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

August 21, 2019

Dear 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. The membership of the Texas Association of School Administrators (TASA) appreciates 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 schools across Texas to obtain affordable telecommunications and internet access.

As you know, Texas is a very large state and many school districts rely on the E-Rate program for equitable access to connectivity and for affordable telecommunications. The proposed changes could have a negative and profound impact on our schools, students, parents, educators and communities.

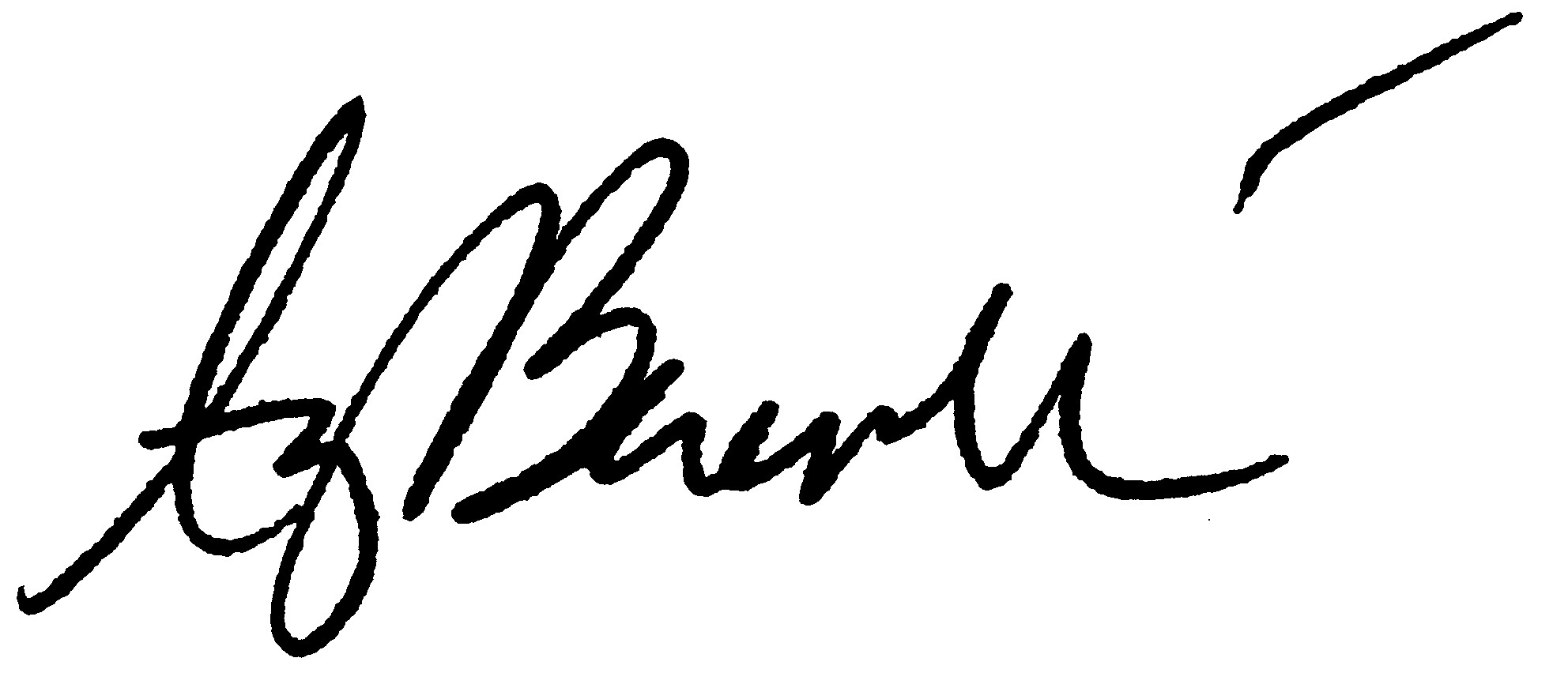
The E-Rate program, and the broader USF program, is a program succeeding in its mission and it’s a program that works. Any changes to the E-Rate program should be focused on expanding the program and ensuring the FCC remains a good steward of the changes adopted 2014. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying statute, which is to expand equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The proposed rule focuses 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 TASA is concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other and stands to undermine and threaten the great progress of E-Rate.

TASA opposes 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 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, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.

TASA appreciates the opportunity to provide feedback on this important program. Please feel free to contact me if you have any questions or need additional information.

Sincerely,



Amy Beneski

Deputy Executive Director, Governmental Relations