



Mesa Public Schools

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August 7, 2019

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

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.

Mesa Public Schools is the largest school district in Arizona with 65,000 students and 10,000 employees. We have witnessed the largest increase in poverty than any other city in the nation with 81,000 community members living in poverty. Breaking this cycle of poverty is necessary so that our students graduate ready for community, college, and career. We depend on the E-Rate program to support our students learning through connectivity to the community, state, nation, and global economies. E-Rate provided funding for upgrading data center and school network equipment as well as provide funding to install single mode fiber at our high schools and junior high schools. Mesa Public also is home to the Mesa Distance Learning Program, which services not only students in Mesa, but thousands of students across the nation. While, our state made matching funds available, our district was not approved for state matching funds because of limited state funds and those funds mostly dedicated to rural districts. Because Mesa Public Schools is the largest school district with one of the largest networks in the state, the requested state matching funding request would have taken a large percentage of the available state matching fund.

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).

Without E-Rate, the district would not have had the resources to install single mode fiber at the high schools and junior highs which provides bandwidth greater than 1gbps to wiring closets. The district has an E-Rate application (funding request) pending that would provide bandwidth to schools ten times greater than the current bandwidth speed at one-third of the yearly cost. Without E-Rate funding, this project will not be implemented and will not save E-Rate and the district money. Also, building out the network without E-Rate funding would not be possible for the district as the district would not be able to fund the entire network build out.

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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 in 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. 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.

Although E-rate funding is never guaranteed, the modernization of E-rate program allowed MPS to appropriately plan and implement a long-term network refresh. Due to the size of the district, projects can take a year or longer to complete a project and can be very expensive. The modernization program allows for the team to carefully plan and build out the network in phases. Building out the network in phases also allows for planning out the budget, especially when district funds are limited.

With funding uncertainty, planning connectivity and network build out would make projecting long-term needs and strategic planning very difficult. Prior to the E-Rate modernization program, E-Rate funds only were able to fund one-third of the eighty-three school sites because the remaining two-third schools fell below the eighty percent free and reduced lunch qualifications.

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,



Ember Conley, Ed.D.
Superintendent
Mesa Public Schools