July 29, 2019

Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,   
Washington, DC 20554

Dear Chairman Pai,

I am writing today in response to the Federal Communications Commission’s (FCC) Public Notice which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate. Before delving into my response to the proposed changes, I want to thank the FCC for its continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

The Jurupa Unified School District (JUSD) is located in Riverside County. The district boundaries encompass the city of Jurupa Valley and a small segment on the Eastern border of Eastvale. The district currently operates 16 elementary schools, one K-8 school; three middle schools, three comprehensive high schools, a continuation high school, and an adult education program. Jurupa USD serves 19,344 Transitional Kindergarten through grade 12 students with 5,948 (30.7%) identified as English learners, 2,140 (11.1%) receiving special education services, 14,775 (76.4%) identified as Socio-economically Disadvantaged (SED), and 237 Foster Youth. Most students served by JUSD are Hispanic (16,678/86.2%), White (1,610/8.3%), or Black/African American (367/1.9%), with other races representing less than 4% (Asian 226/1.2%, Pacific Islander 53/.3%, Filipino 85/.4%, and American Indian 25/.1%). Our districtwide unduplicated count is (14,868/77.9%) with all of our schools ranging from 51.31% to 95.11%.

Our district relies on E-rate dollars to fund critical infrastructure upgrades, network equipment, internet data transmission and access. Specifically, E-rate dollars fund data transport to and from our district network hub and delivered to multiple serving sites as part of a wide area network.

In the fall of 2015, Jurupa Unified launched a pilot Digital Gateway initiative. By the fall of 2016, the district equipped each student in grades 2-12 with a Chromebook to take to and from school. In the Spring of 2017, all TK-1 students were provided a Chromebook for use in the classroom. By providing a 1:1 program, JUSD gives every TK-12 student – regardless of background or income status – access to current technology, along with guidance in digital citizenship. The key factors that lead to a seamless implementation included: network upgrades, device

selection and support, professional development and a district-wide culture of digital literacy and appropriate digital citizenship. E-Rate dollars were essential to make this initiative a success.

The E-Rate program, and the broader USF program, is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role in the rapid and significant expansion of connectivity in schools, and we are concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

We are opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband). A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet

to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program

that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

We are counting on E-Rate dollars to fund critical network equipment that is needed to continue to support the Digital Gateway 1 to 1 Chromebook initiative as well as many CTE and college and career initiatives. Without this funding these network upgrades will be out of reach and unaffordable.

In closing, I reiterate my district’s continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students’ learning. Thank you for considering these comments.

Sincerely,

Joshua Lewis

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