

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

In the Matter of:

Modernizing the E-Rate Program for  
Schools and Libraries

WC Docket No. 13-184

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**Comments of Montgomery County Public Schools  
on Notice of Proposed Rulemaking**

Montgomery County Public Schools (MCPS) respectfully submits the following comments on the Notice of Proposed Rulemaking for the Modernization of the E-rate Program for Schools and Libraries (NPRM). MCPS is the largest school system in Maryland and the 14<sup>th</sup> largest school system in the United States. MCPS serves over 162,680 students, and the E-rate Program plays a large role in MCPS' ability to provide Internet service to its 206 schools. MCPS has prepared its comments based on the paragraph numbers found in the NPRM and has referenced the applicable paragraph numbers in its comments below.

18. *Eligible Services.* MCPS requests that the Federal Trade Commission (FCC) consider including the entirety of school districts' core firewalls, redundancy and back-up technologies, and VoIP technologies as eligible services. Although core firewalls are currently included as an eligible service, the complexity of calculating the per school budget and cost allocation of services to instructional facilities separate from non-instructional facilities render applying for reimbursement of this critical service overly burdensome. Core firewalls and their components wholly contribute to providing a safe and secure environment for students in the use of broadband services. For these reasons, MCPS requests that the FCC consider an approach that provides school districts the ability to apply for E-rate funding for core firewalls in their entirety. MCPS also requests that the FCC consider including redundancy and back-up technologies as eligible services under the E-rate Program. With the rapid expansion of online learning through digital curricular platforms, as well as the transition to online testing for government mandated testing, redundancy and back-up technologies are essential to school districts' disaster recovery capabilities. These technologies directly contribute to school districts' ability to minimize the loss of valuable instructional time and the delivery of time-critical assessments to students. Lastly, MCPS respectfully requests that the FCC consider including Voice over IP (VoIP) as an eligible service under the E-rate Program. VoIP has provided schools with a cost-effective delivery alternative to analog telecommunication services. Including VoIP as an eligible service recognizes the use of this service as an industry-standard method of delivering telecommunication services to schools.

22. *District-Wide or Library System-Wide Budget Calculations.* MCPS agrees with previous comments from stakeholders regarding the administrative difficulties associated with managing per-entity budgets. A district-wide budget would provide MCPS with flexibility to serve all of its schools including schools that

are part of MCPS' equity initiative and schools experiencing large renovations that require significant investment in broadband technology.

27. *Ease of Equipment Transfer Rules.* MCPS favors the easing of the equipment transfer rules. The ability to transfer equipment among schools creates flexibility to provide greater support to schools participating in equity initiatives and other programs that serve MCPS' most impacted schools. For auditing purposes, MCPS would still be able to certify equipment locations and demonstrate that the equipment is used for educational purposes.

28. *Budget Calculations.* MCPS favors a fixed five-year budget and supports adjustments to enrollment each year with an appropriate cost of living increase applied to the per student budget calculation. MCPS continues to be a rapidly growing school district, and an annual adjustment to the enrollment count would provide needed funds to serve its growing population.

In conclusion, MCPS appreciates the opportunity to comment on the NPRM.

Respectfully submitted,

/s/ Pete Cevenini

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