



DENISON INDEPENDENT SCHOOL DISTRICT

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

October 19, 2017

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 addressing this issue, I want to thank the FCC for your continued support for the E-Rate program and the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides vital discounts that help schools like ours obtain affordable telecommunications and internet access for our students.

Denison ISD is a rural school district that serves roughly 4,600 students in an economically challenged community of around 23,000 predominantly middle and lower income citizens. The district is comprised of nine academic campuses, an Administration Campus which provide vital educational services for teachers and students, and a Service Center that serves as the training and staff development site for Denison ISD's more than 700 employees. Sixty-four percent of our students are coded as living in poverty (based on free and reduced meal service data), and that number continues to rise annually. Unfortunately in Texas, inequity in State Funding continues to create financial stress for many districts. Example in point: Denison ISD receives roughly \$11,000 per pupil per year in State funding, while Barbers Hill ISD (a district comparable in size with only 17.2% economically disadvantaged students) receives almost \$15,000 per student per year. As you can see, E-Rate dollars are thus very vital to the successful education of our Denison students, helping close the gap created by inadequate and inequitable school finance. E-Rate dollars at Denison ISD have funded or partially funded file servers (when they were eligible), routers, LAN switches, cabling, cabling components, wireless access points and controllers, internet access, local phone service and long distance service. In turn, this has freed up vital money that allows us to purchase personal devices, COWS (Computers on Wheels), laptops and tablets, internet connectivity, professional development (on site and/or through online services), credit recovery curriculum, online learning programs, internet access to Advanced Placement Courses and other internet-dependent programs such as online remedial and tutorial programs, and much more. Our immediate and long-term goal is to meet the technology needs of at-risk students so they can learn and succeed at the same level as their peers; and to provide the best, most advanced educational opportunities for all Denison children.

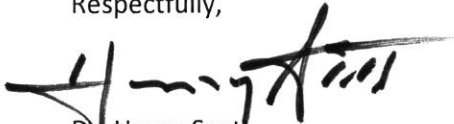
The E-Rate program, which has been proven to work, is a program that is succeeding in its mission to help educate and train today's young people to be tomorrow's successful workforce and dynamic leaders. As the FCC moves forward with this public notice, it should be emphasized that changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring that the FCC remains a good steward of the very positive changes adopted in 2014, allowing those changes to progress and play out as intended.

E-Rate has contributed a total of \$3.7 million for implementing, upgrading and expanding DISD's network infrastructure since 1998. Denison ISD is not where it needs to be, but we are much closer to providing adequate internet access for all students, thanks to E-Rate. However, we need more money, not less money. Specifically, we need at least double the current allotment of \$150 per student to continually and adequately maintain, upgrade and expand our network's afore-mentioned infrastructure, which will allow our school district to continue to spend District money on such essential but non-eligible E-Rate items as computers, printers, scanner, projectors, SMARTboards, document cameras and other items. The connectivity provided by E-Rate, in both our schools and libraries, has drastically improved educational experiences throughout our district by allowing us to provide high bandwidth over wired and wireless access in every Denison ISD classroom and office. In short, throughout our economically stressed school district and community, the immediate and long-term value of E-Rate is truly priceless.

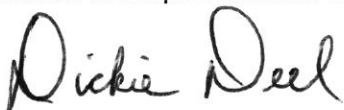
Again, we don't need less money -- we need more money, to be invested in the right places. Rather than entity-specific E-rate funding, we need to return to District E-Rate funding which allows districts to distribute funds according to campus needs, to accomplish the task of providing ever-changing technology to all students. It is also important for E-Rate funding to be available for Non-Instructional Facilities which are vital to accomplishing the end goal of facilitating successful learning for all students. Additionally, the cost of CIPA/Internet Content filters, which are mandated by law, have soared since the mandate was issued. It is our hope that E-Rate funding will be made available to help cover the cost of filters as well. We also very much hope that the cost of servers and phone services/telecommunications might once again be included in E-rate, as school Districts can't function on email alone.

In closing, I reiterate Denison ISD's continual strong support for and reliance upon the E-Rate program that allows us to access and afford the high-speed connectivity that is so vital to our students' learning. Thank you very much for considering these comments.

Respectfully,



Dr. Henry Scott
Denison ISD Superintendent of Schools



Dr. Dickie Deel
Denison ISD Director of Technology