

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

In the matter of )  
Modernizing the E-rate Program for ) WC Docket No. 13-184  
Schools and Libraries )

Comments regarding  
Notice of Proposed Rulemaking  
Category 2 Budgets

INTRODUCTION

The Modesto City Schools (MCS) serves thirty-eight schools in urbanized central California. Our agency relies heavily on the E-rate program to support our schools and students by providing high speed Internet access, a vital component of educating students in the digital age.

We appreciate the Federal Communications Commission (FCC) for being reflective, and working to continually improve the E-rate program and to simplify and streamline the program when possible. We also appreciate the opportunity to provide feedback on category two budgetary approach and process outlined in the NPRM.

Our comments are brief and are labeled based on the paragraph number of the Notice of Proposed Rulemaking (NPRM).

COMMENTS

Paragraphs 14 – 16: **Category two budget approach.** MCS strongly supports the permanent extension of the category two budget approach. Our schools have benefitted tremendously by being able to rely on the funding. This has allowed us to plan on system upgrades, knowing the funding will be available.

Paragraphs 19 – 21: **Budget levels.** Although we are thankful for the new category two budget approach, we have found that the \$150/student factor is far too limited to satisfy the needs of each school. A more realistic per student budget is at least \$300 per student.

The MCS also supports raising the funding floor to \$25,000 since this will provide more equitable funding for the small schools. The current floor of \$9,200 is an insufficient

incentive for these schools to invest in a wireless local area network when so much additional funding must come out of pocket.

Paragraphs 22 – 27: **Agency-wide budget calculations.** The MCS supports moving to an agency wide budget. The current site restricted budgets do not align with agency needs and it creates an unnecessary challenge to administer and leads to wasted funds since we are not able to utilize all of them for their intended purpose. It also enables technology departments to ensure equity of access and priority E-rate funding by site based upon their specific needs. This will result in a more cost effective approach in procurement, purchasing and implementation.

We agree that making the budget agency-wide will simplify the administrative burden. The relief on the FCC Form 471 alone will be significant, not to mention the FCC Form 500 and other related processes.

Paragraph 28 - 29: **Budget calculations.** The MCS prefers to have an annual adjustment to the budget. However, we would like to suggest a possible improvement. The FCC could establish the first year of the five-year cycle as the “base year”, where all agencies go through the process of validating the entities, enrollment and number of students eligible for the National School Lunch Program (NSLP). It would be assumed that the resulting category two budget and discount percent would carry forward for the next five years. However, it would be ideal if an agency had an option in EPC, perhaps on the FCC Form 471, to request a “refresh” of the base year’s data. The “refresh” would presumably result in a new round of validation. If validated, the “refreshed” data would finish the balance of the five-year cycle.

We thank you for taking the time to include our comments in your review.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Russ Selken", written in a cursive style.

Russ Selken  
Chief Technology Officer  
Modesto City Schools