



**Vision:**  
100% Student Success

**Mission:**  
"Educate and prepare each student for college, career and life."

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

August 07, 2019

Chairman Pai,

I am writing today on behalf of the Pinellas County School Board in Largo, Florida 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. Before delving into my response to the proposed changes, 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 schools (like ours) to obtain affordable telecommunications and internet access.

As the Director of Telecommunications for our District I have overseen the appropriation and the distribution of eRate dollars for many years. While we have had extreme difficulties dealing with the plethora of rules issued by USAC, I must say that the funding provided has been a huge help to our making communication infrastructure available to our students, faculty and staff. As the 27<sup>th</sup> largest school district in the U.S. the District has over 140 locations and 130,000 students including those in postsecondary programs. The sheer size and scope of providing quickly accessible content to this many students takes a great deal of resources in terms of bandwidth, personnel and equipment. Now as we are in the process of applying for Dark leased fiber we are embarking on a new level of service that will help our district reach new levels of student success.

Without the funding provided by eRate we would find it difficult if not impossible to continue moving forward with our modernization efforts. We are in the process of upgrading our internal switching connections, our WAN as well as our Internet connections and firewall equipment. This is a never ending effort to stay ahead of demand and provide the best possible chance for high student outcomes. We do feel that we are winning the race but we need the help of the FCC via the E-Rate program to get there and maintain that status.

The E-Rate program, and the broader USF program, is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact 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).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role is the rapid and significant expansion of connectivity in schools, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

I am opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. 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 proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries.

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Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to 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). A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

At this time we use eRate Funding for:

**Our wide area network services between our school locations and our Data Centers.** We currently use Spectrum charter for fiber connections as a leased lit service. We are hoping to have lease dark fiber in place before the end of our current contract that ends on 6/30/2020. The cost of this is 14 million dollars over 10 years. This is only a marginal increase over our current contract but is providing 10 to 100 times the bandwidth depending on the optics that we use. This is still a lot of money that come from operational funds. We need to keep those funds in the class room. If the District has to support this on our own it will have a serious impact on our budget.

**Our internet service** is supplemented by the eRate program. Those connections are approximately \$200,000.00 per year and will hopefully only increase slowly as the price for bandwidth has gone down but I needs increase every year.

This category 1 funding has been critical to our operations.

**We have unfortunately not benefited from the category 2 funding to date.** We have applied for over 2 million dollars per year for all 5 years to assist with the installation of our wireless infrastructure and our switching. We have been in an unusual appeal situation over the bid for our wireless. The apparent inability of USAC to deal with this correctly led to an appeal to the FCC. That appeal has languished there for over 2 years. Because of this, even though we are not red lighted we have not had any of our applications processed. So as of this time we have only received approximately 1 million dollars of the 11 million that was supposed to be available to us and we will have to return that funding if we lose the appeal. We have been very disappointed in the handling and the results of the program. But we strongly suggest continuing the funding as it would be very helpful if we were ever able to obtain any of it.

**The funding is extremely important and should be continued.** However the utter incompetence of USAC in the handling and disposition of the program has made it impossible to deal with up to this point. Just the fact that there is an entire industry of consultants thriving because the system is too difficult for districts to navigate the constantly changing rules is proof enough that something is very wrong. We are not here to steal or misappropriate funds. We adhere to State and Federal purchasing laws as well as district policy and yet it is still not sufficient.

Despite these issues we do not wish to return to the days where priority2/category2 funds were simply never available. We have a lot more to do to upgrade our current aging category 2 equipment to be able to take advantage of our newly upgraded WAN.

In closing, I reiterate my district's continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning. Thank you for considering these comments.

Sincerely,

*David Galvin*

Dave Galvin

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Pinellas County Schools

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