to a high-speed broadband connection because it is central to our students' learning. Thank you for considering my comments.

Sincerely,


BARBARA BURCHARD

"Digital Equity Evangelist"

Chief Technology Officer

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Elmore County Public Schools