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October 23, 2017

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

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.

Allegheny County Public Schools is a rural county in Western Maryland with a National Lunch Program population of over 56%. E-Rate has historically provided a reimbursement on Infrastructure of up to 90%. Infrastructure purchases include Network switches, routers, and UPS units Wireless access points. The reimbursed funds are then provided to support technology in the classroom. Without these funds, classroom technology will be greatly hampered to the tune of \$350,000 to \$400,000 annually.

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 in 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.

Allegheny County Public Schools plans to utilize all of its E-Rate Category 2 allotment by 2020 with replacements to the Network switches, Wireless Access Points and Uninterruptible Power Supplies that are currently at their end of life, over 8 years of service. ACPS currently has full wireless to the classroom where each and every classroom was outfitted to contain at least 1 WAP. Replacement units are made possible by the E-Rate program; however, if this funding is eliminated, we will be going backward in our ability to sustain our high level of Internet access to the classroom by focusing use in only select classrooms or labs. Our teachers have become very tech savvy in using the many resources provided in the Cloud. For example, teachers and students have been using Discovery Education streaming as Techbooks thereby eliminating the need to purchase textbooks that are obsolete before distributed. The Techbooks provide not only online access any time of the day but are updated regularly to keep the content

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current. Along with this, we use an online benchmarking system called Engrade which has provided our teachers and students a method to assess how students are understanding instructional content prior to the mandatory state testing. This product incorporates state standards in the local assessment and provides our teachers with feedback on which topics need further addressed before the end of year PARCC assessment. This online only assessment is provided to English Language Arts, Mathematics, Science, Social Studies, as well as other non-core content to students from grades PreK – 12. PARCC is administered 100% online in our county. Without the consistency and ability to provide an online experience, we would be greatly reducing the level of our students' abilities to become college and career ready.

In closing, I reiterate my 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 blue ink, appearing to read 'D. Cox', with a large, stylized 'D' and a cursive 'Cox'.

David A. Cox, Ed.D.
Superintendent of Schools

DAC/dmh