



To: Marlene H. Dortch, Secretary, Federal Communications Commission

From: Lori Grace, Executive Director, Texas Computer Education Association

Date: August 26, 2019

Re: Universal Service Contribution Methodology, WC Docket No. 06-122

TCEA (Texas Computer Education Association) is a global, nonprofit, member-based organization. We support the use of technology in education. Founded in 1980, TCEA has been playing a vital role in increasing technology funding and access for PreK-16 schools for nearly 40 years. Our 28,000-member association is led by a grassroots board of directors—all professional educators. TCEA's resources support educators in the field who are enhancing curriculum with digital tools. As an organization whose membership is comprised of technology teachers and technology directors, we believe strongly in the power of digital and online resources.

Over the past six years TCEA has led the charge in Texas for expanded utilization of the E-Rate program alongside other stakeholders such as EducationSuperHighway. Those efforts have led to the creation of a 25-million-dollar state matching fund by the Texas Legislature and Governor Greg Abbott which has empowered almost every school district in Texas that currently lacks high speed connectivity to obtain it. As a result of the state's effort, and the E-Rate program as a cornerstone of Governor Abbott's Classroom Connectivity Initiative, over 97% of Texas school districts have upgraded to high speed access and 99% are delivering broadband service via fiber. It is TCEA's firm belief that high-speed access is the foundation of a blended learning environment which is indispensable to any educational environment in this day and age. Without the E-Rate program, geographic and demographic factors would result in a widening digital divide in Texas schools.

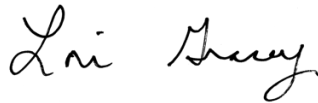
Because of the importance of E-Rate to these Texas initiatives and the advancement of education in Texas, TCEA must oppose the current rule proposals that would cap the universal service fund, and thereby cap E-Rate or combine the E-Rate program with the Rural Health Care program under a single cap.

While instituting a cap for the four different USF programs or combining the E-Rate and Rural Health Care program might superficially appear to present a viable vehicle to create cost savings or to mitigate spending growth, the fact is that each program housed within the universal service fund serves a unique need and population. The proposed cap would require the USAC to prioritize the services of the different programs. This would result in an apple to oranges comparison, requiring the USAC to determine the importance of the services delivered by each of the programs. Further, the participants of the E-rate and the other universal service fund programs must plan significantly in advance to effectively utilize the programs. The inconsistent cap might result in ample funds one year and insufficient funds the next. This inconsistency might result in major frustration of the participants and could eventually depress participation and therefore the delivery of crucial services to these populations because of the uncertainty.

Aside from the challenges creating a cap for the various programs that xshave unrelated and independent program goals, the creation of a cap would literally place into competition the education and health care of generations of Americans. To deprive populations in need the benefits of either would go against the very principles upon which our democracy was founded. At best the fluctuations in need and participation rates would lead to the need for frequent and often confusing programmatic changes to facilitate the unpredictable resource allocation. Which would again have to be determined by attempting to balance two essential needs that do not ebb and flow in relation to one another.

For these reasons TCEA would encourage the Commission to not combine the programs under one cap. Like many well intended policy proposals, TCEA believes the unintended consequences of uncertainty and the competition for resources would far outweigh the fiscal gain, if any, this rule might achieve.

Sincerely,

A handwritten signature in cursive script, reading "Lori Gracey".

Lori Gracey, Executive Director
Texas Computer Education Association