July 10, 2019

Ms. Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: Ex Parte – In the Matter of Petition for Rulemaking to Amend and Modernize Part 54 of the Commission’s Rules; RM-11841; CC Docket No. 02-6; WC Docket No. 13-184

Dear Ms. Dortch:

On July 10, 2019, representatives of three Texas Education Service Centers (ESC), the Association of Educational Service Agencies (AESA) , and AASA, The School Superintendents Association—including Dr. Gordon D. Taylor (Executive Director, ESC 10), Dr. Casey Callahan (Executive Director, ESC 15), Ginnie Harwood (ESC 15), Randon Lance (ESC 15), Shane Fields, (Executive Director, ESC 14), Mike Wetsel (ESC 14), Robb McClellan (ESC 14) and Noelle Ellerson Ng (AASA/AESA)—spoke with D’wana R. Terry, Bryan Boyle, Hailey Stefan, Stephanie Minnock, and Gabriella Gross, all of the FCC’s Wireline Competition Bureau.

During our meeting, we discussed our views on the Petition for Rulemaking to Amend and Modernize Part 54 of the Commission’s Rules to Prevent Waste in the Universal Service Fund E-Rate Program. Regarding the petition, we relayed an overview and summary of recent E-Rate applications on behalf of the three education services centers, applications that involved the applicants seeking a regional approach/bid to provide broadband connectivity to the local education agencies they serve. The applicants detailed their compliance with E-Rate and Texas state/local procurement rules as it related to the RFP process, their efforts to be responsive to LEA needs/requests (as required by Texas ESC guidelines), their strategy as informed by the current rules and incentives within the E-Rate program and provided a comprehensive response to the content of the petition, including addressing questions advanced by the Wireline Competition Bureau.

Respectfully submitted,

Noelle Ellerson Ng

Associate Executive Director, Policy & Advocacy

AASA, The School Superintendents Association

Legislative Liaison, AESA