



Cumberland County Board of Education

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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.

Cumberland County School District is a very rural district located in south central Kentucky. Our enrollment is approximately 907 students and our free/reduced lunch rate is approximately 78% for the district.

Our district uses erate dollars to support telecommunications services that fall under Category 1 as well as Category 2 services for internal connections. We purchased new networking hardware as well as wireless network controllers during the 2014 modernization of erate when the offers of \$150 per pupil were proposed. Without these erate services our district would not be able to support the infrastructure for a 1:1 initiative for Grades 4-12. This initiative has allowed us to provide many more tools, resources, etc., to our students that we would not have had the opportunity to use. Before the upgrade, students had class time in a computer lab for one or two hours during the week on a rotational basis. With the funds provided by erate, we can now offer students equitable access to online resources due to the infrastructure now in place. Due to all classrooms having wireless capability, additional seat time for students, more online learning tools, equals better opportunities for students to succeed in core content classes while at the same time becoming a digital citizen.

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 school, district or state funds.

Our district has spent approximately 90% of the \$142,950 proposed to our district. Our district still needs approximately \$30.00 per ADA more per student to provide a reliable, robust network for our staff and students. We still have 10 network switches that need to be replaced as they are reaching the 8 year mark in age. However, as previously stated, the most recent upgrade to our district allowed us to provide capacity for a 1:1 wireless initiative to our students throughout the school district. Without this upgrade, our district could not work toward our goals and plans for the district specifically Goal 3--72% of students will demonstrate proficiency in reading and math by 2017. Without the replacement of the wireless controllers, core switch, access points, network switches, etc., we would not have been able to provide access to tools and resources needed to educate our students and prepare them for the future.

In closing, I reiterate Cumberland County School 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,

A handwritten signature in black ink, appearing to read "Ginger Garmon". The signature is fluid and cursive, with the first name "Ginger" being more prominent than the last name "Garmon".

Ginger Garmon, CIO
Cumberland County School District