



DR. ANDY ASHLEY
SUPERINTENDENT

DISTRICT OFFICE
1502 NORTH HILL STREET
NEWARK, ARKANSAS 72562

CEDARWOLVES.ORG

870-201-2577

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

August 21, 2019

Dear Chairman Pai,

I am writing today 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 mine) to obtain affordable telecommunications and internet access, as well as the equipment necessary to provide this connectivity.

My district is a small rural Arkansas district with an enrollment of approximately 800 students and a with a Category 1 discount rate of 90% and Category 2 budget discount rate of 85%.

The financial challenges for my district are so great, without E-rate funds to supplement minimal technology budgets, our students could lag behind other students throughout the country who have more opportunities as a result of advanced technologies.

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).



DR. ANDY ASHLEY
SUPERINTENDENT

DISTRICT OFFICE
1502 NORTH HILL STREET
NEWARK, ARKANSAS 72562

CEDARWOLVES.ORG
870-201-2577

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 in 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. An additional challenge is how to determine who has the greatest need and how the funds would be allocated between E-rate and Rural Health Care.

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. 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.

My district intends to apply for Category 1 funding for the upcoming funding year. As of yet my district has not had the additional budget dollars to implement the major upgrade that is needed to keep pace with the continuing need for high-



DR. ANDY ASHLEY
SUPERINTENDENT

DISTRICT OFFICE
1502 NORTH HILL STREET
NEWARK, ARKANSAS 72562

CEDARWOLVES.ORG
870-201-2577

quality broadband services. Many of today's educational resources require more and more bandwidth. E-rate funding for both Category 1 and Category 2 is critical to enabling my district to take advantage of these resources.

I urge you to continue funding Category 2 projects as well as a full reset of the Category 2 budget every 5 years. Additionally, an increase in the per pupil funding is greatly needed. It's also important to provide funds district-wide instead of based on each campus enrollment. A district-wide formula will allow the school district to apply our funds to our schools with the greatest need. We strive for equity at each of campuses. Continuing the current scenario of Category 2 funding means we would have to use more of the operating budget for enough infrastructure, thereby, reducing funds available for other student resources.

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,

Dr. Andy Ashley
Superintendent
Cedar Ridge Schools

