

October 23, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S. W.
Washington, DC 20554

**RE: Wireline Competition Bureau Request for Comment on Category Two
Budgets – WC Docket 13-184 – Proceedings Docket 02-6**

Submitted by:

Robert Sniecinski
E Rate Advantage, LLC
CRN 16060670

Dear Ms. Dortch,

We perform E Rate consulting services for several hundred schools and libraries across the country. The following represents our experience subsequent to the implementation of the E-Rate Modernization Orders.

1 – The current Category 2 pre-discount budget of \$150 per student over a 5-year period is insufficient for schools to install, upgrade and maintain a functional Wi-Fi network.

2 – Over 53% of our clients have consumed in excess of 75% of their C2 budget in the past two years (2015 and 2016) leaving insufficient funds to upgrade and maintain their equipment in the remaining three years.

3 – Many schools are reluctant to invest in upgrading their technology infrastructure and are leaving the program because they can no longer rely on E-Rate funding to support their technology needs in the coming years.

4 – Approximately 65% of our smaller schools have left the program due to the limited amount of Category 1 funds and the \$150/student allotment of Category 2 funds being insufficient to pay for the Category 2 hardware necessary to upgrade their networks.

The changes to the program under the E-Rate Modernization Orders, though necessary to manage the financial stability of the program, have had what appear to be unforeseen consequences that hinder many of our schools from installing and maintaining a sound technology infrastructure.

Conclusions:

1 – Increase the per student budget.

2 – Decrease the budget window from 5 years to 3 years.

3 – In addition to the budget of \$150/student, have a separate budget for cabling and a separate budget for maintenance.

4 – Reinstate the voice discount with a maximum discount of 50%.

Sincerely,

Robert Sniecinski
Managing Partner
E Rate Advantage
CRN 16060670