Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)
	)
Initial Comments of	)
Willamette Education Service District	)
	) WC Docket No. 13-184
Modernizing the E-rate Program for	)
Schools and Libraries	)
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	)
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Initial Comments of
Willamette Education Service District

I. INTRODUCTION

The Willamette Education Service District has been a part of the E-Rate program since it began in 1998. For the last ten (10) years, we have participated in the program as an applicant, regional district support, a consortium lead, and a consulting firm. These comments are applicable for each role the Willamette ESD serves. Currently, the Willamette ESD serves a region of twenty-one (21) school districts, a consortia of nine (9) entities, and twenty-six (26) consulting clients.

In detail below, we support many of the ideas in this Notice of Proposed Rulemaking released by the Commission with a few exceptions and suggestions.

II. CATEGORY 2 BUDGETS

We fully support permanently extending the category two budget approach. The current process has allowed districts more flexibility and time to make budgetary decisions regarding Category 2 purchases. In the last five funding years, our regional districts have been committed $7,663,637.33 in Category 2 funding. Our consulting clients have been committed a total of $7,705,962.29 in Category 2 funding. We strongly object to the option of bringing back the two-in-five rule. We often received feedback from districts that the complications of the two-in-five rule were too complex between the tracking and restricted option to purchase year to year. Many of those applicants are now regular participants with the Category 2 Budget process.

We also support an increase in the budget floor to $25,000. The current floor ($9,793.04 for funding year 2019) does not always allow smaller districts to build or expand their network. For example, a new school, a school district converting to a fiber connection in need of brand new equipment, or replacing a network entirely would be partially funded by E-Rate with the current floor, but the district cannot afford the remaining project costs. Some smaller districts have struggled to receive bids due to larger districts often being the first to receive bids because of the larger project costs.

We believe budgets should be created and spent district wide (eliminating cost allocation and entity budgets), allowing the applicant to make the best decisions based on the applicant's needs. Applicants should still be responsible for the location and tracking of all equipment. We also suggest budgets reflect actual student enrollment each year. The change in enrollment for a five year period could have a significant impact on a district and its

infrastructure. The majority of the time, the growth requires upgrades and/or new facilities to accommodate the higher enrollment numbers. This will also give the most accurate data in terms of enrollment at each district.

We strongly support the idea of a fixed budget cycle. Not only does this allow applicants to develop technology plans accordingly in five year increments, it also allows districts an opportunity to complete major projects with E-Rate funds. Planning for a large project across two budget cycles can significantly impact a district's budget and infrastructure, as well as the timeline of completion. We recommend beginning the first fixed year cycle in 2020, and each district and library will have a new budget. Any remaining budget from funding years 15-19 will not be spent. We strongly oppose a rolling budget, as those processes would likely create confusion between funding years. Many of our regional and client applicants rely on our services for training, tracking, deadlines and advising. A rolling budget would mean applicants will be on different cycles, which can be confusing not only for our applicants, but as well as the Client Service Bureau, USAC reviewers, and service providers. It will add additional steps to an already extensive process.
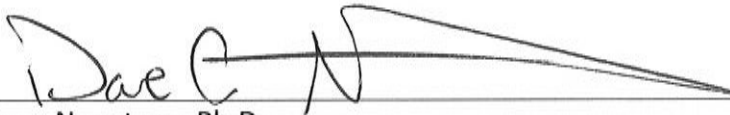
III. ELIGIBLE SERVICES

We encourage the FCC to consider a few suggestions in regards to the Category 2 eligible services. Because filtering is an E-Rate requirement in relation to CIPA compliance and is often bundled with firewall services, we are suggesting that filtering services be an eligible Category 2 service. A Network Management Card for an Uninterrupted Power Supply (UPSs) is required to make the UPS function properly. Some models require a separate purchase of the Network Management Card, and many applicants have asked us why this is ineligible. It would

be beneficial for both applicants and service providers, especially during the bidding process, if these cards were eligible. Another suggestion would be to include the option of "maintenance" for each internal connection. There are times the service provider includes the option, but if the applicant did not request maintenance on the Form 470, it is ineligible. All of these suggestions have impacted applicants in our region. With already limited technology budgets, including additional necessary product components could benefit applicants, and increase participation.

IV. CONCLUSION

We have seen significant improvements in relation to the Second Modernization Order. Our internal data, as well as USAC's data has shown these changes to be improving the overall success of the program. We believe with some continuing improvements, this program will continue to assist in supporting schools and libraries in our region and across the country.

Respectfully submitted,

7/29/19
Date

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