Comments for Notice of Proposed Rulemaking

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

August 16, 2019

First, we support how the Category 2 budgets have been implemented in the last five years and feel with a few additional steps, the process will work even better. We agree that there has been a much broader distribution of funding and this process has been more equitable and more predictable for our districts. And we totally agree that the program should not revert back to the two-in-five year program.

B. 18. Eligible Services. We support managed internal broadband services, caching and basic maintenance to remain eligible Category 2 services.

B. 19. Budget Levels. The amount per student is currently at $159.67 (rounded) and this seems sufficient. However, one report we saw stated their research and analysis shows the average should be $256 per student. Before setting the base amount, the FCC should conduct a full analysis if the cost should be closer to $159 per student or $256 per student.

B. 22. District-wide Budget. We whole-heartedly support a district-wide budget, rather than a budget per school site. There are many districts who need additional equipment at various sites when their end-of-life equipment is approaching but a particular school may not have any Category 2 budget left while other schools have remaining budgets but don’t need equipment at that time. Also, when the district needs to install equipment at the district office or NOC, it will be less of an administrative burden to calculate shared expenses and will be less expensive if there is a district-wide budget. Currently, when some of the sites cannot contribute because they are over budget, the district must pay those schools’ portions out-of-pocket and the total amount owed is divided up by just the schools who have budget.

We also feel that some of the administrative tasks would be reduced with a district-wide budget. It would tremendously streamline the process during the 470 and 471 application process, the PIA reviews and the Form 500 adjustments if it is a district-wide budget.

We represent 50 districts throughout California and Arizona and of the ones we’ve spoken to, they are all in agreement that it should be a district-wide budget.

B. 27. Equipment Transfer. Yes, the rules regarding restrictions of equipment transfers between schools should be reduced or eliminated, which reduces administrative record-keeping.

B. 28 Budget Calculations. The Category 2 budget would be easier to manage if the enrollment figures were set the first year of the 5-year cycle. This would immensely reduce the time-intensive hours we spend every year during PIA, validating entity eligibility, enrollments and free and reduced student counts. This is one of the most common questions we receive during PIA and it is more difficult every year to prove these numbers and eligibility when PIA changes the rules of what they will and won’t accept. We would like to validate those numbers once in five years.

B. 29. Codify Rounding Inflation Calculation. Yes, two decimals are plenty and less confusing.

B. 30. Application and Administration. We have not felt a large burden on how we apply for Category 2 services on our 470 and 471. However, if the budget was changed to district-wide, there would be many less FRN’s, PIA questions and re-calculating of the budgets; these steps would significantly reduce man hours. The Form 500 process needs to be upgraded. We feel the process for reimbursing the Category 2 funds when a school doesn’t use all their funding is much too labor intensive. Filing the Form 500 is not user-friendly in the EPC system and the process is much too time-consuming to complete when reducing funding, reviewing and reducing each line item. Upgrading the Form 500 is a major change that needs to be made.

C. Transition to Permanent Extension of Category Two Budget Approach

C. 31. Five-year Budget Cycle Transition. We like the idea of a set student count at the beginning of the five-year cycle. If a school requested Category 2 funding in 2015, they are done and should start a new cycle in 2020 with a set budget, based on their enrollment figures for 2020. Even for those schools that did not request funding until 2016 or later, it seems less administratively burdensome to start everyone over with a new 5-year budget in 2020, based on their new enrollment numbers.

C. 32. We do not support this plan of using the rolling budget and reducing the schools Category 2 budgets by what was spent in 2016-2019. This is an administrative nightmare where there are different plans for districts. All along, we have been estimating the budget amount that the schools had left was based on what they spent in 2015, not 2016-19. We have more calculations with which to contend if some districts are working from the old plans and rules and some are working with the new plans. Nightmare.

C. 33. Yes, we like this alternative option so that all applicants are on a fixed five-year cycle starting in 2020-2024 and have a new fixed five-year budget every five years.

C. 34. We do not support the rolling budget option of having only a certain amount of their budget a district can spend and an additional 20%+/- added every year. Again, administrative nightmare. Schools may have a large cabling or switch/router refresh plan and should be able to use all the funding in one year, if necessary.

C. 35. Again, we believe starting fresh in funding year 2020 and resetting all applicant budgets is the best course of action. This allows applicants a new opportunity to track their budgets and it eases the administrative portion of the process.

C. 36. We support starting fresh for everyone with their new 5-year district-wide budget in 2020. No, do not extend the rules for one more year. Too many variables if some schools can access funds into their 6th year and then can add additional funding; way too complicated. Absolutely, do not allow a second later filing window. Absolutely not. It is difficult enough now to get schools to file within the window and extending Category 2 filing longer will encourage confusion and prolong the agony of two deadlines.

We hope you find these comments useful. Please don’t hesitate to reach out for more information. Thank you.

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