



LEADERSHIP • TECHNOLOGY • INNOVATION • LEARNING

April 28, 2017

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554

**RE: WC Dockets 10-90, 16-106, 11-42, 13-184**

Dear Chairman Pai,

On behalf of the [State Educational Technology Directors Association](#) (SETDA), I am writing to you in appreciation of your letter to USAC outlining your recognition of challenges in the E-rate application process and to share with you additional concerns of our state leaders. SETDA is a national, non-profit organization that supports state education agency leaders from all 50 states, the District of Columbia, American Samoa and Guam focused on using technology – including the high capacity broadband access made possible in part by the E-rate program - for improving teaching, learning, and school operations.

Our state members have expressed serious concerns with the recent questionnaire that was sent by USAC to over 100 districts that applied for funding to support special construction for fiber installation. Of particular concern is the timing of the questionnaire as well as the level of detail of the questions. While the details might be appropriate for self-provisioning applicants as they would be in control over the installation, many of the questions would be incredibly difficult to answer for special construction applicants who rely on providers who know the full scope of the work. The requirement to complete this questionnaire so late in the process and potentially deny the funds after these applicants have followed all of the rules laid out in the training and application process would be unreasonable.

SETDA has a track record of advocating for increasing robust broadband access both in and out of school to best prepare all students for college and careers. SETDA staff and members provided comprehensive input during the E-rate Modernization process and SETDA published an E-rate Modernization toolkit to support state and districts. In 2016, SETDA released the [State K12 Broadband Leadership: Driving Connectivity and Access](#) report and [The Broadband Imperative II: Equitable Access for Learning](#). These reports support state level leadership for broadband implementation, and each expand on earlier recommendations to increase access to

high quality broadband access to all students both in and outside of school. We are concerned that the efforts to gather the depth of detail from providers required in this latest questionnaire will discourage infrastructure improvement projects for school and communities. Providers typically will lay more lines when a trench is open on their own dime. If this practice is curtailed, the quality of connectivity in schools will suffer.

We respectfully request that any changes to guidance not affect current applications and applicants should not be held in harm's way when they followed the rules, regulations, and guidance in place at the time the application was submitted. Applicants need to be able to depend upon the process laid out in training.

Sincerely,

A handwritten signature in cursive script that reads "Tracy S. Weeks".

Tracy S. Weeks, Ph.D.  
Executive Director  
SETDA