



Appleton Area School District

Preparing Our Students for Their Future

Every Child, Every Day

Appleton Board of Education

Kay S. Eggert, President; Diane S. Barkmeier, Vice President; James R. Bowman, Treasurer
Barry P. O'Connor, Clerk; Alvin T. Dupree, Member; Leah C. Olson, Member; Deborah C. Truymen, Member

July 29, 2019

Dear Chairman Pai and Members of the Commission,

We are writing to you today on behalf of the Appleton Area School District (AASD) and our Board of Education in regards to the FCC's Notice of Proposed Rulemaking to establish an overall cap on the USF and a sub-cap on the E-Rate and Rural Health Care programs. We strongly urge you to abandon this proposal.

We are the sixth largest school district in the State of Wisconsin serving over 16,000 students. E-Rate has been a crucial program in our district, providing almost \$1.3 million in reimbursements over the past five years. Over the same time period, our district and taxpayers committed to providing laptops to every high school and middle school student in our district. E-Rate dollars have helped us update our district's broadband infrastructure so that we can fully leverage our community's investment. As you well know, our ability to effectively utilize new technologies depends on the robustness of our broadband infrastructure.

Placing a cap on USF is against the intent of Congress, unnecessary, and jeopardizes the future of the E-Rate program.

This proposal would force the four programs funded under USF, including E-Rate, to battle for funds if the overall cap is reached. The original legislative goal was to provide four distinct programs, each with specific funding. Each of the four programs, including E-Rate, already have their own caps in place to ensure funds are being utilized in an efficient manner. An overall cap only complicates the programs and creates potential problems down the road. The proposal to merge spending caps for E-Rate and Rural Health Care programs into a single cap is also against the clear legislative intent found in the Telecommunications Act of 1996.

We are joined in our concerns by the U.S. House of Representatives, who expressed their strong opposition to this effort through their unanimous passage of House Amendment 483 to H.R. 3351, the FY2020 Financial Services and General Government Appropriations Act, which prohibits the FCC from implementing this rule.

Our administration and board would face uncertainty when planning our budget if this rule is adopted.

If a cap is enacted, the four programs will be uncertain each year as to how much support they can rely on from USF. Intentionally placing uncertainty each year on the stability of the E-Rate program makes it difficult for us to plan our budget, as well as commit to larger scale technology projects that require a multi-year investment.

The FCC should be doing more, not less, to help students connect to broadband.

While E-Rate has made a tremendous difference in helping our students access broadband in our district's buildings, many of our students face barriers accessing broadband outside of school. The "digital divide" that exists in our society, and its potential negative impact on student academic success, is of increasing concern for us as a district. The FCC should be exploring ways to strengthen E-Rate and expand other opportunities for students to connect to high-speed broadband outside of school so that all students can equally enjoy the educational benefits provided by new technology.

Sincerely,

A handwritten signature in cursive script, reading "Kay Eggert".

Kay Eggert
School Board President

A handwritten signature in cursive script, reading "Leah Olson".

Leah Olson
AASD School Board Member &
Legislative Liaison