



## Arizona Department of Education

Office of the Associate Superintendent of Policy Development and Government Relations

July 29, 2019

The Honorable Ajit V. Pai  
Chairman  
Federal Communications Commission  
445 12th Street SW Washington, DC 20554

Dear Chairman Pai:

The Arizona Department of Education writes to request that the Federal Communications Commission (FCC) **discard any plans for setting an overall cap for the Universal Service Fund (USF) programs.** Such a proposal would harm classroom learning, rural health care, and broadband deployment by forcing local entities to compete in order to receive necessary funds. The USF programs have been key to moving Arizona and the country toward the goal of universal connectivity throughout America and placing an overall cap on the USF programs would threaten this necessary progress.

We would like to request continuation of the USAC Category 1 "Special Construction" initiative approved in the 2<sup>nd</sup> E-Rate Modernization Order. This single rule has enabled countless schools in rural America to close the digital divide.

The 2<sup>nd</sup> Order also implemented a program to provide Category 2 funding for ALL schools. This has enabled WIFI access for schools and provided supplements to ALL schools instead of just the 90% NSLP. It is our hope that you continue the program based on a 5-year rolling budget.

The four programs that comprise the USF have enjoyed bipartisan support for decades and reflect the underlying goals of communication policy in Arizona and the country at large.. The E-Rate program specifically ensures that all students from urban and rural neighborhoods can connect to the internet and be afforded the knowledge and opportunity that connectivity provides.

In today's economy, broadband access is a necessity, not a luxury, for educators and students, and their families. The Lifeline program embraces this principle by providing essential services to lower-income Americans. Additionally, the Rural Health Care program enables nurses and health professionals to have access to vital communication services that assist in providing health care in rural communities. Communication and broadband access is important for every person, which is why it is crucial that the Connect America Fund accelerate broadband infrastructure in needed areas, particularly rural communities. In Arizona, approximately 135 of

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Arizona's 223 school districts are considered rural by the Arizona Rural Schools Association. They serve about 35 percent of all students in the state.

Each program that is a part of USF plays an indispensable role in achieving the ultimate goal of USF, access to communication services for every American. The proposal to place a universal cap on these programs is a direct assault on the FCC's mission of bridging the digital divide. The proposal to place a sub-cap on the E-Rate and Rural Health Care funds is particularly troubling. None of the USF programs should be pitted against each other and forced to vie for a piece of the pie. Moreover, the FCC's request for comment on "prioritizing the funding among the four universal service programs" violates Congress's legislative intent in enacting the USF.

We believe that all four of these programs should be able to continue to operate and thrive independently without the constraint of a universal cap. Program recipients should also be able to rely on consistent funding for their program and not live in fear that their funding will be slashed to provide for the other equally deserving programs.

We strongly urge the Commission to abide by its statutory commitment to students, health care providers, librarians, and those in rural communities.

Sincerely,



Callie Kozlak

Associate Superintendent of Policy Development and Government Relations

CC:

Commissioner Michael O'Rielly

Commissioner Brendan Carr

Commissioner Jessica Rosenworcel

Commissioner Geoffrey Starks

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