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**Sandra Lyon***,* **Ed.D.**, *Superintendent of Schools* **Board of Education** | Richard R. Clapp, *President* John Gerardi, *Clerk* | Karen Cornett, *Member* Madonna Gerrell, *Member* | Timothy S. Wood, *Member*

August 14, 2019

To Whom It May Concern,

I am writing to respond to the recent release of the Federal Communication Commission’s Notice of Proposed Rulemaking related to the school and libraries program.

The capping of the USF creates needless competition and arbitrary decision-making about who receives the funding. The uncertainty for a district like ours in year-to-year funding, results in the inability to have any sense of legitimate long-range planning. This undermines the intent of making sure our schools are equitably funded and prepared to meet the technological demands of the current educational and workforce environment. We believe funding should be allocated once every five years, allowing the districts to decide when to use it in the five-year period. New funds, based on the allocation would become available in years 1, 6 and 11, for example, which would allow districts to better plan for upgrades. Ultimately, we would like to see this funding as a permanent allocation. With a fixed, stable budget, we would know how much we can spend and be able to adjust strategically over time, rather than reacting to a budget that changes each year.

Another enormous concern is that the budget is simply inadequate. In our school district, we had planned for 22 sites for cabling and network electronics upgrades but had to choose which was more important to the district, due to district budget constraints. E-rate dollars covered only approximately 45% of our pre-discount total cost, which is nearly double the $150 per student allocated budget. In order to adequately serve students in our country, the allocation must be doubled at the very least.

As we work to prepare our students for the current and future work environments, it is imperative that districts like ours have the technological infrastructure to do it. The current proposal is not enough to meet the needs of school districts like ours across the country. This is truly a funding allocation that has serious and long-range implications. We hope the FCC will reconsider its current proposal in the interests of students and their futures.

Sincerely,

Sandra Lyon, Ed.D.

Superintendent of Schools