



Superintendent of Schools

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

August 26, 2019

Dear Chairman Pai,

I am writing to share my perspective on proposed changes to the Universal Service Fund (USF) programs, including E-Rate. As an educator and the Superintendent of Schools in Frederick County, Virginia, I've seen the positive impact the E-Rate program has had in helping schools obtain affordable telecommunications and internet access. Such access is critical to preparing students to be successful in an increasingly technological world.

My school division has utilized funds from the E-rate program to help provide a reliable, high-speed computer network which is critical to educating students and preparing them to be successful in today's global economy. As a growing community that is still struggling to secure high-speed internet service in some of its more rural areas, our schools are a critical access point for students. E-Rate funds not only help support our efforts to provide high-speed internet service in all of our facilities, but also help us maintain our network and make upgrades so that we are positioned to offer the bandwidth needed to effectively and efficiently meet the needs of all of our students and staff members.

The E-Rate program, and the broader USF program, is a program succeeding in its mission. If any changes are made to the E-Rate program, they 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 expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

I am opposed to the proposed rule change which is focused on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate has played a critical role in improving connectivity in schools, and I am concerned that the proposed rule change will unnecessarily pit two important priorities—connectivity in schools and rural health care—against each other. In addition, the proposed rule change conflicts with the original legislative intent of the 1996 Telecommunications Act, which explicitly created two separate and distinct programs for schools/libraries and rural health care providers.

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Although the overwhelming majority of schools and libraries enjoy affordable connectivity, the FCC must support continuation of the E-Rate program with a focus on not just simple connectivity, but expanded connectivity with a specific focus on access to high-speed broadband.

In closing, I reiterate my district's continued support for and reliance upon the E-Rate programs it is helping us access and afford the high-speed connectivity that is critical for our students' learning

Sincerely,

A handwritten signature in cursive script, reading "David T. Sovine".

Dr. David T. Sovine
Superintendent of Schools