



**DEER VALLEY**  
*Unified School District*

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July 25, 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.

E-Rate funding has been available to the Deer Valley Unified School District since the mid-90's. Prior to 2014 we obtained funding for reimbursement regarding costs associated with connecting schools to the internet or Wide-Area-Networking costs + internet connection costs. Virtually all districts were eligible for this and our reimbursement rate varied year to year but was generally between 55-60%. The category 2 funding was used to purchase data cable, network hardware and wireless hardware on each individual school site to our Title 1 campuses. After the program was re-worked by the FCC in 2014, the category one funding was reduced but category 2 funding equated to approximately \$150 per student and DVUSD has used that money to supplement the bond funding to upgrade the networks at all of our 38 schools.

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 is 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 is the rapid and significant expansion of connectivity in schools, and I am 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.

I am 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.

*Graduating lifelong learners who will successfully compete, lead, and positively impact the world.*

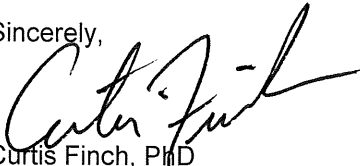
The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring 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.

It is important to note that if category 2 funding would be capped or eliminated, it would affect our entire network infrastructure and detrimental to our 38 campuses which include approximately 34,000 students. The costs reimbursed to our district is approximately \$300,000 per year. It is unfortunate that we do not receive any state-matching funding and rely solely on the E-rate federal funding for these expenses.

E-rate funding has enabled our district to upgrade and expand our technology resources in instruction as well as maintain filtering and internet safety. If the funding is not reauthorized going forward, we would need to reconsider future programs for our students as this would impact our budget.

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,

A handwritten signature in black ink, appearing to read "Curtis Finch", written over a horizontal line.

Curtis Finch, PhD  
Superintendent  
Deer Valley Unified School District