



JEFFERSON WEST

Unified School District 340

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A. Patton Happer, Superintendent



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

August 20, 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. 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 schools (like mine) to obtain affordable telecommunications and internet access.

USD 340 Jefferson West is a rural district in Northeast Kansas with an enrollment of approximately 845 students. E-Rate funding is crucial to the financing of our internet service and for the appropriate maintenance and improvements to our internet infrastructure system. Many of our textbooks are now digital, and we rely heavily on our network and the internet to daily provide teaching and learning opportunities for our students. Many of our students do not have access to reliable high-speed internet in their homes. Therefore we need to provide appropriate services for our students in our schools. Yearly we have students that rely on the internet to take credit recovery classes. Other students will complete online courses that enhance their learning in areas we do not have qualified teachers to provide those courses. Professional education is provided on regularly for teachers, administrators, and other staff members online throughout the year. Without support for the internet and appropriate category two expenditures, our district would struggle to provide these learning opportunities for our students and staff members. School districts must have the ability to budget for future E-Rate supported expenditures. We must be able to provide appropriate and necessary learning services for our students and staff.

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 is 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.

Jefferson West School District utilizes E-Rate funding to provide the infrastructure and internet connectivity necessary for our students to achieve the State Board and local Board goals. Those goals call for every student to be career or college-ready upon graduation from high school. Many of our classes use digital learning resources through the internet. Textbook and support materials are online and supported through online connectivity. Our infrastructure components are going on eight years old and are at the end of life. That connectivity equipment is due for replacement at a considerable cost. The support we receive from E-Rate is crucial for our district to replace that equipment. Category two support was not available for that switches and access points several years ago. We have stretched the use of current infrastructure to the limit, and now the replacement is necessary. Without E-Rate support, replacement of that equipment will place a strain our budget. That strain would harm other services and equipment needs for our students. Category two funding has assisted us in maintaining and stretching the use of our equipment for the past three to four years. Our students in grades 6-12 are all provided a computer device to access textbooks, resources, and learning experiences. Without the E-Rate support of the infrastructure, we would not be able to deliver that type of instruction to our students. Our students would fall behind their peers in being ready for post-graduate experiences and opportunities. Category two support will allow us to continue to provide the necessary educational opportunities our students require. Switches and access points are due to be replaced this year in our district. That cost is considerable, and we are planning to use category two funds along with district funding and funding through the state to replace that system. As shared, we were not able to do that several years ago. Our student programs are counting on the support we receive through E-Rate funding. Like all districts, we want to be able to continue to provide the best educational experiences we can for our students.

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,



Pat Happer, Superintendent
USD 340 Jefferson West Schools