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

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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 school districts (like mine) to obtain affordable telecommunications and internet access.

Highline Public Schools is an urban district that educates just under 20,000 students in grades K-12 in the communities of Burien, Des Moines, Normandy Park, SeaTac and White Center in Washington State. The district has 33 schools, employs more than 2,000 staff, and offers a wide variety of educational opportunities from early childhood to college preparation. We have just under 100 primary languages, a free and reduced population of 68%, and an English Language Learner cohort of 26%. Our graduation rates have steadily increased over the last 6 years to 81.1%, in part due to technology. That said, our school infrastructure has been modernized; thus, utilizing resources that accompany the E-Rate program. These improvements include inside wiring, switches, telephony, wireless access points, and bandwidth upgrades. With these changes, Highline has been able to provide higher-order thinking opportunities to students and increase opportunities for students to recover lost credits.

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).

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.

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.

Without funds associated with E-Rate, Highline's infrastructure would be antiquated and insufficient to meet the educational needs of our students. These updates were major and contribute to our students' success and increased graduation rate.

The district was able to...

- install new inside wiring into every instructional space.
- install new telephony to meet e911 and instructional needs in every instructional space.
- install wireless access points in every instructional space.
- upgrade switches in every school to accommodate the telephony, switched and wireless networks.
- utilize bandwidth opportunities to meet the need to educators and their instructional practices.
- purchase telephony at reduced rates to offset the increased expense.

However, since the conception of E-Rate, Highline has experienced a multitude of changes that have made the program difficult to maneuver; thus, impacting the district financially and operationally:

- Funding for basic telephony – no longer funded.
- Priority 1 and Priority 2 – now Category 1 and Category 2, with different rules and services.
- Increased paperwork, oversight, audits and denial of service without details or explanations.

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,



Susan Enfield, Ed.D.  
Superintendent