ON BEHALF OF JEFFERSON PARISH SCHOOL DISTRICT

EDUCATIONAL PROFESSIONAL SERVICES AND

EDUCATIONAL CONSULTING ASSOCIATES

The E-Rate Category 2 budget of $150 per student ($127.50 committed at 85% in 2015-2016) is greatly appreciated; however, the funding is *NOT* sufficient to accomplish the Category 2 goals as set forth in the Modernization Order. Additionally, the restriction of using the funding at "site specific locations" is creating hardships on the applicants and limiting the applicants' ability to maximize resources.

The FCC Modernization Order Page 34, Paragraph 89. lists its goals as "ensuring affordable access to high-speed broadband for schools and libraries by ensuring that (a) eligible schools and libraries have greater access to E-Rate funding for internal connections necessary to distribute high-speed broadband within their buildings and (b) *that category two budgets will be sufficient to ensure that eligible schools and libraries will be able to afford the deployment or upgrade of those internal connections*."

In funding year 2015-2016, many E-Rate applicants viewed Category 2 funding as a one-time opportunity to upgrade wireless in all of the schools. In 2013-2014 and 2014-2015, no E-Rate funding was approved for network equipment (Priority 2). The fear of sudden changes in the E-Rate program and the uncertainty of the continued Category 2 funding beyond 5-years, prompted many applicants to "take the money and run."

In anticipation of applying for Category 2 funding, E-Rate applicants began assessing each school's needs and designing WIFI networks that would provide campus-wide WIFI access with excellent strength. Schools planned for students to use wireless to take standardize test, streamed HD teaching videos and participate in online learning which require a stable wireless signal.

E-Rate applicants quickly scaled back their expectations and plans when bids were received. The funding was simply not enough to meet the needs. Some applicants reconsidered plans to distributed WIFI campus wide (e.g. gyms, cafeterias, auditoriums) and focused on classrooms. Others tried to blend very old equipment with the newer equipment. Some districts were fortunate enough to have local funds available to offset the cost.

E-Rate applicants are realizing another challenge is the $150 per student budget is site specific. Factors such as the construction and age of the buildings, the timing of recent upgrades in buildings, and the geographic location (rural or urban) of the buildings must be considered at each site. Regardless of the school's needs and the construction of the building, the number of enrolled students at each site determine the Category 2 budget.

Large districts find tracking site specific budgets are challenging. Applying for site specific funding forces applicants to create individual funding requests. Managing upwards of 100 Category 2 budgets is similar to balancing 100 checking accounts.

To return unused funding, applicants must identify the specific line item in each request where the under used funding was created. For example, to return $251 the applicant reviewed 15 lines items and

34 invoices to determine the why $251 was unused. The vendor had reduced the pricing of 1,906 connectors which caused the under charge.

Tracking the site-specific budgets year to year and allowing for enrollments shifts, additional funding for inflation and relaying on the EPC online tool which has not been updated, causes many applicants to give up on returning the funding.

A "District Category 2 budget" would allow a more efficient method of distributing the funding and accessing the needs at each location. Balancing one checking account is far easier and more efficient.

If the site-specific funding restrictions were lifted applicants could manage the funding based on the needs of the site. Why are students attending a school constructed with concrete more likely to have less reliable WIFI access than those students attending schools constructed of sheetrock?

The FCC is requesting comments to provide "specific, measurable data to assist the analysis of the Category 2 budgets." The data being presented is based on the Jefferson Parish School District's WIFI network and infrastructure upgrades which were initiated in the 2015-2016 E-Rate funding year.

Jefferson Parish School District is located near New Orleans and in 2015-2016 USAC committed $5,925,419.74 in Category 2 funding. The district reported an enrollment of 49,780 students of which 46,478 students were eligible for Category 2 funding. The District has an 85% Category discount.

Understanding the cost of the needed upgrades far exceeded Category 2 funding available, the school board voted in favor of allocating $27 million in local funding to offset the deficit. The total capital expenditure of $32,925,419.74 enabled 77 schools to upgrade their WIFI networks. The District's WIFI network capacity is designed to provide saturated wireless to all users anywhere on the school campus and to withstand the future bandwidth increases and wireless usage in a 1:1 environment.

Jefferson Parish School District's Metropolitan Area Network (MAN) was upgraded in 2014 to 10 GIG connections to all sites and the Internet Access was increased to 10 GIGS shared. Both Internet and connectivity to the schools are delivered by fiber. Upgrading bandwidth is a double edge sword for Districts because increasing bandwidth also results in the need to upgrade the network core equipment.

In Jefferson Parish School district all switches, access points, wiring and UPSs were replaced at every site and the data center's core appliances were replaced. The total cost per student for this project is $661.42 per student.

Below is an example of specific, measurable data to assist the FCC in the analysis of the Category 2 budgets.

TOTAL CAPITAL OUTLAY: $32,925,419.74

E-RATE COMMITTED FUNDS: $5,925,419.74

DISTRICT FUNDING: $27,000,000.00

 49,780 Enrolled Students

46,478 Enrolled and eligible for E-Rate Funding

77 School Sites

2,792 Classrooms *does not include learning spaces such as cafeteria, auditoriums, gymnasiums)

7,490 Access Points

15,212 Wiring Cables

1,952,923 feet of Cat. 6 Cable (370 miles)

2.7 Average APS per learning space

97.3 Average Aps deployed per site

22.5 Average Construction working days per site

62,140 pounds of equipment delivered and installed

1,877 Switches

21 10 Base Modules

195 Enclosures

In closing, we respectfully recommend the FCC consider increasing the $150 per student Category 2 budget cap and to consider lifting the site specific requirement for Category 2 E-Rate funding.

Jefferson Parish School District has set the bar extremely high with their construction of an unprecedented and efficient WIFI and Metropolitan Area Network infrastructure.