

LAWRENCE COUNTY SCHOOL SYSTEM

Johnny McDaniel, Director of Schools
700 Mahr Avenue • Lawrenceburg, TN 38464
931-762-3581

June 21, 2018

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

Re: *Transforming the 2.5 GHz Band – WT Docket No. 18-120 -*

Dear Ms. Dortch,

I am writing to you on behalf of the Lawrence County School System to address the need for broadband services within our community. As you are aware, many rural communities – including Lawrence County, in Tennessee do not have access to fast and reliable broadband services. Unfortunately, this shortage impacts Lawrence County School System's educational mission. Education is an extremely important and powerful tool that should not be pushed to the side. The FCC's new rules should focus on providing the opportunity to potentially thousands of schools within rural communities who haven't been given the same chance as other institutions in the past. With our constantly evolving technology-driven world, it is vital to provide educational institutions with the resources they need to teach the nation's current and future leaders.

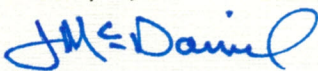
While there is no complete solution to this problem, a very effective and low-cost step is for the FCC to issue new Educational Broadband Service (EBS) licenses in currently unlicensed areas. The Consensus Plan put forth on June 6, 2014, by the National EBS Association, the Catholic Telecommunications Network, the Hispanic Information Telecommunications Network and the Wireless Communications Association International (WCA) reflects the wisdom of the stated parties that have successfully developed the band which has brought value to educators, rural wireless operators and rural fixed wireless broadband customers. The FCC should consider the Consensus Plan as a good source for any proposed changes to the rules. The Lawrence County School System supports the Consensus Proposal to the extent which would allow the FCC to issue one or more new licenses covering Lawrence County, Tennessee. The issuance of new EBS licenses would allow for either direct construction by the Lawrence County School System and/or leasing of excess capacity to commercial operators who could handle network construction. The availability of fast and reliable Internet services within our community, will improve the educational experience of our students, help drive economic development in our rural community and may also generate royalty income to our school.

On April 18th, 2018, the FCC proposed three filing windows for Educational Institutions and Tribal Nations to apply for new licenses. Following the three windows the FCC proposed it will make remaining licenses available to commercial operators using a competitive bidding strategy. For years the existing licensing system has worked well and has been benefitting schools, communities, lessors and commercial operators. The goal is to preserve the educational nature of this spectrum and to give a chance to rural communities such as ourselves in Lawrence County, TN, who have not been given a sufficient opportunity to acquire this spectrum. A competitive bidding strategy will not work well for the Lawrence County School System rural wireless internet service providers and rural communities as schools are not financially or procedurally prepared to acquire spectrum through auctions. Educational Institutions have proven themselves to be the best choice for a holder of this spectrum, as they are most likely to lease excess capacity of licenses to local rural internet service providers, who will develop sufficient wireless coverage within the immediate rural community, rather than a national commercial operator who will focus only on population rich urban areas. Schools that have not been given the chance to acquire a license in the past should be allowed to apply on a first-come-first-served basis and the window should close after the first successful application for a given license. Ultimately, Educational Institutions such as ours located in Lawrence County should have access to spectrum on terms similar to what existing licensees and lessees have benefited from for many years.

On behalf of the Lawrence County School System I urge the FCC to address the issue that vast areas – more than half of the land area of the U.S. – are not covered by EBS licenses. The goal is to preserve the educational nature of this spectrum, to expand current license area, and to issue new licenses in current EBS Whitespace. We request that the FCC act to facilitate the positive impact these new licenses can have in our community. Issuing new licenses per the 2014 Consensus Proposal is the quickest and most cost-effective way to promote broadband access in rural America and requires only the reconciliation of FCC rules.

I appreciate your consideration in this matter.

Thank you,



Johnny McDaniel
Director of Schools