



BOARD OF COOPERATIVE EDUCATIONAL SERVICES  
301 W. POWELL \* PO Box 98, HAXTUN, CO 80731 \* 970-521-2771

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

August 20, 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. 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.

The Northeast Colorado Board of Cooperative Educational Services (NE CO BOCES) is concerned with, and opposed to, capping the Universal Service Fund. We are concerned with the growing needs within the e-rate program being pitted against the needs of Rural Health Care (RHC). Both programs have value to rural communities and should not be in direct competition against each other.

The demand for equitable access to broadband in rural schools is only going to grow with an additional increase in needs for Category 2 funds necessary to upgrade internal connections as broadband access increases. Many rural districts are living with antiquated systems that do not support the needs of growing broadband access.

The increasing costs in the RHC program should be evaluated within its own program to determine best practices. The reality of increasing demand and skyrocketing costs within RHC creates a scenario where one USF program is pitted against another, with rural schools competing with rural health care for connectivity needs. If other programs are exceeding their program cap then each program should be evaluated alone to determine efficiency, fairness, accountability and sustainability within their own program under the FCC.

Sincerely,

A handwritten signature in blue ink that reads "Arlene Salyards".

Arlene Salyards  
Special Projects Director