

EAST GRAND FORKS PUBLIC SCHOOLS  
EAST GRAND FORKS MINNESOTA, 56721

Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,   
Washington, DC 20554

July 23, 2019

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.

East Grand Forks is a Rural District with an increasing poverty rate. We have in the last 6 years experienced growth in a diverse immigrant population of 500%. The $250,000 each year is helping our students have access to innovative digital learning technologies such as online college learning opportunities, Dreambox math programming, language development with blended classroom learning opportunities, and credit recovery to name a few.

Administrators and teaching staff partake daily in state and regional meetings that take place online and staff development e-learning groups. And now our district is looking into E-Learning ideas for weather related cancelations. We also are on a journey developing personalized learning opportunities for all of our students, which will require strong connections for streaming video. E-rate dollars have proven to be the most successful allocation of dollars for students. Students have access to high-speed broadband and strong infrastructures of connectivity so that we can continue to provide equitable access to the global opportunities of learning in rural Minnesota.

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.

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.

Please do not create a situation where we are competing for scarce dollars. Pitting health care against education cannot happen. We are trying to bridge the digital equity divide and this will take us backwards. Our needs are increasing daily with the needs of our students. Watching technology rapidly morph over the 27 years in my career shows we don’t even know what is in store for us even five years from now.

Please do not shut down the superhighway of connectivity for our students by having us compete with rural health care for resources. We have so many needs, infrastructure for cyber security, Wifi on school buses, virtual reality, classrooms of tomorrow with robotic kits, leveraging Artificial Intelligence to develop customized student learning solutions, crowd sourced tutoring, micro-tutoring, tools for students with learning differences such Autism Spectrum Disorder to utilize visual images and computer graphics to capture and maintain their attention. Our needs are higher than ever.

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,

Suraya Driscoll

Suraya Driscoll

[sdriscoll@egf.k12.mn.us](mailto:sdriscoll@egf.k12.mn.us)

218-793-2901

East Grand Forks Public Schools

1420 4th Ave NW

East Grand Forks Minnesota