

July 30, 2019

Chairman Ajit Pai

Federal Communications Commission

445 12<sup>th</sup> Street SW

Washington, DC 20554

The Iowa Association of School Boards (IASB) represents over 1,900 school board members from nearly every school district in the state. On their behalf, we offer our comments, concerns and opposition with the proposed rules put forward by the Federal Communications Commission (FCC) that would place a cap on the Universal Service Fund (USF) which would negatively impact E-Rate and high-speed broadband access to schools and libraries.

There are four programs that make up the Universal Service Fund, administered by the Universal Service Administrative Company under the direction of the FCC. The four programs under USF are: Connect America Fund for rural areas, Lifeline for low-income consumers, E-rate for schools and libraries, and Rural Health Care. These four programs provide critical services for school districts and putting in place a cap on these funds would be detrimental to schools.

The E-Rate program is crucial to aiding schools and libraries to connect to high-speed broadband. A report by the Consortium for School Networking found that broadband for schools has continued to improve thanks to E-Rate modernization and expansion. A priority of the Iowa General Assembly has been to provide internet connectivity in rural Iowa. For some students, the only time they have access to the internet is during the school day. Placing caps on such an important education tool could potentially stifle access for students to learn and complete assignments. The FCC should continue looking at ways to expand E-Rate and other opportunities for students to connect to high-speed broadband outside of the classroom.

Another issue facing Iowa school districts is healthcare. The FCC proposal would merge spending caps for E-Rate and Rural Health Care programs into a single cap. This could potentially lead to one program using another program's funds and undermines the intent of Congress and threatens these programs. Rural districts in Iowa are already making difficult decisions when it comes to health care and squeezing funds could have a dramatic negative outcome.

School board members work to ensure they develop sound financial budgets to meet the needs of students and teachers. The IASB leads on ensuring timely and equitable funding so boards can make thorough fiscal decisions. If the proposed cap is enacted, the four programs will face uncertain funding levels which will make it difficult for boards to plan. Currently, Iowa school boards receive over \$10 million dollars from E-Rate. Placing uncertainty on E-Rate funds makes it difficult for Iowa school boards to effectively plan their budgets.

The IASB appreciates the opportunity to provide comments on this important matter and it is our hope the FCC takes a strong stance to expand the E-Rate program. The IASB urges the FCC to follow the lead

of the U.S. House of Representatives when they unanimously passed House Amendment 483 to H.R. 3351, the FY 2020 Financial Services and General Government Appropriations Act which prohibits the FCC from implementing this rule.

Respectfully submitted,

Phil Jeneary

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Iowa Association of School Boards