



**CONFEDERATION OF OREGON SCHOOL ADMINISTRATORS**

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Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554  
August 2, 2019

RE: FCC Notice of Proposed Rulemaking, E-Rate

Dear Chairman Pai,

I am writing today representing over 2,500 school and district administrators in Oregon as Executive Director of the Confederation of Oregon School Administrators (COSA) in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate. Together, our school and district leaders serve over 580,000 K-12 students in Oregon. Our state's school districts are diverse: from big, urban districts in the Willamette Valley to small, rural districts east of the Cascade Mountains. COSA is opposed the proposed rule changes and believe they will negatively impact students in Oregon.

I want to thank the FCC for its continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist Oregon schools to obtain affordable telecommunications and Internet access. E-Rate dollars have been critical resources to Oregon school districts, allowing districts to invest in infrastructure that improves the education that students receive. Schools have offered programs ranging from professional development to credit recovery to greater access to diverse curricular options because of E-Rate resources.

The E-Rate program, and the USF program more broadly, are succeeding in their mission. As the FCC moves forward with this public notice, we wish to join supporters from across the country in emphasizing that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).



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We are concerned that the proposed rule will unnecessarily pit public schools against rural health care, resulting in an arbitrary funding pressure that will undermine and threaten the great progress of E-Rate. That is why COSA is opposed to the rule as drafted. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The administrators that we represent have a responsibility to balance the budgets of their districts and their schools annually. The lack of certainty that would accompany these rule changes could negatively impact school districts' ability to build out connectivity that will meet the learning needs of their students.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity -- specifically, access to high-speed broadband. We urge the FCC to support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

Thank you for consideration.

Sincerely,

Craig Hawkins  
Executive Director  
Confederation of Oregon School Administrators (COSA)