



7/29/2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW, Washington, DC 20554

Re: CC Docket No. 06-122;

Dear Ms. Dortch:

On behalf of Linn Benton Lincoln Educational Service District, I would like to submit comments in opposition to the Notice of Proposed Rulemaking to establish a cap on the Universal Service Fund.

The E-rate program is essential for schools and libraries to obtain affordable internet access and distribute this access to our students and patrons. Speaking from the education sector, I can say that without the E-rate program our schools would not be able to meet the technological needs of today's students. The internet has become an invaluable source of information and provides unique opportunities for students to learn. Making internet access equitable for our students however, is a struggle that many districts face. While the funds obtained through the E-rate program help offset the costs, there is still more work to do. Our districts are still far from meeting the connectivity goals set by the Federal Communications Commission (FCC) as part of the E-rate Modernization Order and it is hard to imagine that an additional cap on funding will help us to achieve these goals.

My agency serves twelve school districts in three counties, most of which is rural. It is critical for the students of these small, rural communities to have ubiquitous access to Internet. Curriculum today is often online, with textbooks being digital and providing links to additional content, videos and updates. Without universal Internet access, for example, the students in the districts I serve will not have equitable opportunities. Districts need Category Two funds to make access points, wireless controller systems, cabling, and connections possible.

I am concerned that the Notice of Proposed Rulemaking States that, "In funding year 2018, the E-Rate cap was \$4.06 billion and demand for actual support was \$2.77 billion." I believe a reflection in how demand changed is in order as there is now a spending cap placed on applicants in the Form of Category Two Budgets. In funding year 2015 the demand for E-rate support was \$3.9 billion even with a drop in the number of applicants participating in the program. This decline seems to directly correspond with the decrease in available Category Two Budgets and not with a true decline in demand or need. Likely, many applicants could have benefited from having access to these additional funds to help their districts meet the connectivity goals set by the FCC, but they were unable to access these funds due to the spending limitation that comes with the Category Two Budget approach. Prior to the introduction of Category Two Budgets in funding year 2015, demand had been



consistently over \$5 billion for several years. Even if you removed the requests for voice services for these years, the demand still topped \$4 billion each year.

The changes made to the E-rate program as part of the E-rate Modernization Order and the Second E-rate Modernization Order has been critical to schools and libraries, but again there is still work to do. Unutilized funds could be better used by applicants if there was an opportunity to do so. The changes that are part of the Proposed Rulemaking seem like a step in the wrong direction for our schools and libraries and for the goal of Universal Service.

I thank you for taking my concerns into consideration and ask that you do not move forward with the proposed rulemaking.

Respectfully Submitted,

Tonja Everest
Superintendent
Linn Benton Lincoln ESD