



Federal Communications Commission

Association of Alaska School Boards
1111 West 9th Street
Juneau, AK 99801

RE: Notice of Proposed Rulemaking in the Matter of Universal Service Contribution
Methodology WC Docket No. 06-122

Dear Sir,

We are writing to express our concern about the proposal to place a cap on the Universal Service Fund as well as a sub-cap on the E-Rate and Rural Health Care Programs.

The E-Rate program is critical to Alaska as educational technology is becoming more important to the delivery of instruction in both urban and rural settings. As you are aware Alaska is a vast state with distances between infrastructure and support like nowhere else in the entire nation. Broadband is limited and districts must devise “work-arounds” to deliver the most basic of services. Currently the Alaska standard of basic broadband is 10 Mbps. There is pending legislation to raise that standard to 25 Mbps and in fact our department of education has only recently received a waiver to allow for the increased E-Rate funding that would come with this to not affect the Federal Disparity Test for Alaska. However, even this increase in the standard falls far short of the FCC short-term goal of 100 Mbps per 1000 students.

Alaska has limited technology providers. Our sparse, wide spread communities make it impossible for a private company to provide the competitive pricing available in the lower 48. As a result technology is one of the most expensive line items in a school district budget. Any loss of funding or limitations on allowable services would negatively impact the education of the 130,000 students in our state. There would be a loss of core course offerings, electives, research tools, connections with partner schools and communities, communication opportunities, library resources, and connectivity to the world outside of Alaska. The inability to afford increased access to the internet world is an equity issue for our students. We firmly believe that until we are able to offer the same education to every student in our state becomes a reality that we are denying our children a basic civil right – that is the right to obtain an education on par with students in the lower 48.

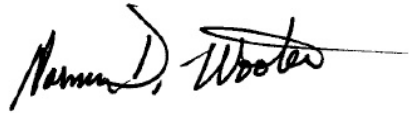
The Association of Alaska School Boards, on behalf of Alaska's local school districts, is adamantly opposed to the Notice of Proposed Rulemaking (NPRM) for placing a cap on the Universal Services Fund (USF) as well as a sub-cap on the E-Rate and Rural Health Care programs. This proposed rule would lead to competition among the four USF programs. We believe this flies in the face of the intent of the creation of the E-Rate program within the USF of the Telecommunications Act of 1996. Additionally, we believe it unnecessary as all four programs, including E-Rate, already have individual caps to ensure efficiency within each program.

Given the disparity among school district access to the Internet, both across the nation and specifically in Alaska, we find it incredibly disingenuous to even consider implementing processes that would limit access. The federal government should instead be looking for ways to increase access to ensure our students have the tools for us remain competitive in the world marketplace.

Thank you for the opportunity to comment on this proposed rule. Please contact the Association of Alaska School Boards should you need additional information from Alaska.



Tiffany Jackson
President



Norman D. Wooten
Executive Director