



## TECHNOLOGY SERVICES

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July 29, 2019

Federal Communications Commission  
Washington, D.C. 20554

To Whom It May Concern,

I am seeking to comment on moving from a per-school or per-library budget to a per-district or per-system budget for category two services, the funding cap and term.

### **Per-student vs per-district funding:**

I have been involved in the Category 2 Erate process for many years with public school districts including the current 5 year period method for category 2.

I recommend changing from a per-school budget calculation to a per district calculation. This will make the calculations and tracking much easier to figure out. The per school method is complicated to manage and often hard to understand. Planning is also more involved when each campus has to be calculated individually. I work for Oakland Unified School District and we have a total of 114 entities. As student populations change, we have had to open and close schools to meet these shifts. I currently maintain a complicated spreadsheet to manage which sites have budget and which do not. Given that the budget for each site is recalculated each year, this often means that schools which do not need upgrades have a large increase in funding, or we choose to spend what little money we can get through our general fund to upgrade sites that are underfunded by Erate to the detriment of others. For example, in the 2017-18 funding year, the cost to upgrade several of our middle schools added over \$150,000 in additional costs to the district as we could not meet their needs due to the \$120/student cap being expended, so we had to drop 10 other schools out of our Category 2 project. With a districtwide budget, we could allocate funds to the sites most in need if this is moved to a per district calculation. Small schools are harmed the most by this current method.

Additionally, the current Form 21 last year ended up with over 70,000 lines due to the need to allocate by site. This is not an efficient use of our time or yours in the administration of this program. Please consider removing complexities as they add cost for both districts and USAC. If the budget is district wide, it will allow for the more efficient use of the funds to meet the intended purposes.

### **Funding cap and term:**

The current \$150 per student needs to be raised to meet rising costs. Initially, \$150 per student seemed like an adequate amount to fund infrastructure needs, but over time the cost of equipment, annual licensing, tariffs and support has outpaced this cap to funding. Also, in practice the \$150 is multiplied by the discount level of the district which reduces the funding available. I recommend that you raise this funding level to match current fund balances in order to reach more schools and students. Raising the minimum for small schools is a good first step in this direction as the current level is often too small to support their needs.



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I recommend setting a five year budget that has a firm start and stop date, not rolling from the first year used. Extending the budgets each year inadvertently harms districts that chose to participate in Year 1 as not enough money is left over to do anything else after Year 5.

Again, this adds complexity to the program. Adding specific start and stop dates for each five year period and resetting funds will add an incentive for districts who have not participated to begin accessing the Erate program.

The key takeaways here are 1) remove complexity; 2) change to a per student per district funding model; 3) raise the per student allotment; 4) raise the per school allotment for small schools and 5) use a set 5 year budget with defined start and stop dates.

Thank you for your consideration of this change.

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