



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

July 24, 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 many Arizona schools and districts to obtain affordable telecommunications and internet access.

Here is what one rural educator said about the impact of the e-rate program on her district. Marvy McNeese, the Principal at Prescott Lakes Parkway School commented, "Not only will the students and educators benefit from this new connectivity, but entire communities in these remote areas of Yavapai County will feel the positive impact as well. The learning opportunities for students are exciting. Their world just opened up." Yes, worlds open for rural students in poor communities! That is the definition of success.

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.

The Arizona School Administrators, representing some 200 school districts and 1,400 public school administrators from every county in Arizona, stand adamantly 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.

In Arizona this federal program has led to unprecedented collaboration among municipal, county, and state governmental entities, as the following example dramatically demonstrates. Yavapai County Educational Technology Consortium (YCETC) has completed the first county-wide Broadband Initiative in Arizona. This initiative has brought high speed internet to its members at a fraction of what the cost used to be. On average, the member schools and libraries are saving 87% in their annual internet costs. These schools and libraries are made up of both urban and rural entities, including the Jerome Library, the Crown King School and Library, the Congress School and Library, the Hillside School, the Bagdad Schools, and the Mayer Schools, for example. The Yavapai County Educational Technology Consortium is the largest educational technology related organization in the state of Arizona and has been serving its member schools and libraries since 2009. The consortium provides services to school districts, charter schools, libraries and college participants. This model helps secure redundant, secure and sustainable internet service at high speeds. This coordinated educational communication network provides a much-needed boost to service while reducing the costs to separate and distinct educational partners. Yavapai County School Superintendent Tim Carter, who facilitates meeting of the YCETC Board of Directors, says “The increased bandwidth has been a dream come true for many small, rural, and isolated schools and at the same time, providing a huge cost relief to all members.” This initiative is the result of a 2017 \$1.8 million grant from the Federal Communication Commission (FCC), the Governor’s Office and the State of Arizona. Now completed, the initiative has connected 76 Yavapai County Schools and Libraries to high speed internet. Additionally, six municipal sites were also added resulting in significant savings for them as well. YCETC Executive Director Stan Goligoski remarked, “The YCETC tackled this project with the mindset that broadband is a utility just like telephone, water, and sewer. By pulling our resources together, even our smallest schools and libraries become a powerful community anchor institution to finally bring high speed internet at a very low price to all communities throughout Yavapai County.”

In closing, I reiterate the Arizona School Administrators’ 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,



Mark Joraanstad, Ed. D.
Executive Director