



April 9, 2018

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Modernizing the E-rate Program for Schools and Libraries – WC Docket No. 13-184
Schools and Libraries Universal Service Support Mechanism – CC Docket No. 02-6
Ex Parte Submission

Dear Secretary Dortch:

AdTec, Inc. supports the April 9, 2018 letter by the Schools, Health & Libraries Broadband Coalition (“SHLB”) regarding the recent concerns over the FCC Form 470 drop-down menu changes initiated by USAC in August 2017. As discussed in several recent filings, initiated by the *ex parte* notice on March 16, 2018 submitted by the Ohio Information Technology Centers, and subsequent *ex parte* letters from the State E-Rate Coordinator’s Alliance (SECA), Funds for Learning, LLC, CSM Consulting, and Kellogg and Sovereign concerning the problematic and inconsistent guidance from USAC concerning the drop-down menu and the FY 2018 approach for requesting competitive bids for various Internet access service options.

We join SHLB’s support for SECA’s recommendation that there be a hold harmless solution for FY 2018 FCC Form 471s that allows applicants to be approved for funding of an internet access service provided that the applicant posted an FCC Form 470 for at least one of the drop-down menu options that could have covered an internet access service (Internet Access & Transport Bundled, Leased Lit Fiber, or Internet Access: ISP Service Only).

We also join SHLB in encouraging the FCC to quickly direct USAC to modify the drop-down options for the FY 2019 FCC Form 470 in a way that will eliminate the confusion that was created by the FY 2018 changes. We heartily support the SHLB preferred correction of reinstituting a single “Function” for the form that makes it clear that the applicant seeks internet access with no prejudice to any delivery medium. The SHLB term “Internet Access Bundled with Circuit (including Fiber and Non-Fiber circuit such as cable modem, DSL, etc.)” is a straightforward plain language description of this type of service, easily understood by all applicants.

Respectfully submitted,

Charles F. Hobbs, Ph. D., President
AdTec, Inc.