September 16, 2019

Ms. Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

**Re: Ex Parte – In the Matters of Modernizing the E-Rate Program for Schools and Libraries, WC Docket No. 13-184 and Universal Service Contribution Methodology, WC Docket No. 06-122**

Dear Ms. Dortch:

On September 16, 2019, the following representatives of the Education & Library Networks Coalition held separate meetings with Commissioner Jessica Rosenworcel and Travis Litman of her staff; Joseph Calsacione of Commissioner Brendan Carr’s Office; and Nirali Patel of Chairman Ajit Pai’s office:

* Jon Bernstein, representing AASA, The School Superintendents Organization and the International Society for Technology in Education
* Corey Williams of the National Education Association
* Chip Slaven of the National School Boards Association
* Dale McDonald of the National Catholic Educational Association
* Whitney Silverman of the National Association of Independent Schools
* Jennifer Daniels of the US Conference of Catholic Bishops
* Zach Scott of the National Association of Secondary School Principals
* Keith Krueger of the Consortium for School Networking
* Reg Leichty of the Consortium for School Networking and the State Educational Technology Directors Association
* Marijke Visser of the American Library Association

At each of these meetings, the group discussed issues related to two current rulemakings focused on the E-Rate program: the universal service cap NPRM and the Category Two Formula NPRM. On the Category 2 NPRM, the group emphasized the importance of concluding this rulemaking as soon as possible in order to afford applicants sufficient time to plan and make decisions regarding the next E-Rate application cycle. Specifically, the group endorsed: maintaining the current formula system rather than reverting to the two-in-five system; increasing the floor from $9,200 to a higher amount in order to attract more applicants from small rural schools and libraries; establishing a fixed five year cycle rather than a rotating cycle to avoid confusing applicants; and allowing district-wide budgeting to provide sufficient flexibility. Regarding the last, the group urged that private schools retain the option of applying alone. Elements of this group also endorsed adding cybersecurity and Wi-Fi on school buses to the eligible service list. Finally, the group urged the Commissioners to consider raising the $150 per student formula as anecdotal and some survey evidence suggests that this figure is inadequate. Additionally, the group also considers the library formula as inadequate and would like to see an increase from $2.30 per square foot and $5.00 per square foot for certain urban libraries as this has proved inadequate. On this last point, the group suggested that the Commission itself collect data via a nationwide independent survey to determine actual costs of Category 2 services and equipment in order to better judge the appropriate level of the Category 2 formula.

On the universal service cap NPRM, the group registered strong opposition to the proposals to cap the overall universal service fund as well as to establish a subcap for the Rural Health Care and E-Rate programs. In both cases, the group expressed concerns with E-Rate having to compete against other worthwhile universal service programs and the great uncertainty it would bring to all universal service beneficiaries regarding how much if any funding they would receive year-to-year.

Respectfully submitted,

/s/ Jon Bernstein