July 23, 2019

Federal Communications Commission

Re: Proposed E Rate Regulatory Revisions

Proceeding Nos. 06-122; 19-46

Dear Commissioners:

On behalf of the 321 rural school districts of New York State, I write to impress on you the far reaching, deleterious impact of the above captioned regulatory revision. No segment of our nation currently struggles as mightily as our rural communities. Lack of access to the internet is a significant barrier to both a quality education and a viable economy. The E Rate Program has served America well by supporting rural connectivity. However, much remains to be done if we are to support rural America in efforts to rebound from the massive loss of economic activity.

The Rural Schools Association of New York State is actively helping federal agencies, such as the U.S. Dept. of Labor and the U.S.D.A. to rebuild the rural workforce. Implementing a cap on E Rate and putting education in competition with the vast needs of rural health care would harm both efforts and run counter to the efforts of these other federal agencies.

Rural schools are known for their high graduation rates, but this masks a crisis resulting from the inability of these schools to produce competitive graduates (due to a dramatically narrowed curriculum stemming from fiscal distress.) The internet, much like the school bus in its day, allows rural students to overcome time and the lack of local resources in their attempt to receive an education that is competitive with urban and suburban counterparts. The choice is simple: Provide readily available and affordable broad band access to rural students or relegate them to poverty. This choice is in your hands.

Rural schools are creative, innovative and resourceful. Some have partnered with hospitals, emergency services, county agencies to create a level of internet access for their communities. Some have been forced to make school buses a wifi hotspot in order to provide access in remote areas. Others volunteer to stay after hours to keep schools open for students who have internet access only at school. E Rate works. The proposed changes eviscerate that good work by forcing often impoverished communities to choose between their sick and injured and their children. Other nations have successfully overcome fiscal obstacles to provide broadband access to all. We have not. America is better than that. Please don’t compound our inferior international position in this matter by further delaying the provision of broadband access throughout our country.

Please support America’s competitive international position by allowing a sound education for the millions of our nation’s rural students. This ability of millions of America’s future workers to become prepared for a fast paced and changing economy is a matter of the utmost national interest. Don’t believe that the U.S. can ignore this crisis without serious, permanent economic and social implications.

Given the vital nature of providing internet access to rural America, RSA, representing the 321 school districts and the hundreds of thousands of students in their care, earnestly and fervently requests your rejection of the above referenced regulatory changes.

Respectfully submitted,

David A. Little, Esq.

Executive Director