



VINTON-SHELLSBURG COMMUNITY SCHOOL DISTRICT

"Home of the Vikings/Vikettes"

Mary Jo Hainstock
Superintendent

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July 23, 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.

Our district serves about 1500 students and about 40% of them qualify for free or reduced meals. We are in rural Iowa which means the school is the main access point for education, connectivity, and preparing our students for their futures. We need to continue to provide a high level of support for not only our students but also for their teachers and other staff whose professional development is supported through the resources we are able to provide and access via E-Rate funded supports.

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 in 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. Our community has one of those rural hospitals and we work to support each other's missions; it would be unfortunate if changes to the E-Rate program would make us competitors.

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.

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.

Our district has used E-Rate funds to support technology across our district. Specifically, we have used it to purchase internet services, to upgrade our network across the district, to provide a firewall protecting both the district and students, to partially fund phone services, and to provide wireless access in all of our buildings. These services and equipment have allowed us to provide 1:1 computer access to students 6-12 and almost 1:1 for our K-5 students. Through this level of technology and connectivity, they have been able to access on-line resources and have expanded the “walls” of our classroom to the greater world. Many of our high school students are able to take on-line courses for college credit and credit recovery courses for high school credit. Through this program, our teachers and other staff have been able to connect with resources and experts across the region, the country and even the world.

Over the last four years, our district has used E-Rate funds in the following areas:

- Internet Connection – about \$12,000 per year to purchase network services

- Firewall – about \$30,000 to provide a firewall that protects confidential information and meets legal requirements

- Phone Services – about \$4500 a year to provide cell phones to staff who are seldom in their offices (although this is no longer an allowable expense)

- Wireless Upgrade – almost \$70,000 to provide more and better access points in 2016 and another \$46,000 in 2019.

We leverage local property tax dollars within our Physical Plant and Equipment Levy and state funds through the SAVE program to maximize the benefits of E-Rate. With or without E-Rate funds, we would have needed to do all of the projects. If we hadn't had E-Rate funds, we would have reduced expenditures from local funds that would have resulted in other purchases being delayed (such as new busses or other vehicles or replacing roofs and flooring) or even a reduction in personnel.

We have accessed and valued the E-Rate funds since they became available and especially appreciated when the paperwork burden of the application process was reduced a few years ago. We have also come to rely on E-Rate funds as an integral part of staying current and up-to-date in our technology infrastructure. If E-Rate dollars are competing against rural health care dollars, there would make budget planning and long-term planning uncertain.

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,



Mary Jo Hainstock
Superintendent