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SPRINGFIELD PUBLIC SCHOOLS - SPRINGFIELD, MASSACHUSETTS

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August 22, 2019

Chairman Ajit Pai
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Chairman Pai,

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice (06-122) 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 increasing the E-Rate funding cap in 2015.

The Springfield Public Schools district is opposed to the proposal to institute an aggregate cap on the Universal Service Fund. Our district serves 25,500 students across 61 schools and nearly 80 percent of our students are economically disadvantaged. The students in Springfield ought to have the same educational opportunities as students anywhere in our country and the E-Rate program has been vital to ensuring our students' access to technology.

Instituting an aggregate cap on the USF would put the multiple programs under USF in competition with each other for funding. The Public Notice highlights that the funding demands for the Rural Health Care (RHC) program have been growing and presents the possibility of an aggregate cap resulting in shifting funding from a program like E-Rate to another USF program such as RHC. Both are worthy programs with significant needs, but USF already has program-level caps and each program should operate as efficiently as possible within their respective caps.

The Public Notice also highlights that demand for E-Rate has not come close to the level of the E-Rate program cap since it was increased in 2015. This further raises our concern that E-Rate funding will be shifted to other programming. E-Rate demand has not approached the cap largely because in 2015 the FCC instituted a per student cap on schools' and libraries' ability to apply for Category 2 funding (\$150 per student over five years). The per student cap has had significant negative consequences in the Springfield Public Schools (and other urban school districts). Previously, our district was able to rely on Category 2 funding for both internal connections (to upgrade aging infrastructure in our buildings) and basic maintenance to sustain the existing infrastructure. Since institution of the per student cap, our district has only been able to use Category 2 funding to maintain the infrastructure already in place over the last five years. Eventually, this infrastructure will require upgrade and/or replacement.

We realize the amount of the per student cap is not the subject of this Public Notice, but we are concerned that a decision to shift funding from E-Rate to other USF programs may be driven by "reduced demand" for E-Rate that is actually a function of the per student cap instituted by the FCC.

Again, we are appreciative of the FCC's ongoing support of our students through the E-Rate program and we urge the Commission to continue with program-level caps and reject proposed aggregate cap on USF funding. Thank you for your consideration!

Sincerely,

Daniel J. Warwick
Superintendent of Schools