**Notice of Proposed Rulemaking Comments**

**Comments by Jerry Steinberg, Telesolutions Consultants LLC – Thursday, July 25, 2019**

Dear Sir or Madam,

This is my commentary to the “Notice of Proposed Rulemaking” released on July 9, 2019, on WC Docket 13-184.

We are an Illinois based E-rate consulting company and member of the E-rate Management Professionals Association EMPA that has worked with the E-rate Program since its inception in 1997 and we have seen the growth and changes in the program over its 22 years.

We have watched the program morph from single dialup access to the Internet per school to robust Fiber and Wireless connections to the world.

Prior to the 2015 E-rate Modernization, Internal Connections were never a given; with no predictable budgets for the Priority 2 Infrastructure; the chances were never good for even the poorest, or neediest, school districts to receive funding.

In my view, the best change in the E-rate Program was the 2014, 5-year, Modernization of the Program.

Great additions of the 5-year Modernization plan were: a finite, predictable Category 2 budget per individual school; a limited, but effective Eligible Services List; and more Program Integrity Audit Scrutiny of Applications, virtually eliminating waste, fraud and abuse.

1. **Finite Category 2 Budgets per School**

A per school budget allows equity to ALL schools in a school district. We find that a districtwide budget might “simplify” paperwork but would allow the higher-grade level schools, e.g., middle or high schools to “load-up” on technology infrastructure to the detriment of other schools in the district.

Having a finite, predictable budget for all schools in the United States promotes steadiness, equality and the orderliness of planning.

Continuing on and keeping the E-rate Program permanently as it is today will promote planning, allow schools to budget for their future needs and continue the vast improvements that technology brings to the children’s learning experience.

1. **Program Integrity Audit/PIA Reviews**

One of the most significant aspects of the E-rate Modernization Program has been the increased vigilance of the E-rate reviewers. We have noticed and applaud the questions asked about Duplicative Services; on the eligibility of Category 2 equipment and services and generally, overall, the more vigilant reviews of all applications.

PIA has gotten everyone’s attention and has put applicants on notice that there are no grey areas of the Program.

1. **New Services to Consider**

As E-rate looks to the future, we feel it should look at a few newer and more impactful infrastructure and services. Our school districts have told us, nearly unanimously, that adding “Security Infrastructure” would be extremely helpful.

Unfortunately, today we all know of the security issues related to schools and the need for increased safety and security within and outside of the school buildings.

We feel that security infrastructure and installation and coordination services should be added to the Category 2 Eligible Services List or ESL.

As an example, presently, Fiber Optic and Category 6 type Cabling are eligible only for Data Services and not for Voice or Security Services.

A case in point, today when writing bid specifications for new structured wiring systems, we separate out ineligible Security Cables, related termination hardware, installation and project management costs; We feel this infrastructure should be included in the Eligible Services list..

We feel strongly that adding security infrastructure such as cabling, termination equipment and the installation of services is extremely needed and welcomed in our school districts.

Devices such as Cameras or Controllers often are needed but we feel should not be eligible, consistent with E-rate being a program focused over the years on Infrastructure and never end-user Devices.

**Summary**

E-rate has been a gamechanger in moving schools to world-class levels in technology use and educating our children.

We feel the present E-rate Modernization Program has been VERY effective, has provided equality to ALL schools and that the overall program should continue with some important tweaks and additions.

Another 5-year commitment would provide stability in planning and budgeting for the future. A 5-year buying cycle allows schools a natural change and upgrade of Wireless Access Points and Data Switches which are the very heart of a schools’ technology system.

Thank you for continuing the E-rate program and moving it into the future.

Respectively,

*Jerry*

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