

August 26, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: WC Docket No. 06-122; FCC 19-46

Dear Ms. Dortch:

I am writing to provide reply comments of the Council of Chief State School Officers (CCSSO) on the Federal Communication Commission's (the Commission's) proposed rule on the Universal Service Fund (USF), as published in the Federal Register on June 13, 2019. CCSSO is a nonpartisan, nonprofit membership organization representing public officials who head elementary and secondary education agencies in the states; the Bureau of Indian Education; the Department of Defense Education Activity; the District of Columbia; and five U.S. extra-state jurisdictions.

CCSSO endorses the comments of the State Education Technology Directors Association, the Kentucky Department of Education, the Wisconsin Department of Public Instruction, the California Department of Education, and the New Mexico Public School Facilities Authority, opposing the proposal to establish a single cap over the four unique USF programs and advising against a combined cap covering only E-Rate and Rural Health Care. As reflected in these and CCSSO's July 29 comments, states are deeply concerned that the proposed rule would, if implemented over the strong objections of educators across the country, harm students' opportunities to access 21st century education services. Most concerning is that the proposed merger and possible funding cap reduction could reduce awards to all applicants under these programs.

CCSSO advises against the creation of a single cap covering the four USF programs or a more limited cap covering only E-Rate and Rural Health Care. To combine and perhaps lower the overall funding cap for the two programs can only serve to harm the communities that these programs were created to aid. We strongly support maintenance of the current, separate cap for E-Rate, along with continuation of a cost-of-living adjustment for this cap.

CCSSO and our member states share the Commission's concerns in promoting efficient and effective uses of limited E-Rate funds. CCSSO has in the past and continues today to advocate for the most effective use of scarce resources. We stand ready to coordinate closely with the Commission to ensure that states and districts can take greater and more efficient advantage of the program. Any streamlining and greater efficiency in the program can provide more digital

learning opportunities to students, particularly those in areas of the country that are the hardest to serve and benefit most from the supports that E-Rate currently provides.

If I may be of any additional assistance to the Commission as it reaches a final decision on this important issue, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, reading "Carissa Miller".

Carissa Moffat Miller
Executive Director
Council of Chief State School Officers

