

Madison-Oneida

Board of Cooperative Educational Services

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DISTRICT SUPERINTENDENT

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JACKLIN G. STARKS, jstarks@moboces.org

October 20, 2017

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

Dear Chairman Pai

I am writing in response to the Federal Communications Commission's (FCC) Public Notice, which seeks comments on the Category 2 E-Rate program. I want to thank the FCC for your continued support for the E-Rate program and for the policy changes the commission adopted in 2014. The E-Rate program provides much needed critical discounts to assist schools to obtain affordable telecommunications and Internet access.

The Mohawk Regional Information Center is part of Madison Oneida BOCES. Together, we are a consortium working on behalf of 50 school districts and 4 BOCES in our 5-county region. Our region supports over 75,000 students' education, and telecommunications and Internet access play a vital role in these students' futures. Both Category 1 and Category 2 are needed for the success of these students. We have been working very hard to meet the broadband requirements since they were announced with the changes in 2014. As of today, because of the E-Rate program, all of our districts have met the Internet access recommendation. However, there is much more work to be done, particularly around Category 2. Over 80% of our districts are rural and about half of them have an E-Rate discount rate of 80% or higher. These numbers prove the need for programs such as E-Rate.

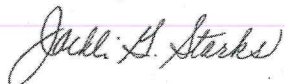
The E-Rate program is a successful program. As the FCC moves forward with this public notice, I would ask that any changes to the E-Rate program be focused on expanding a successful program that has yet to reach its full potential.

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 funding is extremely valuable and could not be replaced by school, district or state funds.

While our consortium typically has filed for Category 1 on behalf of our districts, we noticed that many of our districts were not utilizing Category 2 as they could be. Due to this, about 6 months ago, our consortium began putting steps in place to educate districts on Category 2 and the funding available. I am happy to report that we have seen an increase of filing since this time. In our region, about 28% of the districts have filed for Category 2, using approximately 41% of the allotted funding. The goal is for all of our districts to use as much of their E-Rate Category 2 allotment as possible by 2020. Category 2 is very important in making district's networks work, and for Category 1 to also be successful.

In closing, I encourage the continued support that the E-Rate program has offered in being able to access and afford the high-speed connectivity that is so essential to our students' learning. Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script, reading "Jacklin G. Starks".

Jacklin G. Starks
District Superintendent
