

Fish & Richardson P.C.
1425 K Street, N.W.
11th Floor
Washington, DC 20005
202 783 5070 main
202 783 2331 fax

June 23, 2016

Edwin N. Lavergne
Principal
lavergne@fr.com
202 626 6359 direct

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: ***NOTICE OF ORAL EX PARTE PRESENTATION***
Lifeline and Link Up Reform and Modernization (WC Docket No. 11-42);
Telecommunications Carriers Eligible for Universal Service Support (WC Docket
No. 09-197); Connect America Fund (WC Docket No. 10-90)

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(2) of the Commission's rules to report that on June 23, 2016, Dr. Jeffrey C. Moss, Superintendent of Beaufort County School District, Phyllis White, Chief Operations Officer of Beaufort County School District, Mark Chauhan, Director of Technology of Beaufort County School District, Donna Balaguer, outside counsel to Beaufort County School District, and the undersigned, outside counsel to Beaufort County School District met with Trent Harkrader, Associate Chief, Wireline Competition Bureau, Jodie Griffin, Attorney Advisor in the Telecommunications Access Policy Division of the Wireline Competition Bureau, Nathan Eagan, Attorney Advisor in the Telecommunications Access Policy Division of the Wireline Competition Bureau, and Allison Baker, Senior Data Analytics Manager, Office of Strategic Planning and Policy Analysis. During the meeting, we presented the attached three-phase plan to close the homework gap in Beaufort County within 24 months.

Respectfully submitted,

/s/ Edwin N. Lavergne

Edwin N. Lavergne

cc Trent Harkrader
Jodie Griffin
Nathan Eagan
Allison Baker



**Beaufort County School
District
Lifeline Aggregation Proposal**

June 23, 2016

Introductions



- ❖ Dr. Jeffrey Moss, Superintendent, Beaufort County School District
- ❖ Mark Chauhan, Director of Technology, Beaufort County School District
- ❖ Phyllis White, Chief Operations Officer, Beaufort County School District
- ❖ Ed Lavergne, Outside FCC Counsel, Fish & Richardson
- ❖ Donna Balaguer, Outside FCC Counsel, Fish & Richardson

Overview



- ❖ The Commission asked for assistance from schools and other trusted community-based organizations to help subscribers get connected to broadband.
- ❖ The Beaufort County School District (BCSD) has made great strides connecting students *in the classroom* to the Internet. But, it still has a significant problem connecting students *outside the classroom*.
- ❖ BCSD has developed a novel three-phase plan to close the homework gap by aggregating student households that are eligible for (and wish to receive) Lifeline broadband support.
- ❖ Aggregation will incentivize qualified vendors to build and maintain a “Wi-Fi dome” over most of Beaufort County.
- ❖ Aggregation offers other advantages as well.

Background /Demographics

- ❖ BCSD serves 22,000 students in an area covering nearly 600 square miles, including many remote communities on Sea Islands along the South Carolina coast.
 - 21 elementary schools, two PK-8 schools, one K-8 charter school, six high schools, a career center, and an alternative program.
- ❖ Beaufort County is one of South Carolina's fastest growing communities, and its population is very diverse.
 - Approximately two-thirds of BCSD students qualify for free or reduced price meals.
 - 59% minority (29% African-American and 25% Hispanic).

The Homework Gap

- ❖ Over 6,000 BCSD students don't have broadband access at home – either because they cannot afford it or because they live in remote areas without Internet service.
 - These students are at a significant disadvantage in completing homework assignments and competing with students from more affluent families.
 - It's not unusual to see students from economically disadvantaged neighborhoods searching for open Wi-Fi signals after school hours.
- ❖ BCSD has developed a novel three-phase plan to close the homework gap. But, it needs to aggregate Lifeline benefits to successfully implement the plan.

Phase 1 – Connect2Learn

- ❖ Phase 1 (called “Connect2Learn”) was completed in 2015. Connect2Learn is the name of the digital mobile learning program, which connects each BCSD classroom to Wi-Fi and provides over 20,000 students with mobile tablets and laptop computers in grades K-12.
 - Students in grades 6-12 are permitted to take the devices home at the end of each school day.
 - All devices (whether used at school or at home) are filtered to block access to inappropriate content.

Phase 2 – Wi-Fi Hot Spots

- ❖ In Phase 2, BCSD will deploy approximately 80 Wi-Fi hotspots in select parks throughout Beaufort County.
 - Hargray Communications, a local telecommunications service provider, has proposed to build the necessary facilities and leverage its existing fiber-based network in the area.
 - This will close the homework gap for approximately 50% of BCSD's student population that live within one mile of these hot spot locations.

- ❖ Costs and Timeline
 - Estimated cost of construction is \$2.8 million, which will be paid by BCSD. Estimated construction time is 12 months.
 - Estimated recurring service costs are \$800,000 per year, which BCSD hopes to pay through aggregation of Lifeline funds.

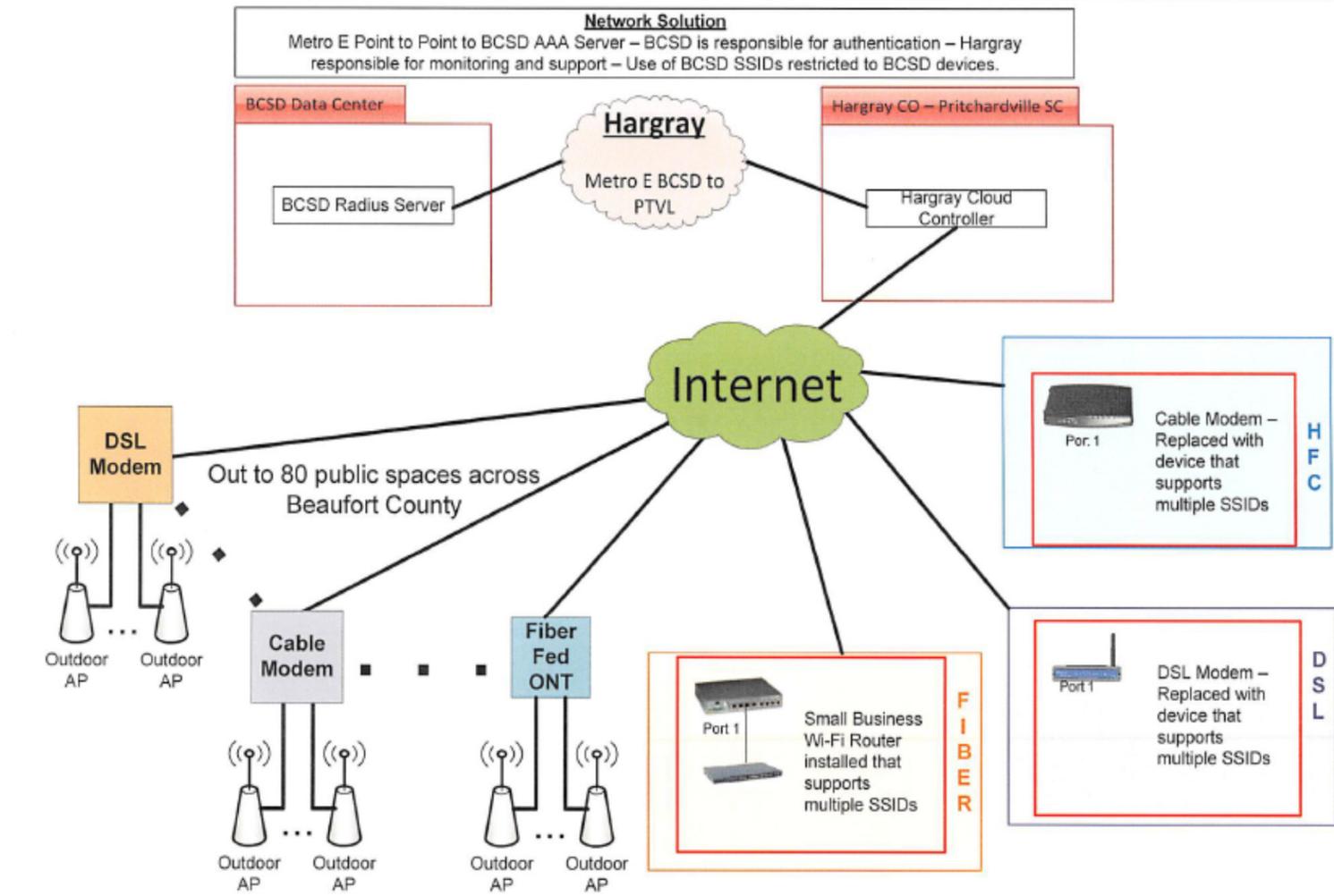
Phase 3 – Wi-Fi Dome

- ❖ In Phase 3, a Wi-Fi dome will be constructed that covers 85% of Beaufort County.
 - Existing Hargray business and residential customers will receive upgraded equipment that will support multiple SSIDs. A new SSID will be made available exclusively to BCSD students.
 - It is estimated that approximately 17,600 students will be able to obtain off-campus Internet access once the dome is constructed.

- ❖ Costs and Timeline
 - Estimated cost of construction is \$3.8 million, which will be paid by BCSD. Estimated construction time is 24 months.
 - Estimated recurring service costs are \$600,000 per year, which BCSD hopes to pay through aggregation of Lifeline funds.

Phases 2 and 3 Overview

Solution Details: Overview



Cost Summary

- ❖ Phase 2 Construction ~\$2.8 million
- ❖ Phase 3 Construction ~\$3.8 million
- ❖ Total Construction ~\$6.6 million
- ❖ Annual recurring service cost ~\$1.4 million
 - BCSD is prepared to pay all Phase 2 and Phase 3 construction costs.
 - However, additional resources are needed to pay recurring broadband service charges estimated at \$1.4 million per year. This is where Lifeline benefits can help.

How Aggregation Can Help

- ❖ The homework gap can largely be closed in Beaufort County if BCSD can aggregate student households that are eligible for Lifeline broadband support.
 - More specifically, BCSD seeks the ability to aggregate its eligible student households so that BCSD can enter into a contract with Hargray Communications (as Hargray's customer) and use aggregated Lifeline funds to pay the estimated \$1.4 million per year in recurring broadband service charges.
- ❖ There are several advantages to aggregation as opposed to having student households individually apply for Lifeline benefits.

Advantages to Aggregation

- ❖ **Attracts Qualified Vendor.** Aggregation of eligible households will allow BCSD (as the customer) to commit to monthly recurring service costs, which will attract a qualified vendor to construct and maintain the network.
- ❖ **Better Service.** Aggregation will allow BCSD to offer unlimited broadband usage with BCSD acting as the network manager, which is likely better than individual subscribers could do on their own at \$9.25/month.
- ❖ **Better Subscription Rate.** Aggregation will allow BCSD to serve as a community anchor in reaching out to students and families, which will likely result in a higher subscription rate.
- ❖ **Better Coverage.** Aggregation will ensure that all students within the network footprint will have broadband access, with no student left behind.

Questions/Next Steps

❖ For more information, please contact:

➤ Ed Lavergne, Principal
Fish & Richardson P.C.
1425 K Street, N.W.
Washington, D.C. 20005
Direct: 202-626-6359
lavergne@fr.com

➤ Donna Balaguer, Principal
Fish and Richardson P.C.
1425 K Street, N.W.
Washington, D.C. 20005
Direct: 202-626-7719
balaguer@fr.com