

Category 2 Public Notice - WC Docket No. 13-184

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Prepared by:
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To whom it may concern:

Our Intermediate Unit is an Educational Service Agency (ESA) that serves three counties in South Central Pennsylvania. The FCC's E-rate program is vitally important to the services that we provide to our schools and school districts. One of the services that we offer is E-rate Consulting. We represent the E-rate interests of all of our clients filing for E-rate on their behalf.

In order to provide an effective comment to the FCC, we solicited the opinions of our E-rate clients. An overwhelming trend from the responses was that additional items should be included in the Category 2 Eligible Services List.

End-user devices should be included as eligible under Category 2. Sufficient broadband infrastructure is ineffective without ample access to end-user devices. Even if every classroom has multiple wireless access points, their effectiveness is diminished if the students do not each have their own device.

Hardware and infrastructure that supports voice service should be included as eligible under Category 2. Voice service is still a necessity despite E-rate's phase down of its funding. Required infrastructure to support voice services must now be financed without the aid of E-rate funds. This puts an additional strain on technology budgets. Funds that could be utilized for an improved connectivity experience may not be available in some instances.

Here is a comment on the Category 2 E-rate funding application process. This suggestion would ease the burden on applicants by simplifying this process. *The E-rate program should remove the competitive bidding requirement for Category 2 purchases.* If schools had the freedom to pick their equipment (vendor and preferred manufacturer), order it, and submit the totals for reimbursement. This would allow for improved utilization of Category 2 funds while simplifying the funding application process.

Finally, here is a comment from us as an ESA. We, as an organization, employ nearly 1,400 employees all with one goal in mind. We service our schools and districts to meet their challenges and needs.

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In order for us to effectively provide this support, we require sufficient broadband infrastructure at all of our school and Non-Instructional Facility (NIF) locations. Most or all of our NIFs serve students albeit differently than a traditional classroom setting. A few NIFs exclusively house staff members, but the majority of our NIFs have students in the facility on a regular basis. Most of our NIFs are also not recognized by our state as recognized “schools”. For this reason, they remain classified as NIFs from an E-rate perspective. Currently, Category 2 budgets cannot be applied to NIFs.

We believe that Category 2 budgets should be calculated district-wide, and then applied to any building location, school or NIF. In our instance, we hope to be able to apply our Category 2 funds to our NIFs in the same manner as our schools. Our main office is vital to our organization’s success. It is much more than a traditional Administration Office. Students and teachers regularly attend conferences and events. It also houses various Adult Education and Pre-school programs. Since it is a NIF, we are unable to use E-rate support for infrastructure that serves only our main office location.

Thank you for taking the time to consider these comments.

Please feel free to contact me if anything requires additional details or clarification.

Sincerely,



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