



Superintendent
Heidi Sipe

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Toby Cranston, Veronica Gutierrez, Steve Potts, Melisa Webb

July 26th, 2019- VIA ECFS

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

RE: Notice of Proposed Rulemaking (NPRM) in WC Docket No. 06-122

Dear Chairman Pai,

Thank you for the continued support of E-Rate, this program has allowed greater access to students for our rural school district and I am thankful for the work done by the FCC to support the E-Rate opportunity. I am writing to you regarding WC Docket No. 06-122. Specifically, I have concerns with the components of the docket which considers changes to the Universal Service Fund (USF) programs, including E-Rate.

The Umatilla School District (BEN:145149) serves a high-poverty, diverse, student population in rural Eastern Oregon. We serve the second highest percentage of English Language Learners in the state. We also serve a highly mobile population, with a student population that fluctuated between 1330 and 1382 students in the 2018-19 school year. Our School District NSLP Percent is 80.1% and our Category One Discount Rate is 90% and our Category Two Discount Rates is 85 %. Recently, our funding commitment for Category One funding was \$18,306 and Category Two funding was in excess of \$3,203 for switching, routing and access points for our schools. Since the E-rate Modernization Order was adopted, Umatilla School District has utilized over \$188,000 in Category Two funding. This savings allows us to allocate funds for instructional staff. Without E-rate reimbursement at 90%, we would need to spend over \$18,000, or the equivalent of a paraprofessional, to maintain our connectivity to the internet to access curriculum.

We believe the current E-Rate program is a success and ask that such success be allowed to continue. The proposed rule adds a funding cap for the USF program and combines E-Rate under a funding cap with Rural Health Care. I am concerned about this pairing. We do not want to put schools and health care in the same pool, competing for the same funding. This does not improve programs, and instead could potentially limit access to health care and education which are both vital services, especially in rural areas. E-Rate, in its current program administration, is effective and has helped our district improve access for students. The system has measures for financial accountability and responsibility and the CAT 2 budget process is well aligned to our sustainable technology acquisition processes.

E-Rate has brought much to the students of Umatilla- through E-Rate, we've been able to add fiber and upgrade bandwidth to meet student, classroom and staff needs. With this access, we can offer online

learning opportunities, enhanced curriculum and online resources for students. We've also been able to add managed wireless access for over 1600 devices- the majority of which are for student use. Umatilla School District has also upgraded network components to provide connectivity to over 2,000 devices. E-Rate has been well utilized, well managed and fiscally responsible. Please forgo establishing new caps and refrain from merging the existing program-level caps for E-rate and Rural Health Care programs as proposed.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, reading "Heidi A. Sipe". The signature is written in a cursive, flowing style.

Heidi A. Sipe
Superintendent