 **Educational Service Center**

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

October 23, 2017

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 critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

The Sioux City Community School District is an urban district in northwestern Iowa. As with many urban districts, our average free and reduced lunch numbers (64%) have consistently put our district in the upper (80/20) reimbursement levels. Our school district has utilized the E-Rate program from its inception. Without this funding stream, our students would not have been able to keep pace with the changing world around us.

Our district supports a 1:1 laptop environment at the middle and high school levels. Category 2 funds allow us to build and maintain a robust wireless network that supports our efforts to deliver instruction in an online environment. Currently our at-risk high school students have the option to take their coursework in a hybrid (online and teacher–assisted) environment. Credit recovery rates grew exponentially since we offered this online option. All high school courses reside in an online learning management system, Canvas, which allows students to access coursework 24/7. We deliver all quarterly assessments online via Canvas at the rate of 20,000+ per quarter. Canvas hosts all district curriculum and professional development courses for staff.. Our district relies heavily on Category 2 funds and any reduction in those funds would impose a severe hardship on our staff and students.

Since the modernization of the e-rate program went into effect in 2014, the Sioux City Community School District put together a coherent plan that would allow us to leverage our restricted budget and limited work force and completely overhaul our districts network infrastructure. In year 1 of this cycle, we completely replaced our wireless networking equipment. We were able to eliminate a disjointed system with different buildings having different ages of equipment from different vendors with different capabilities with equipment from a single vendor. Now, every student and teacher have the same access to the same wireless system district wide. In years 2 through 5, our plans were to upgrade the wired infrastructure, allowing us to provide a system necessary to support the needs of an online school system. In year 2, we upgraded the core networking equipment in our secondary schools. This move was to support the next phases of our planned upgrades. For 2017, we have requested funding to replace the edge switches in the secondary buildings allowing us to move from a 1Gbps backbone system to a 10Gbps one. This increase will support both the wired systems as well as the wireless devices used by most of our students. Once the secondary schools are completed, our plan is to do the same things in our elementary schools. Due to limitations of both labor and budget, it would be impossible for us to perform these upgrades in a single year. This is why we have not used up our full Category 2 budget in the first three years of the five-year plan.

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 is 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 school, district or state funds.

We used our Category 2 funds to replace the wireless network throughout the district. What we had at the time was a collection of mismatched systems from various vendors. Some of the buildings had a guest access system while many did not. We had some buildings capable of accommodating 802.11b only while some could accommodate 802.11 GB. We had equipment from three different vendors with two different management platforms. Other than the high schools, none of the schools were capable of supporting a full classroom of computers without having connectivity issues. Between funding for the wireless equipment and the wiring to support it, we were able to move to a single vendor with access points in every classroom, thus allowing our students to access resources consistently and reliably. With this piece resolved, our next need was to resolve the bottlenecks in the wired infrastructure. To do this, it was necessary for us to upgrade the fiber optic backbone system in our secondary buildings and to purchase the core equipment that would allow us to support a 10Gbps backbone system in all of the buildings. In addition, we needed to upgrade the Wide Area Network (WAN) connections to the secondary buildings from a 1Gbps link to a 10Gbps one. The second year request covered the costs of installing the fiber optic infrastructure and the core networking equipment to accommodate this move. In year 3, we have proposed replacing all of the edge switch equipment in the secondary schools as the final piece in the plan. This will allow us to utilize the 10Gbps backbone system, clearing the way for even more use of the wired and wireless data communications system. Year 3 through 5 funds will replicate what we have done in the secondary schools in the elementary buildings. This modernization plan will allows our students to access to the most current resources available.

In closing, I reiterate my district’s continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students’ learning. Thank you for considering these comments.

Sincerely,

Kathleen Bottaro

Director of Technology