

Date: August 26, 2019

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.

First, 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. With connectivity, the 2,236 teachers in the Spring Branch Independent School District (SBISD) can access instructional content to personalize instruction for the nearly 35,000 students we serve. Located in Houston, TX, SBISD uses the E-Rate program to fund a portion of district services and equipment such as the district's Internet connection, wide area network routers, and classroom wireless access points to name a few. Without E-Rate funding, SBISD would have to either seek other funding sources, or identify resources and services that must be discontinued.

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 in 2014 allowing those changes to progress and play out as intended. Changes to

Technology Services

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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 (i.e. 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. I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools and rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute that created 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 lack certainty in availability will certainly impact how districts plan to continue, or discontinue in the event funding were unreliable, their effort to build out connectivity to meet the learning needs of 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 the



continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

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,

Christina Masick

Associate Superintendent, Information Technology

CC: Dr. Jennifer Blaine, Superintendent of Schools
Kim Greer, Compliance Officer

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