



August 22, 2019

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

Dear Chairman Pai,

We are writing today in response to the Federal Communications Commission's (FCC) Public Notice (Proceeding Number 06-122) which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate.

While we wish 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, we have significant concerns that the proposed rulemaking will have significant negative consequences on this critical support. The E-Rate program provides critical discounts and funding support to assist school districts like Moore County Schools.

Moore County Schools is a rural district with an enrollment of just over 12,500 students from a wide spectrum of socio-economic backgrounds. We face challenges with broadband access in multiple areas of the district. Even with these challenges, we are recognized as a regional and state-wide leader in Digital Learning and STEM education. We are the only North Carolina school district to be awarded both the North Carolina Digital Learning Implementation and Innovation Academy Grants. North Carolina is also heavily invested in online tools for student assessment (in all grades, K-12) and online learning opportunities (through low-cost access to Instructure's Canvas Learning Management System and online Open Educational Resources through the GoOpenNC initiative).

This online learning and assessment cannot take place without reliable, high capacity Internet and WAN services to the schools (as supported via E-Rate Category 1 funds) and an up-to-date local network infrastructure in classrooms with the capacity to support student devices and teacher access (as supported via E-Rate Category 2 funds).

Our success would not have been possible without the support and success of the E-Rate program as part of the larger USF program. 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 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). As a rural district, E-Rate supports the need within our schools, and this should not be at the cost or in competition with these other USF programs meant to target other needs that exist in our County.

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 the Rural Health Care Program. E-Rate played a critical role in the rapid and significant expansion of connectivity in schools, and we are 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.

We oppose 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.

Moore County Schools has critical need for E-Rate funding support in the current and upcoming budget cycles. Category 1 support covers over \$200,000 yearly of our WAN connectivity costs. North Carolina provided matching funds of nearly \$90,000 for the remaining portion of the WAN costs. A reduction in Federal or State support for these

costs would undermine our ability to afford this critical connectivity service to our schools. This not only provides critical connections for digital learning, but is also essential to school safety and communication (through VoIP telephony and IP-based video security).

Category 2 funding has also provided over \$1,300,000 towards our school infrastructure needs. Leveraging these funds in the current E-Rate cycle will provide critical upgrades to end-of-life switches and wireless infrastructure in our schools (over 70% of which will be End-of-Life in the 2019-2020 school year). The 2014 modernization provided important predictability to the funding levels and budget cycles. This puts us in a position for proper long-term budget planning and allows us to be proper stewards of taxpayer funds. Reversion to previous funding models, and unpredictable funding levels, jeopardize the progress we have made.

In closing, we reiterate our 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.

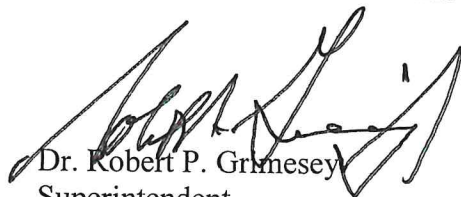
Sincerely,



Kendt Eklund
Director for Technology



Dr. Tim Locklair
Chief Officer for Academics and Student Support Services



Dr. Robert P. Grimesey
Superintendent

CC Representative Richard Hudson
Senator Thom Tillis
Senator Richard Burr
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