



July 17, 2019

Honorable Ajit Pai Chairman

Federal Communications Commission
445 12th Street, S.W.

Washington, D.C. 20554

Honorable Michael O'Reilly Commissioner

Federal Communications Commission
445 12th Street, S.W.

Washington, D.C. 20554

Honorable Brendan Carr Commissioner

Federal Communications Commission
445 12th Street, S.W.

Washington, D.C. 20554

Honorable Jessica Rosenworcel
Commissioner

Federal Communications Commission
445 12th Street, S.W.

Washington, D.C. 20554

Honorable Geoffrey Starks Commissioner

Federal Communications Commission
445 12th Street, S.W.

Washington, D.C. 20554

Dear Chairman Pai, Commissioner O'Reilly, Commissioner Carr, Commissioner Rosenworcel and Commissioner Starks,

The Arkansas Society for Technology in Education is the ISTE affiliate organization for Arkansas that is comprised of a growing and vibrant network of +250 professionals throughout the state. We work together to integrate the impact of our educational communities, provide leadership and professional learning opportunities for our members, and advocate on behalf of educators.

We are an autonomous organization and supported by ISTE's purposes and priorities. We are aligned with the ISTE Standards as a framework for students, educators, administrators, coaches and computer science educators, promoting the opportunity to rethink education and create innovative learning environments. The standards are helping educators and education leaders worldwide re-engineer schools and classrooms

for digital age learning, no matter where they are on the journey to effective edtech integration.

Annually, we host a conference where we share the newest changes and best practices in education technology with our members, who then return to their home schools as teacher-leaders, and professional development liaisons. Our network of professionals are leading the state in effective technology integration in all schools and districts - rural and urban - as well as having a presence K-12 through higher education. As our membership grows, the impact ARKSTE has is invaluable as an affiliate advocacy organization, and is a leader of unifying educators in our state with the rest of the nation.

As a nation, 4.7 million more students have high-speed internet access than they did in 2013. Arkansas has done its part and connected 100% of it's students; with 98% of school districts in the state having connections capable of delivering 1MBPS. Financially, the cost of broadband in Arkansas has decreased by 86% since 2015, this is 14% more than the national average. Most importantly, schools in Arkansas have utilized \$30 million in federal E-RATE Wi-Fi funding, connecting over 700 schools. To fully experience the benefits of digital learning, students need access to sufficient bandwidth, scalable broadband infrastructure, and robust Wi-Fi. Arkansas students, courtesy of their connectivity, are making a big impact.

Enabling digital learning and effective technology integration in every classroom, every day requires more bandwidth. Current Arkansas Governor Asa Hutchinson is on record of saying: "In Arkansas, our students are developing 21-st century skills in the classroom to succeed in tomorrow's workforce. This requires high-speed Internet access in every school - which is why we upgraded the Arkansas Public School Computer Network. We must continue to meet school broadband demands as our teachers and students adopt more and more classroom technology. The fast-paced learning environment must not be slowed by insufficient broadband." Our state believes in instructional technology, accessible broadband connectivity is essential to all of our schools success.

Source: STATE CONNECTIVITY SNAPSHOT 2018 (AUGUST)

As an advocacy organization for instructional technology, the Arkansas Society for Technology in Education is very concerned with the FCC's proposals of Instituting an overall funding cap for the universal service cap and Instituting a subcap that combines E-Rate and the Rural Health Care program, and the effect it will have on our schools.

Instituting an overall funding cap will do the following:

- All four universal service programs serve important goals and populations – schools/libraries, rural communities and low-income consumers. There is no fair

way to prioritize funding among these programs and the groups that they serve in the event that an overall universal service cap is exceeded by demand.

- It would be unfair to penalize school and library E-Rate beneficiaries, who already operate under an annual cap, by cutting into their available funding if demand for another universal service program causes the overall cap to be breached and funds to be prioritized.
- It would create great uncertainty and potentially suppress participation because all universal service program beneficiaries will not know in advance when an overall cap will be reached and funds prioritized. Further, because of this uncertainty, schools and libraries that operate on annual budgets will be unable to effectively plan broadband/Wi-Fi projects and/or reserve the undiscounted portions of their E-Rate eligible services.

Instituting a subcap that combines E-Rate and the Rural Health Care programs will do the following:

- Given existing demand trends, the Rural Health Care program will begin consuming unused E-Rate funds almost immediately. This establishes a dangerous precedent and could lead to a permanent shift of E-Rate funds away from schools and libraries and to Rural Health Care beneficiaries.
- If Shrinking of E-Rate's cap actually occurs, this will constrain E-Rate funding and make it much harder to institute important changes to the E-Rate, including adding to the Category 2 formula (if deemed necessary) and adding new services (such as cybersecurity software). The direct impact on learning will be felt by minority and poverty students first. Districts with high poverty and minority populations have the largest benefits from the E-rate program. Many of these districts are dependent upon the E-rate funding to afford the network equipment, including switches and wireless access points.
- It would create more confusion (and possibly suppress demand) for E-Rate beneficiaries who are still becoming used to major changes to the program that began in 2015 – including a new Category 2 formula, new Category 1 rules around connecting to broadband, and the elimination of key eligible services such as voice.

We respectfully conclude this filing by requesting that the commission not institute an overall universal service cap or combine E-Rate and Rural Health care under a single subcap. The effect it will have on Arkansas schools would be detrimental to accessible broadband connectivity that is essential to the success of all of our schools.

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