

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:

Modernizing the E-Rate Program for Schools and Libraries
WC Docket No. 13-184

Comments of E-Rate Advantage

E-Rate Advantage is a full-service E-Rate management company, supporting over 400 schools and libraries throughout the country. We respectfully submit comments on the Commission's Notice of Proposed Rulemaking (NPRM) published on July 17, 2019 (WC Docket No. 13-184).

Implementing a Permanent, Five-Year Category 2 Budget:

E-Rate Advantage fully supports implementing a permanent five-year Category 2 budget.

Start the New Budget in FY 2020:

E-Rate Advantage fully supports starting the new budget in FY 2020. The E-Rate program is vital to schools and libraries and having the consistency and reliability of funding will help them plan their spending and allow them to focus on what is truly important to them, educating students and serving their constituents.

Implement the 5-Year Budget as a Series of 5-Year Blocks:

E-Rate Advantage fully supports the Commission implementing the 5-year budget as a series of 5-year blocks, and not allow them to rollover.

Increase the Per Student Budget to \$250:

E-Rate Advantage is not in support of keeping the Category 2 budget multiplier at \$150 but is in support of raising the per student multiplier to \$250. E-Rate Advantage believes that this \$250 per student more accurately represents an applicant's true need.

Equalize Urban and Rural Library Budgets at \$5.32 Per Square Foot

E-Rate Advantage fully supports increasing rural library Category 2 budgets to \$5.32 per square foot as we believe the cost of building in both urban and rural libraries are the same.

Increase the Minimum Building Budget to \$30,000 per Building:

E-Rate Advantage fully supports increasing the minimum building budget from \$9,200 to \$30,000 per building. E-Rate Advantage believes this will provide smaller entities with a chance to be adequately equipped with the proper technology they need to support their goals. E-Rate Advantage also believe this will drive more participation in the program if some of the smaller entities decided it was not beneficial for them to apply for only \$9,200 in the past.

System wide Budgets Instead of Per Building Budgets:

E-Rate Advantage fully supports a Per System budget instead of a Per Building budget. This type of budget system will dramatically reduce the administrative burden on all applicants. E-Rate Advantage thinks that moving to a System Wide budget will simplify the application process, simplify the review process, allow applicants greater control over their technology spend, and improve allocation of resources. It will ease the sharing of resources, it should eliminate the equipment transfer rules, and it should allow for greater flexibility for applicants to move equipment freely to those sites that need it most.

Treatment of Charter Schools, that are subject to district administration:

While there may be potential benefits of going to a district-wide Category 2 budget, E-Rate Advantage would like to express its concern on how this could potentially impact charter schools that are currently considered independent from school districts. We have heard from many of our clients that the relationships between the charter schools and their sponsoring districts can be contentious and political. If the district-wide Category 2 budget is implemented, we are concerned that some school districts would seek to claim independent charter schools as part of their district in order to gain access to the charter schools' E-Rate budgets in order to exhibit influence over the charter schools. The result would be that traditionally independent charter schools would be in a position in which the schools' E-Rate needs would be subject to the approval of the school district, which could decide either to allocate E-rate dollars to the charter school(s) or shift their budgets towards other schools within the school district, ie public schools. This could be detrimental to a charter school from an E-rate perspective and could operationally hinder them from being able to use their Category 2 funds. If the FCC chooses to go to a district-wide Category 2 budget, we would recommend that they continue to ensure that charter schools that are administratively and operationally independent from their sponsoring district continue to be considered independent schools for E-Rate purposes and that they continue to have their own Category 2 budgets.

Category 2 Budgets and Non-Instructional Facilities (NIF):

E-Rate Advantage fully supports applicants being allowed to spend their Category 2 budgets in NIF's.



106 Lilac Drive
Annandale, NJ 08801
Phone: 908.892.0705
Fax: 888.527.5449

One-time Collection of Discount and Budget Information, Per Five-Year Budget Cycle:

E-Rate Advantage fully supports allowing USAC to collect discount and budget information from applicants in the first year of the five-year budget cycle. These figures would then be used for the remainder of the five-year budget block. However, we suggest that the FCC allow applicants to update these numbers during that five-year block, should their populations change. If applicants do not update their numbers, the original numbers would persist for the entire five-year period.

Extending the Eligibility of BMIC, MIBS and Caching, while allowing for Advanced Firewall Features to be Eligible:

E-Rate Advantage fully supports extending the eligibility of BMIC, MIBS and Caching. We also support allowing advanced firewall features to be added to the Eligible Services List (ESL).

Summary:

E-Rate Advantage supports the Commission's proposal to make the Category 2 budget approach permanent, thereby, providing the nation's schools and libraries with reliable and predictable funding to meet their goals. We are thankful for this opportunity to submit our comments and appreciate the Commission's considerations.

Sincerely,

Ben Sniecinski
President, E-Rate Advantage
www.erateadvantage.com
Ben@erateadvantage.com
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