Dr. Patrick Charlton, Superintendent

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Regarding WC Docket No. 13-184
Please see our responses below in bold:

1. FCC proposes to keep the current $150/student (adjusted for inflation) budget multiplier.
    1. Should the minimum budgets for small schools and libraries be increased to $25,000? (¶ 20)
    2. Should the rural library budget multiplier be increased (perhaps to match the urban library $5.00/sq. ft. multiplier)? If so, submit specific data and examples to support the need. (¶ 21)

We don't feel that this question is applicable to our district. The set budget per student has been sufficient for our needs.

2. Should budgets be administered on a districtwide basis? Would libraries benefit from a system-wide budget? (¶ 24)
    1. If district-wide budgets are adopted should the equipment transfer rules within a district be eased? (¶ 27)

Having budgets administered on a districtwide basis and having the equipment transfer rules eased would have a great impact on our effective use of category two budgets. Our district is currently experiencing unprecedented growth which has resulted in the construction of new schools and the purchase of portable classrooms across the district. When we build a new school, a percentage of the construction budget is used to establish the building with network infrastructure. The category two funds then allotted to that new, often larger, school would be more effectively used for our older schools with a smaller student population whose infrastructure needs to be updated. Additionally, as we move portable classrooms to where they are most needed, having the strict equipment transfer rules in place results in excess labor for our staff to remove equipment from the portable prior to its move to the new school, rather than being able to keep the equipment that has already been installed where it is and allow it to continue serving students at a new location.

3. Should the student count and square footage in the first year of a five-year cycle be used for all five years to ease administration of the budgets?
    1. Or are there significant advantages to having the budgets rise (or fall) depending on student population or square footage each year? (¶28)
    2. Should a presumption be established that the student counts verified in one of the last four funding years are still accurate for the purposes of setting a category two budget, absent an effort by the applicant to increase the student count? (¶ 28)

As our district is currently experiencing a 3% average annual growth, it is advantageous for our category two budgets to increase with our student count each year. If budgets were set in year one of the cycle and did not change until the next five-year cycle we would find ourselves needing to meet the needs of a drastically increased student population utilizing the budget based off of a smaller count.

4. Should 5-year budgets be allocated on a "rolling" basis or should there be fixed, 5-year periods for everyone (e.g., FY 2020-2024, FY 2025-2029, etc.)? What are the costs and benefits of either proposal? (¶ 32)

   For clarity of communication within our district and up to the state and federal levels, our team feels that it would be simple and clean to have everyone on set 5-year periods. Especially starting in year 2020, so that each new period would start 2020, 2025, 2030, etc.

5. Should all C2 budgets be reset as of FY 2020? (¶ 35)

   Yes, they should be reset in order to begin the new 5-year period.

6. What are the best ways to transition from the existing C2 budget rules following the five-year test period, to the new rules?
   1. Should the current rules be extended for one year, without modification, so that FY 2020 will be used as a bridge to transition to the final rules? (¶ 36)
   2. What are the best ways to reduce applicant confusion and provide for simplified administration of the C2 budgets as we move beyond funding year 2019?

   The best way to reduce applicant confusion during this transition to the new rules would be through clear, consistent, proactive communication. Our team would rather have the new rules established immediately rather than using FY 2020 as a transition year. It would be more confusing to have different districts at different stages of transition rather than everyone just adhering to the same set of rules.

7. Are there any additional services that should be eligible for category two funding or any other issues regarding category two eligible services that the FCC should consider? (¶18)

   The only services that we would ask to be considered for eligibility for category two funding would be content filtering equipment. In order to be eligible for e-Rate funding, we are required to have content filtering equipment and service in place, but it is currently a 100% district cost.