

Vienna Public School

DISTRICT NO. 55

Greg Frehner, Superintendent

OFFICERS:

Sherie Smith, Pres.
Stephani Borders, Vice Pres.
Kim Johnson, Sec'y
Sheri Robinson, Treas.

P. O. BOX 427

Vienna, Illinois 62995

Phone 618-658-8286

DIRECTORS:

Teale Betts
David Clayton
Lucas Hook
Patrick Trovillion

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

July 26th, 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.

Vienna Public School District #55 is a rural PreK-8th grade school district located in Johnson County, Illinois. Without E-rate supports, Vienna District #55 cannot fund needed Category I and II projects that are instrumental in supporting high quality academic programming for our 400 plus students. As a hub of our rural community, the E-rate grant supports numerous extended day academic programs and community engagement. As of April of 2019, 63% of our K-8 students are eligible for free and/or reduced meals. Rural Southern Illinois school districts and communities continue to struggle financially – E-Rate is a means to help close the academic and economic gap for many of our students and their families.

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.

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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.

Federal E-Rate revenues have allowed our rural Southern Illinois school district to modernize the needed internet infrastructure to support 21st Century learning. We continue to count on future E-Rate revenues to provide equitable access to learning and assessment – access that is common for school districts with larger local share revenue capabilities. Again, with capped E-Rate Funding, our rural school students are essentially left behind and learning in an academic setting that is not equitable, nor adequate to meet and exceed 21st Century learning goals.

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,



Mr. Greg Frehner – Vienna District #55 Superintendent

www.viennagradeschool.com

618-658-8286

gfrehner@viennagradeschool.com