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

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|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Modernizing the E-Rate Program for | ) | WC Docket No. 13-184 |
| Schools and Libraries | ) | |

**COMMENTS OF KELLOGG & SOVEREIGN® CONSULTING, LLC**

Kellogg & Sovereign® Consulting, LLC (KSLLC) submits these Comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) published on July 17, 2019 (WC Docket No. 13-184) regarding making permanent the category two budget approach adopted by the Commission in 2014 to fund internal connections.

KSLLC is an E-Rate consulting firm that has managed E-Rate applications for schools and libraries since the inception of the program. At present, KSLLC assists over 315 E-Rate applicants in thirteen states. These applicants range in size from a total of 41 students to applicants with 60,000+ students.  The diverse client base provides KSLLC with the ability to see a wide range of schools and libraries and gives them a unique understanding of their various needs from a broad perspective.

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**KSLLC submits comments as follows:**

### A. Support of Comments submitted by E-Rate Management Professionals Association (E-mpa).

KSLLC fully supports the comments submitted by E-mpa[1]. This includes support of the following:

1. Establish permanent extension of the category two budget approach
2. Implement per-district or per-library system category two budget instead of per building calculations
3. Provide separate category two budgets for independent charter schools
4. Allow applicants to utilize category two budgets for non-instructional facilities
5. Establish the category two budget amount in the first year of the five-year budget block. Allow the applicant to adjust category two budget at their option if student enrollment for schools or square footage for libraries changes during the five-year budget block
   a. Reset category two budgets for all applicants beginning July 1, 2020
   b. End the category two budget for all applicants at the end of each five-year block
   c. Do not roll over category two budget at the end of the five-year block
   d. Synchronize all applicants so that everyone is on the same five-year cycle and all budgets reset every five years
6. Do not require repayment of category two E-Rate funding if enrollment (schools) or square footage (libraries) decreases during a five-year budget block
7. For purposes of calculating the category two budget:
   a. Allow separate institutions the ability to count students who attend their facilities even if the same student is counted at a separate institution.
   b. Do not include virtual students unless they attend classes in-person on a part time basis
8. Continue to provide E-rate category two funding support for Basic Maintenance of Internal Connections, Managed Internal Broadband Services, and Caching
9. Provide support for advanced firewall features

### B. Analysis of Category Two Budget Calculation Methods

KSLLC analyzed the five proposed category two budget calculation methods as listed below. In our opinion, the set five-year budget is the preferred method but with the option of the applicant to make adjustments if enrollment or square footage increases. Additionally, there needs to be a reset or "clean slate" for all applicants' category two budgets effective July 1, 2020. It is critical that the category two budget be calculated and used on a district-wide or library-system wide basis.

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[1] E-Rate Management Professionals Association Comments – Filed 8/15/2019. WC Docket No. 13-184

## B.1 Rolling Five-year budget – existing method

To calculate the applicant's rolling five-year budget, multiply the enrollment or square footage by that year's budget multiplier. Then subtract the previous four years' funding commitments (pre-discount). In this scenario the applicant never gets a true refresh of their category two budget and would always be subject to the previous four years' funding commitments.

## Rolling 5 Year Budget

- Calculate current years budget based on enrollment or square footage.
- Subtract the previous four year's commitments.

| Site | Enrollment | Pre-Discount | Category 2 Budget | | | | Total | Remaining |
|------|-----------|--------------|------|------|------|------|-------|-----------|
| | | | 2016 | 2017 | 2018 | 2019 | | |
| Elementary | 412 | $65,783 | $29,739 | $3,909 | $0 | $24,659 | $58,307 | $7,476 |
| Middle | 171 | $27,303 | $15,137 | $1,617 | $0 | $5,574 | $22,328 | $4,975 |
| High | 261 | $41,673 | $12,008 | $2,946 | $0 | $4,929 | $19,883 | $21,790 |
| | 844 | $134,759 | $56,884 | $8,472 | $0 | $35,162 | $100,518 | $34,241 |

## B.2 Set Five-year budget - preferred

A set Five-year budget approach would benefit everyone from the early stages of category two planning. This will be the most effective way to plan for the future and know exactly how much money will be available for the applicant. There could be a fixed budget to spend over five years, or this could be adjusted upwards with enrollment/square footage changes. This option is preferred but needs to provide applicants with the option to increase their budget with increase in enrollment (schools) or square footage (libraries).

## B3. Clean Slate for FY2020 - preferred

A clean slate approach would be the easiest and most straight forward option. This would give everyone a brand-new category 2 budget beginning in the 2020 year. You could then compound this with either a set 5-year budget or a rolling 5-year budget.

## B4. FY2020 Transition Year – difficult on applicants that already spent their budget

A FY2020 transition year would see the rules continue as is for one more year to give time for applicants to learn and understand the updated rules. This would give you one more year to use the remaining dollars in your original 5-year budget. This could potentially be harmful to applicants that have exhausted their full budget and would not allow them to request funding for the 2020 year.

## B5. 20% bonus -too difficult to administer

A 20% bonus each funding year would be a great way to maximize the amount of E-rate support that every applicant could request. Every applicant would calculate their budget in the first year and could

request up to that amount. Each subsequent year, 20% would be added into the budget to spend. Every applicant would not be allowed to request more than the original budget amount in any given year. This approach would guarantee that every applicant has category 2 money available to request every year. The 20% bonus method provides the highest reward to applicants who effectively use their budgets each year, but it would be the most difficult to administer.

## C. Survey Results – 156 Applicant Responses August, 2019 regarding Category Two Budgets

### C.1 Survey Respondents – Located in America's Heartland

During the period July 26, 2019 – August 14, 2019, KSLLC conducted a survey[2] regarding the category two budget methodology. 156 respondents completed the survey and 150 provided contact information. The majority of the respondents were located in the heartland as shown by the following map:



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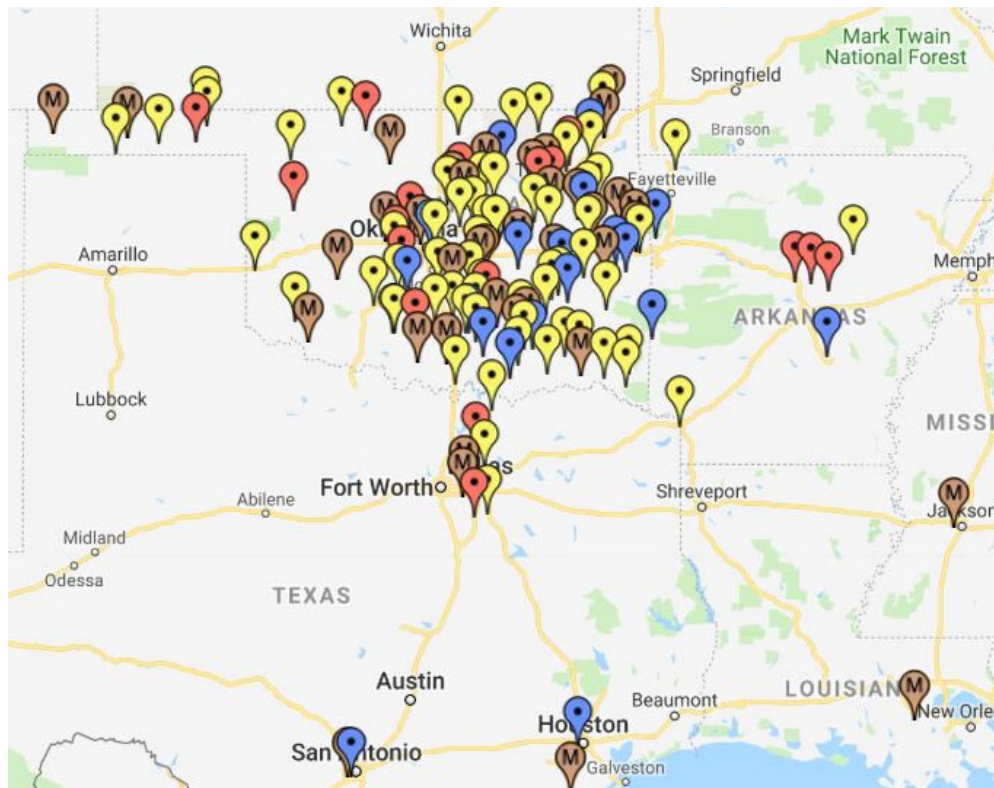
**C.2 Survey Respondents -majority represent school districts:**
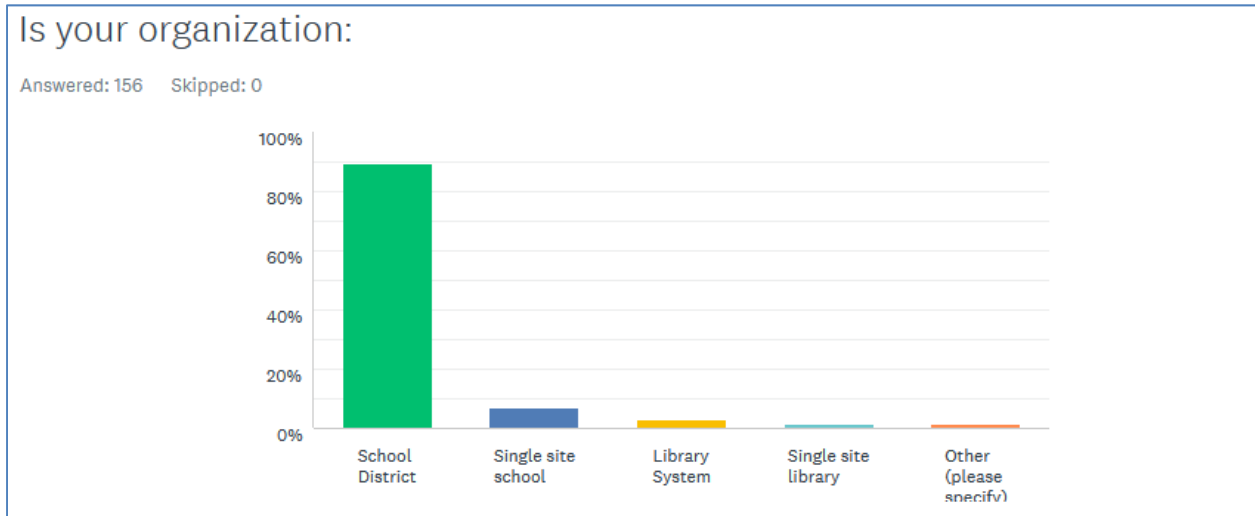


**C.3 Survey Respondents – majority used their category two budgets in the five-year period; 62% took advantage of category two funding in the first year (FY2015)**

The pie chart to the right shows the category two budget spending of the 150 respondents during the period FY2015-FY2019.

For this group's category two budget, 25% was spent in FY2015; 13% was spent in FY2016; 8% was spent in FY2017; 11% was spent in FY2018, 15% was spent in FY2019 and 28% was remaining after the five-year budget cycle.
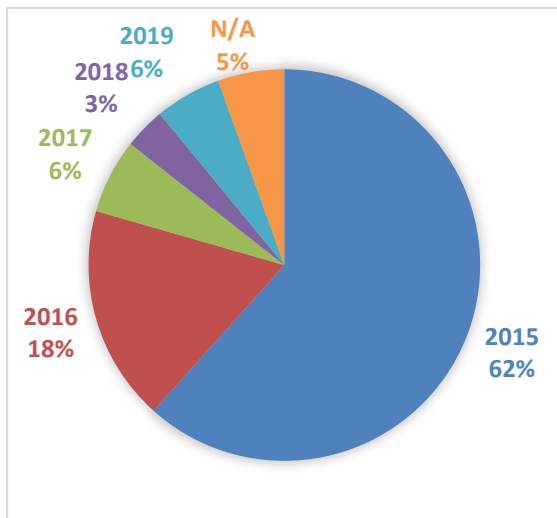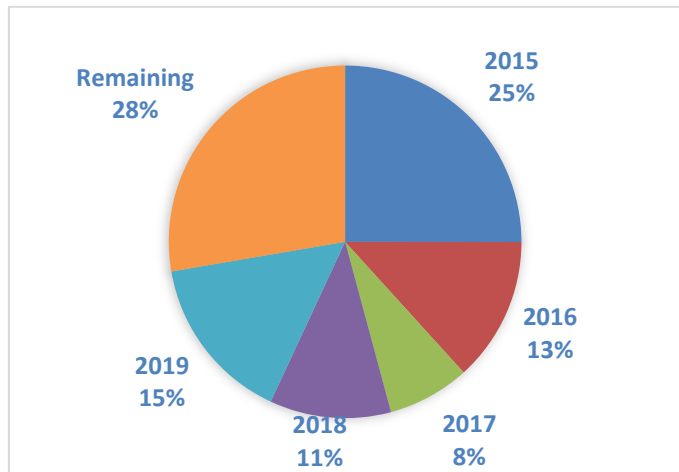




The pie chart to the left shows that 62% of respondents took advantage of category two funding in the first year of the category two budget method – FY2015.

## C.4 Summary of responses

Q1. Majority used their C2 Budget, only 8% did not spend C2 budget
Q2. If they did not use all of their C2 Budget, 46% said reason was due to per campus cap
Q3. 83% support a permanent 5-year category two budget
Q4. 45% support a minimum building budget of $20,000
Q5. 36% recommend a $250/per student budget amount
Q6. Majority had no opinion; 26% recommend $5.00 per square foot for libraries
Q7. 80% recommended five-year block feature; 70% recommend calculating budget in year 1 and only adjust if increase in enrollment or square footage
Q8. 91% support change to allow spending "per district" instead of "per campus"
Q9. 81% believe that if change to "per district" spending will be able to fully utilize C2 budget

## C.5 Rollover of C2 Budget between five-year blocks

KSLLC supports a new budget for all applicants between each five-year category two block. The reason we favor this method is that it will be much easier to administer than continuing applicant's category two budgets from one five-year block to the next.

However, several of the schools who responded made very good points as to why it would be responsible to allow for carryover of budget from one five-year block to the next.

Respondents pointed out that if you were planning well and using your budget wisely, you may end up not spending all of your allotted category two budget. School and library administrators are supposed to properly manage their budgets and having money left over at the end of a budget cycle may be an indication of well-planned spending.

Therefore, we suggest that the Commission review the record in the proceeding and determine if there is a way to provide a partial roll over of remaining category two budgets from one five-year block to the next. The Commission frequently used 20% since the budget is a five-year cycle. So, allowing an applicant to roll over 20% of their remaining budget to the first year of the next cycle would be reasonable. It would only work administratively if the Commission adopts a district-wide or library-system wide approach. Additionally, negative budgets would not be rolled forward.

## C.6 Survey Responses

The following questions and responses reflect the 156 respondents as follows:

*Question # 1 – Did you use the E-Rate Category 2 funding that was provided under the C2 five year budget?*
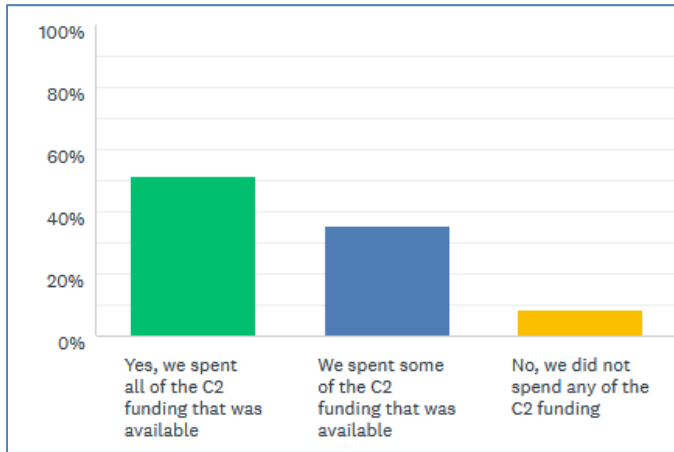


| ANSWER CHOICES | | RESPONSES | |
|---|---|---|---|
| ▾ Yes, we spent all of the C2 funding that was available | | 51.28% | 80 |
| ▾ We spent some of the C2 funding that was available | | 35.26% | 55 |
| ▾ No, we did not spend any of the C2 funding | | 8.33% | 13 |
| ▾ Comment/Explain: | Responses | 5.13% | 8 |
| **TOTAL** | | | **156** |

Comment/Explain:

We spent all except a few hundred dollars in the first year, then at a later date enrollment went up and so did our C2 funding, but there was still was not enough to file for those following years. – Preston Rowland, Keota Public Schools, OK

We spent all we could. We really needed to do more work at one site but ran out of money there and did not need all the money designated for another site. – Kathy Ingram, Tupelo Public Schools, OK

We have the money and we will make upgrades with the money before the end of the year – Ardis McCann, Academy for Academic Excellence, Dallas, TX

Very little to do anything with – Barbara McDonald, Ravia School, OK

If we have anything left over, it is because there wasn't enough to do any projects needed to maintain our network. $150 per student for a period of 5 years is nowhere near what is needed to maintain a fast, stable internal network. – Patrick Turner, Krebs Public School, OK

Yes, we spent as much as we possibly could – Erin Mason, Jackson Public Schools, MS

We spent all of our C2 budget – Shannon Vanderburg, Frederick Public Schools, OK

*Question # 2 – If you did not spend all of the funding that was available to you within your C2 Budget Cap, please check all that apply.*

| ANSWER CHOICES | RESPONSES | |
|---|---|---|
| We were limited by the C2 budget cap at the individual campus level | 46.32% | 44 |
| We could not come up with our non-discount share | 15.79% | 15 |
| We used bond money instead of E-rate for Category 2 products and services | 3.16% | 3 |
| We did not need to purchase any Category 2 products and services | 22.11% | 21 |
| We were not aware that we could get E-rate support for Category 2 products and services | 3.16% | 3 |
| Other (please specify) Responses | 22.11% | 21 |
| **Total Respondents: 95** | | |

Comment/Explain:

The amount of C2 left was too small to fund any project – Steven Koger, Wes Watkins Technology Center, OK

This year we will spend the remainder of our budget – Julie Roberts, Canadian Public Schools, OK

Some of our locations didn't need new/upgraded equipment – David Wu, Capitol Region Education Council, CT

We spent most of it, just not quite all of it. – Elliott Robertson, El Reno Public Schools, OK

We were limited on what we could buy with C2 – Joel Dean, Conway Public School District, Conway, AR

We used most of the C2 budget but had to allocate funds to basic maintenance that was not used. – Sherri Farley, Lukfata School District 9, OK

C2 funding for our rural school has been a blessing!! – Shayne Wallis, White County Central School District, AR

We spent a portion of the money just not all of it.-Ron Crosslin, Muldrow Public Schools, OK

We could have used more money! – Johnny James, Erick Public Schools, OK

Our needs as a district were great enough that additional funding would have been needed at several campuses to complete upgrades. We supplemented the Category 2 funding with a bond funded upgrade to meet our needs. Bond funding will not be available going forward, so any increase in funding will be utilized fully.- John Folmar, Sherman ISD, TX

We spent nearly all of the C2 money - as much as practical – Randel Osborne, East Haven Public Schools, CT

We have a big purchase cycle once every 5 years. not on 5th year yet. – Henry Horton, Richardson ISD, TX

*Question # 3 – Do you support a permanent five year budget for E-Rate Category 2 funding?*



| ANSWER CHOICES | RESPONSES | |
|---|---|---|
| Yes | 82.88% | 121 |
| No | 17.81% | 26 |
| **Total Respondents: 146** | | |
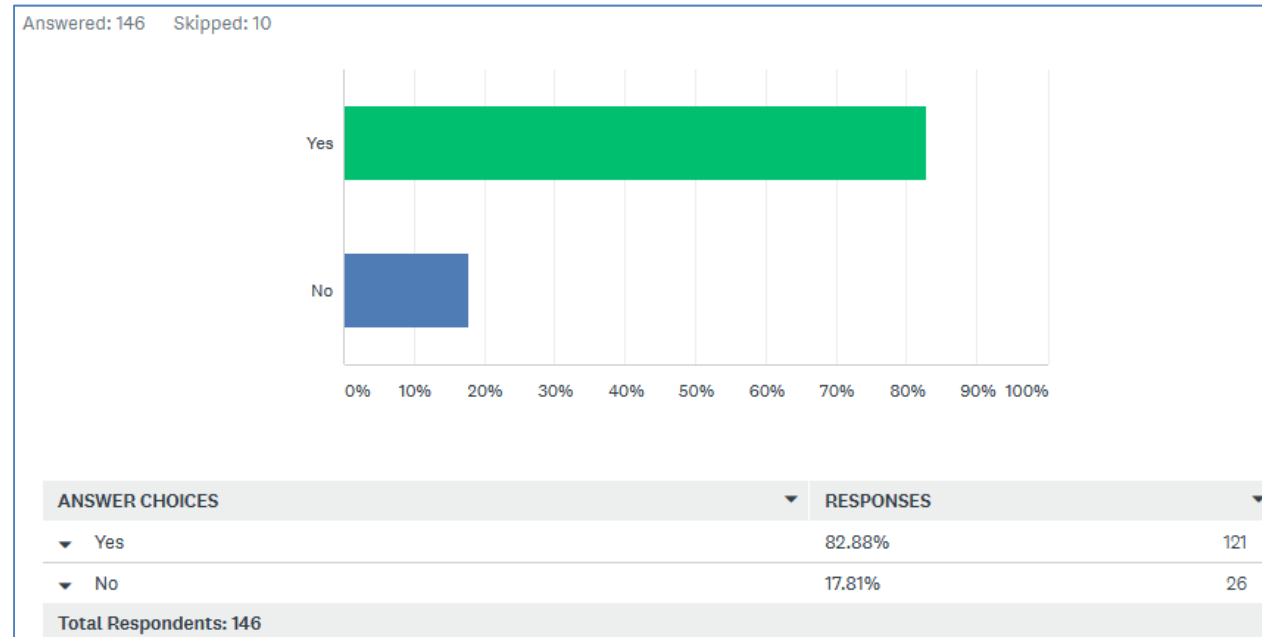
Comment/Explain:

Allows for greater planning and efficiency – Jeremy Jackson, Warner Public Schools, OK

The amount we receive does not cover the need – Julie Roberts, Canadian Public Schools, OK

I don't think that it should be that long, a lot of changes in 5 years. Beverly Tramble, Antlers Public Schools, OK

Needs to be shorter and higher amount per student. Patrick Turner, Krebs Public School, OK

The funding is very helpful especially for small rural schools – Amanda Tucker, Cherokee Public School, OK

With technology it's hard to predict what you are going to need in year 5. I really think the funds could best be used if we our funds were eligible from year to year. I conserved my money and I had to spend my remaining funds this year. We ended up out of pocket for some of our upgrades that were necessary. – Shane Wallis, White County Central School District, AR
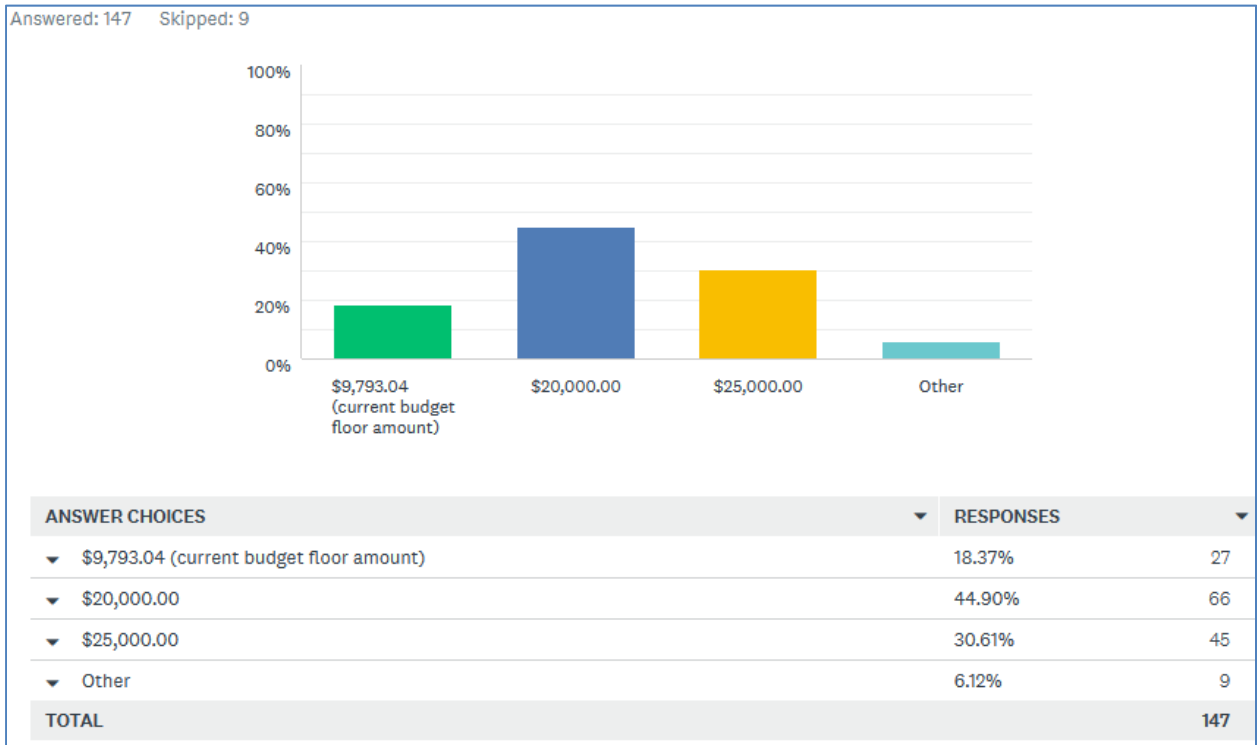
I like knowing how much money that I am going to have to spend so that I can spend accordingly vs wondering every year whether you will get any monies. – Sheila Brown, Rattan Public School, OK

This would help in planning. – David Unsell, Coalgate Public Schools, OK

I support it provided the five year is not a hard 5 year. In other words, if funding year arrives but I need to push to year 6 or 7 due to lack of need year 5 that would be good. – Charlie Shelden, Mid-Del Public Schools, OK

Before this model was adopted, we were never able to qualify for C2 funding because of our discount rate. This gave our school an opportunity to utilize the funds. – David Altom, Duncan Public Schools, OK

This money helps us stay current keeping up with technology. – Jan Cole, Duncan Public Library, OK

Planning is an important activity. If we know the amount of E-rate money we will receive, we can better plan to meet our needs. – Dr. Geary Brown, Cave Springs Public Schools

Not sure, I think there were some other options talked about. – Lori Patterson, Bartlesville Public Schools, OK

Too many things change in a 5-year period. I prefer the 2 of 5 rule. – Myrna Martinez, Harlandale ISD, TX

We would prefer something less fixed as a permanent 5-year budget. – Evan Beavers, Vilonia School District, AR

*Question # 4 – What do you think the minimum budget floor should be for small schools or libraries?*



Answered: 147    Skipped: 9

| ANSWER CHOICES | RESPONSES | |
|---|---|---|
| $9,793.04 (current budget floor amount) | 18.37% | 27 |
| $20,000.00 | 44.90% | 66 |
| $25,000.00 | 30.61% | 45 |
| Other | 6.12% | 9 |
| TOTAL | | 147 |

Comment/Explain:

It should be funded according to Equality within the school area. – Rodney L. Riles, Pine Bluff School District, AR

With the current scope and change in technology, to maintain equity with larger districts greater investment in infrastructure must be maintained. – Jeremy Jackson, Warner Public Schools, Warner, OK

As much as possible. – Michelle Stiles, Paden Public School, OK

With Technology becoming more and more implemented into the classrooms, it puts a lot more stress on the network. Many schools are still functioning on some very old equipment. Unless leasing, purchasing new network equipment (switches, routers, AP's, Firewalls, etc.) can be a considerable amount. – Mark Culwell, McCurtain Public Schools, OK

Depends on population served. Mary Moroney, Eastern Oklahoma District Library System, OK

This is assuming a 'small school or library' is at least 10 rooms. Smaller buildings may not require this much. – David Wu, Capitol Region Education Council, CT

The equipment costs the same no matter how many students/staff you are supporting.  -Lori Patterson, Bartlesville Public Schools, OK

$12000 - $15000. – Royce Bell, Bokoshe Public School, OK

*Question # 5 – What do you think the per student rate should be to adequately support your technology needs?*



Answered: 152    Skipped: 4

| ANSWER CHOICES | RESPONSES | |
|---|---|---|
| $159.66905932 (current per student rate indexed for inflation each year) | 20.39% | 31 |
| $175.00 | 24.34% | 37 |
| $250.00 | 36.18% | 55 |
| $300.00 | 14.47% | 22 |
| Other (please specify)    Responses | 4.61% | 7 |
| TOTAL | | 152 |
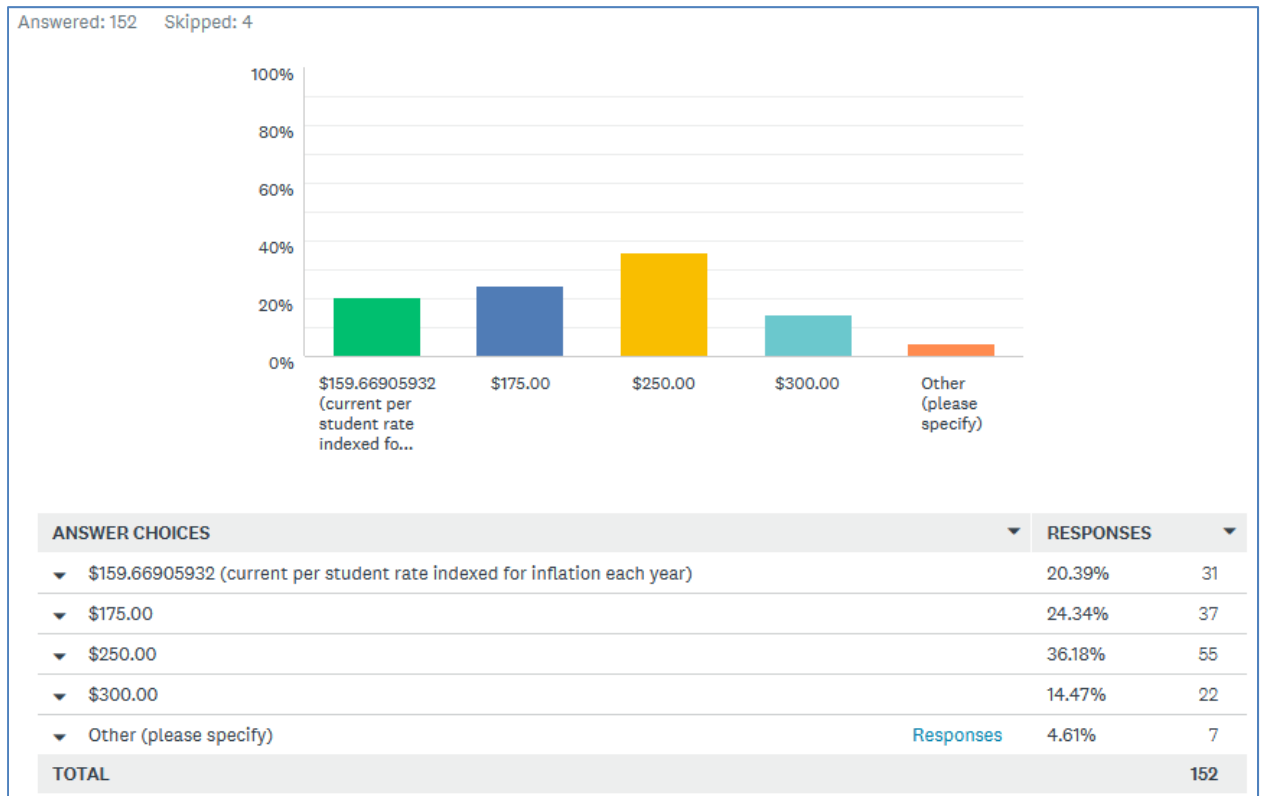
Comment/Explain:

We need to get rid of site budgets and allow it to be applied at the district level. Needs based resource allocation. - Eric Hileman, Oklahoma City Public Schools, OK

I think there has to be a base for small schools and then a per student ratio. I understand small schools need fewer devices, but just tens of thousands may not be enough to meet the needs. – Kathy Ingram, Tupelo Public Schools, OK

$600 – Patrick Turner, Krebs Public School, OK

Assuming 20 students per classroom, 20*$160=$3,200. One WIFI access point per classroom should be doable for $1,000 per WAP, including cabling.  Leaves enough funds to purchase firewall and core switch if averaged out per classroom. -David Wu, Capitol Region Education Council, CT

Current rate is not even close to enough money. The other thing is setting a floor limit like 250 or 300 may not work as inflation goes up. We also have to be cognizant of potential tariff issues with foreign countries. 250 could be the floor of the budget and at least help us to have a budget to see what we can get for that. But it can't stay at a flat rate like that year over year. – Jason Ridenour, Ponca City Public Schools, OK

The per student rate does not help in schools with lower populations. A $6,000.00 piece of equipment costs the same whether you have 100 or 1000 students. We have large population and low population schools. If we upgrade the edge switch it costs about the same for both schools, however the burden is on the district to fund more of the purchase for smaller populations even though the need is equal. – Charlie Shelden, Mid-Del Public Schools, OK

*Question # 6 – What do you think the amount per square foot for libraries should be?*

Answered: 154    Skipped: 2



| ANSWER CHOICES | | RESPONSES | |
|---|---|---|---|
| ▾ | $2.45 for rural locations and $5.32 for urban locations (current rates indexed for inflation) | 9.74% | 15 |
| ▾ | $5.00 per square foot regardless of rural or urban location | 28.57% | 44 |
| ▾ | $5.50 per square foot regardless of rural or urban location | 20.13% | 31 |
| ▾ | No opinion | 40.26% | 62 |
| ▾ | Other (please specify)                                    Responses | 1.30% | 2 |
| **TOTAL** | | | **154** |
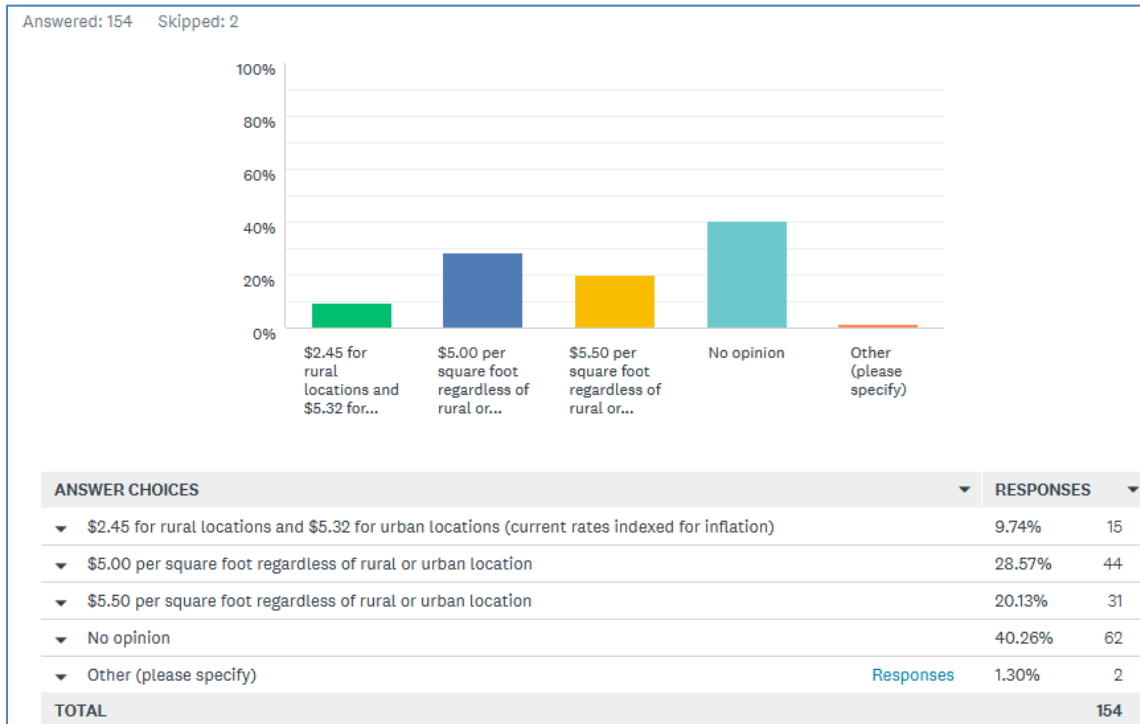
Comment/Explain:

At least $5 per sq. foot. The rural libraries have less funds and need this support of funding, perhaps more so than the urban locations. – Gail Currier, Southern Oklahoma Library System, OK

*Question # 7 – Check any of the features below you support regarding the five-year budget:*

| ANSWER CHOICES | | RESPONSES | |
|---|---|---|---|
| ▾ | Applicant will have a five year block of time to spend up to the C2 budget cap amount | 80.39% | 123 |
| ▾ | C2 Budget cap for each five year block is established in year one based on student enrollment or library square footage | 28.10% | 43 |
| ▾ | C2 Budget cap amount is adjusted only if increase in student enrollment or library square footage during the five year period | 70.59% | 108 |
| ▾ | No rollover of unused funds between five year budget blocks. Start with new C2 Budget Cap every five years. | 20.26% | 31 |
| ▾ | Comment/Explain:                                         Responses | 5.88% | 9 |
| **Total Respondents: 153** | | | |

Comment/Explain:

School districts should work to be as efficient as possible. Any funds remaining should go back to fund other requests. -Joe Jennings, Tulsa Public Schools, OK

I feel if a school had C2 money that could roll over it could help with big projects, but it could also be difficult to keep track of this. – Preston Rowland, Keota Public Schools, OK

Increases should be based on a threshold of growth, set by percentage of students gained. Schools should not become eligible for increase unless number of students increased is above 12% of their previous year total. – Jerry Swayze, Purcell Public Schools

Rollover is better, simply because if you don't allow this it forces schools to purchase equipment they may not need. If they could rollover the amount they would then be able to use it for NEEDED equipment in the future. – Mark Culwell, McCurtain Public Schools, OK
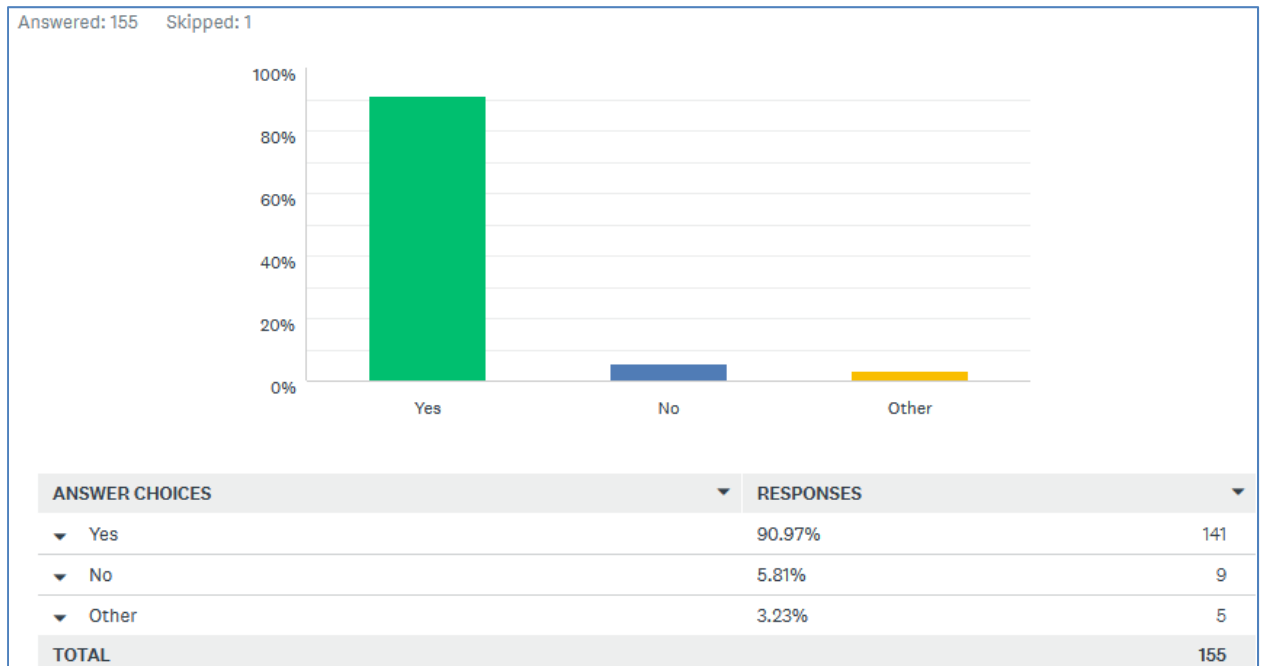
I don't know why there couldn't be at least a partial rollover of unused funds. – David Odum, Wanette Public School District, OK

I would support the rollover if that amount is not counted against the "new budget" and would roll over and be added to the entire new budget allocation. I could live with something similar to rules for other federal funds that say you can't roll-over more than X% as that encourages people to spend their money down, but at the same time, can save a little to add to the next budget cycle. This promotes planning and not just spending! -Erin Mason, Jackson Public Schools, MS

I think we should be able to rollover funds. – Jan Cole, Duncan Public Library, OK

C2 Budget cap should be an average of last two or three year ADM. This allows for the adjustments necessary to keep schools solvent. Schools should be able to carry over a percent of budget without penalty. Dr. Geary Brown, Cave Springs Public Schools, OK

## *Question # 8 – Do you support changing the C2 budget method to allow spending "per district" instead of "per campus"?*



Answered: 155    Skipped: 1

| ANSWER CHOICES | RESPONSES | |
|---|---|---|
| Yes | 90.97% | 141 |
| No | 5.81% | 9 |
| Other | 3.23% | 5 |
| TOTAL | | 155 |

Comment/Explain:

This would allow schools districts to be more flexible in meeting equity based on what each school actually needs. – Joe Jennings, Tulsa Public Schools, OK

This will not make a difference for our district - so I do not have data to determine the impact of this change. – Michel Leask, Fields Memorial School, CT

1 billion percent agree with this. – Eric Hileman, Oklahoma City Public Schools, OK

The district as a whole should receive the C2 budget to support both sites. The district combines all other funding because one site may have a need when the other does not and vise versa. One of our sites had an upgrade this year but is not receiving all of the bandwidth because we could not upgrade the switches due to the C2 budget for that site. There was only money left for the other site. -Ruby Phelps, Belfonte Public School, OK

For rural schools, it would be a major help. Right now, most of our funds are directed toward the elementary as that is where the numbers are the highest. Some years, we need to do work in the high school and there is no funding available due to the "district" restrictions. – Louemma Larman, Coyle Public Schools, OK

Our District shares one campus and complicates when funds are there for one site but not the site that truly needs C2. This is wasteful. – Linda K. Green, Boswell Public School, OK

This would help us so much! – Kathy Ingram, Tupelo Public School, OK

Spending per district would provide flexibility to adjust where needed but I could see people gaming the system to favor one school over another. Assuming people are going to be fair in their distribution of equipment would be naive. – David Wu, Capitol Region Education Council, CT

For example, if you had switches hit by lightning (which we did) it would be nice to be able to move your existing equipment around so that the needs of the district were met instead of having to worry about which site it was purchased. – Sheila Brown, Rattan Public School, OK

Head of network is more important than any individual site and usually the most expensive. Spending large amounts of money to build a network operating center (NOC) with proper cooling, power redundancy, surge protection and generators so that your core district infrastructure will always be up does no good when you have to put what should be main core pieces in school buildings without all of those things just so you can afford them (wireless controllers etc.,). I can do more good for more students by placing key infrastructure pieces that are extremely expensive in my NOC so it services all of my students and schools. – Jason Ridenour, Ponca City Public Schools, OK

This simplifies the process when ordering hardware. Switches remain static after install, but access points can be moved if they are not working properly and installed on another campus. – John Folmar, Sherman ISD, TX

The current rule only hurts our smaller schools in our district as they cannot afford to purchase much of anything. This change will let the people who work at the schools determine where best to place the technology. – Kenny Davis, Cossatot River School District, AR

Yes I think, without knowing details of course. This could be used to address the concerns in question #5 (per student cap) – Charlie Shelden, Mid-Del Public Schools, OK

I think it should be an option if we are rolling out an initiative which affects all sites. – David Altom, Duncan Public Schools, OK

Some schools/libraries have differing needs so it would be nice to be able to pull from the resource for the ones that need it the most. I had one library that was fairly well situated and another that we just remodeled and reopened that needed everything. It would have been wonderful to share the funds. – Jan Cole, Duncan Public Library, OK

This is the most important rule to change – Stacy Ezell, Haskell Independent School District 2, OK

YES! YES! YES! – Lori Patterson, Bartlesville Public Schools, Bartlesville, OK

## *Question # 9. If the change is made from a per-school or per-library budget to a per-district or per-system budget for category two services, which of the following will be true for your school or library.*

| ANSWER CHOICES | RESPONSES | |
|---|---|---|
| We will be able to effectively utilize C2 funding based on the specific needs of our individual schools or libraries | 80.92% | 123 |
| There would not be a difference on how we spend the C2 funding | 21.71% | 33 |
| Total Respondents: 152 | | |

## *Question #10. Please provide any other thoughts or concerns you have regarding changes to the E-rate Category 2 budget cap*

Rural schools have a much harder time raising funds than urban schools based on district valuation. We must be able to prepare and expose our kids in an equitable manner. – Jeremy Jackson, Warner Public Schools, OK

Sometimes needs change between library branches. We need to be flexible about where equipment can be used. - Mary Moroney, Eastern Oklahoma District Library System, OK

We need to be able to buy systems to manage, monitor, and shape the bandwidth. Just providing data is no longer sufficient. We must provide a safe and secure computing environment. Todd Borland, Union Public Schools, OK

The allocate funds usually does not alleviate all of the problems faced by a particular campus. The campus with the greatest need tends to be the one with less students. – Franklin Caspa, Promise Community School District, TX

Having Category 2 funds allowed us to upgrade a lot of equipment for our schools. It allowed us to make changes across the entire district rather than making changes in phases. Without these funds we would not have been able to upgrade our equipment. -Amanda Tucker, Cherokee Public School, OK

C2 funding is vital for our school district. As great as the funding has been for our school district, it would benefit schools even more if more items were eligible, e.g. computers, interactive boards, network management software and services, IP phone systems (VoIP ). Thank you thank you and thank you!!! -Shayne Wallis, White County Central School District, AR

The current per school allocation punishes schools with small enrollments and does not encourage Districts with large schools to manage equipment life-cycles in an efficient manner. All schools are not the same age, nor are all schools constructed with the same building materials. The amount of money and infrastructure required to provide adequate Internet Access in older schools is not the same as is required in newer construction. In many urban areas, older schools are also smaller as they were designed as neighborhood schools. In those cases, a small budget and an old building mean Districts must bridge the infrastructure gap with local funds to ensure Internet equity. Resources in a District are always managed in the most equitable manner for every school and every student. Districts should be permitted to manage E-rate budgets the same way and ensure an equitable educational environment at all schools. – Erin Mason, Jackson Public Schools, MS

Please keep the 5-year plan as it allows prior planning of resources. – Ron Crosslin, Muldrow Public Schools, OK

It needs to be increased as the need arises with increased student count, however it doesn't need to decrease if we lose a few students, as we will inevitably fluctuate year to year. -William Bray, Atoka Public Schools, OK

It just needs to be more. -Jason Ridenour, Ponca City Public Schools, OK

The Category 2 changes three years ago were a life saver. Infrastructure upgrades for my district would have been cost prohibitive and student/teacher access to network services would have been impacted without the funding available. Moving to a per-district model of funding would make putting the correct hardware in the correct campus easier and would make it easier to ensure funding is always used appropriately and completely. – John Folmar, Sherman ISD, TX

As a small rural school, this funding is crucial to us being able to provide a high-quality education to our students. We never have a problem using all of the funds to upgrade our infrastructure in order to keep up with the increasing demands of technology. Being able to use the funds on a district-wide basis would be very helpful in that it would allow us the flexibility to meet the needs of both of our sites. We are a consolidated district with sites in two different communities. – Jerime Parker, Amber-Pocasset Public School, OK

Would prefer they stop tracking equipment by school and reduce the 10-year records/inventory requirements to something more reasonable. -Kevin Calvert, Stillwater Public Schools, OK

I fully support the District-wide budget model. The per-school limitation prevented our district from efficiently utilizing the services that USAC provides. -Shawntee Cowan, Duncanville ISD, TX

Some of our schools are larger or laid out in a way it costs us more in C2 funds. -Kaitlin Bouziden, Alva Public Schools, OK

I am grateful for this money. It has allowed us to provide best technology services to the public. -Jan Cole, Duncan Public Library, OK

Schools and libraries do not receive enough E-rate funding. – Dr. Geary Brown, Cave Springs Public Schools, OK

Please change the funding from per school to per district. – Stacy Ezell, Haskell Independent School District 2, OK

With the ever-increasing demand for new technologies and the rapid turnover of technology into obsolescence, more funding needs to be available to better allow schools to keep pace. -Bob Cochran, Boise City Public Schools, OK

Costs of technology is high and requires more funding to utilize plans for upgrades and replacing older hardware. – James Eberts, Hardesty Public Schools, OK

We are thankful for E-rate funds! The Category 2 allowed us to put a WAP in each classroom this year. I do wish that server upgrades and maintenance would be included again. -Royce Bell, Bokoshe Public School, OK

The 2014 Modernization Order was intended to simplify the process. The change from per-district to the current per-school allocation greatly multiplied the amount of time and effort needed to manage the C2 funds. If no other changes are made, moving back to a "per-district" allocation will greatly support the needs of our District. – Myrna Martinez, Harlandale ISD, TX
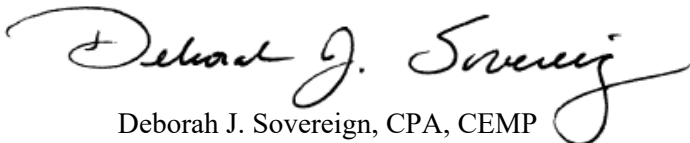
The 10-year requirement on keeping records is excessive. Maybe a 5-year record from the date of purchase of the equipment. Also, being able to relocate equipment based on school needs. We have school populations that fluctuate yearly and some of the equipment from one school could be moved to another. – John Curran, Frisco ISD, TX

## D. Conclusion

Kellogg & Sovereign® Consulting sincerely appreciates the opportunity to submit comments regarding the category two budget methodology.  As you can see by the enthusiasm and appreciation of the respondents to the survey, the category two budgets have made a very positive impact on assisting schools and libraries across the United States to have affordable access to advanced information services in meeting the Commission's goals of the E-Rate program.  Thank you in advance for carefully considering all of the comments submitted and for preserving and promoting this valuable program that truly bridges the digital divide for our students and communities.


Respectfully submitted,


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