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

July 29, 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.

Accomack County Public Schools (ACPS) is located between the waters of the historic Chesapeake Bay and the Atlantic Ocean on the Eastern Shore of Virginia, we are a community rich in heritage, respecting life sustained by water and land (fishing, aquaculture and agriculture) while embracing the future (home to Virginia's Space Port).

We value learners, community, challenge, and growth. Our mission is to provide a safe, engaging, student-centered environment where all learners grow and are prepared for further education, citizenship, and work.

From the prolific waters of the Chesapeake Bay to the pristine shores of Virginia's Barrier Islands, we provide an excellent education in one of the most unique places in the world.

Accomack County Public Schools serve approximately 5,000 students in 11 schools. We have three island schools, including an elementary and middle/high school on Chincoteague Island, as well as the only K-12 combined school in Virginia, located on Tangier Island in the middle of the Chesapeake Bay. Our mainland schools include four elementary schools, two middle schools, and two comprehensive high schools, each with on-site career and technical centers (CTE).

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.

ACPS uses the E-Rate dollars to offset major computing, network, and security costs that directly impact all student and staff members instructional and business activities. Being a very small and rural school division, the E-Rate dollars allowed us to upgrade the entire network wired switching and wireless access platform in August of 2016, which ensures faster speeds for instructional learning and business operations. In addition, E-Rate dollars provided us with a funding source to upgrade core network security appliances ensuring student and staff safety when accessing the Internet along with protecting business data while interacting with web-based applications and systems.

E-Rate dollars have allowed (and will hopefully continue to allow) us to improve school safety by implementing networked based, with centralized management, security cameras with digital recorders and deploying a Voice Over Internet Protocol (VoIP) system with a division wide unified dial plan and a centralized Tele-center PA/Intercom system.

Finally ACPS depends on the E-Rate dollars to off-set the five year teacher computing refresh. We depend on the E-Rate dollars to fund the teacher computer refresh. Without the E-Rate dollars, our ability to refresh our teacher computing devices would not exist which will directly affect student learning in turn providing a disservice to the students and community of Accomack County.

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,

Jack Bowden, Coordinator  
Technology Services