

**State of New Mexico  
Public School Capital Outlay Council**

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**Before the  
Federal Communications Commission  
Washington, D.C.**

In the Matter of	)	
	)	
FCC Request for Comments	)	
on Category 2 Budgets	)	
Schools and Libraries	)	
Universal Service Support Mechanism	)	CC Docket No. 02-6 WC Docket No. 13-184

**COMMENTS ON THE WIRELINE COMPETITION BUREAU  
REQUEST FOR COMMENTS ON CATEGORY TWO BUDGETS  
(DA 17-921)**

Bureau Chief Kris Monteith,

The Public School Capital Outlay Council (PSCOC) oversees a broadband infrastructure upgrades program that coordinates and provides support to K12 public schools in New Mexico.

Category two (Cat2) E-rate budgets established by the FCC Modernization Order of 2014 are essential to New Mexico public schools. The rural nature of the state favors the existence of small schools, who need robust broadband infrastructure to operate and to offer their students learning opportunities comparable to city schools.

The K12 Broadband Infrastructure Gap Analysis Report developed in 2015 as part of this program found that 98% of the K12 schools in New Mexico need Cat2 upgrades in order to meet current and future connectivity demands. The estimated cost of the upgrades exceeds the current E-rate Cat2 budgets available for many of the school locations, especially for small rural schools.

Additionally, this infrastructure must be upgraded on an approximate five-year cycle, putting another long-term strain on the schools' available funds. Lack of resources for planning and implementation makes the progress slow, yet progress is being made and the current Cat2 awards are making a significant difference.

The PSCOC strongly supports the continuation of the current E-rate Cat2 funding assistance provided by the FCC.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Abbey". The signature is fluid and cursive, with the first name "David" being larger and more prominent than the last name "Abbey".

David Abbey, Chairman

Public School Capital Outlay Council – State of New Mexico