

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In The Matter of)	
)	
Wireline Competition Bureau Seeks Comment on)	WC Docket No. 13-184
Category Two Budgets)	

REPLY COMMENTS OF THE ACSA-CSBA FEDERAL PARTNERSHIP

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The Association of California School Administrators and California School Boards Association (the “ACSA-CSBA Federal Partnership”) respectfully submit these Reply Comments in response to the Public Notice in the above referenced proceeding.

INTRODUCTION

The Association of California School Administrators represents more than 17,000 school leaders and the California School Boards Association serves more than 5,000 locally elected school board members. The groups formed the ACSA-CSBA Federal Partnership to educate federal policymakers about California’s school districts and to work collaboratively to champion

programs and policies important to the state's students and their families, including the vitally important E-rate program.

The Universal Service Administrative Company (USAC) authorized over \$293 million of E-rate funding for California in calendar year 2016, which helped to ensure that more of the state's students are connected to the high capacity broadband services required to help them succeed.¹ On our members' behalf, we strongly encourage you to maintain the program's Category Two budgets and the initial five-year period established by the 2014 E-rate Modernization Order ("Modernization Order").²

THE BUREAU SHOULD MAINTAIN THE E-RATE PROGRAM'S CATEGORY TWO BUDGETS AND FIVE-YEAR CYCLE

The Modernization Order dramatically improved California's school connectivity speeds and connected many additional schools to the broadband required for teaching and learning. Since 2015, 2,266,637 students in 167 school districts upgraded to the 100 kbps per student minimum goal established by the 2014 E-rate Modernization Order goal. Thanks to the additional support provided by the program, 93% of California school districts, serving over 4.5 million students, now meet the Order's minimum connectivity goal. Despite this incredible progress, nearly 1.1 million students still need to be connected to the minimum recommended bandwidth goal.³

Many California school districts are counting on the Commission to follow through on the Category Two funding commitments and the five-year implementation window established by the 2014 Modernization Order. District technology investments, including broadband network infrastructure, require significant local coordination and planning. This work not only includes

¹ Universal Service Administrative Company 2016 Annual Report, p. 60.

² Modernizing the E-rate Program for Schools and Libraries, Report and Order, Adopted July 11, 2014.

³ Education Superhighway 2017 State of the States Report, California Snapshot.

complex technical actions, such as network designs, but also policy and budgetary planning among a range of school district stakeholders. Completing this local planning takes time and must also be aligned with established technology acquisition patterns. As a result, many districts plan to use their Category Two investments in year 4 and year 5 and altering the program's trajectory at this time would be devastating. We strongly urge you to follow-through on the Modernization Order's vision to provide districts with the certainty they need to complete their plans and successfully connect more students to high capacity broadband.

THE BUREAU SHOULD WORK WITH THE USAC TO MAKE ADMINISTRATIVE IMPROVEMENTS THAT WILL HELP SCHOOL DISTRICTS BETTER USE THE PROGRAM

We respectfully urge the Bureau to address several administrative challenges that are limiting districts' from maximizing the program's potential. Specifically, we support the joint comments filed by the Consortium for School Networking, Education Superhighway and Funds For Learning, which called on the Bureau to: (1) allocate Category Two budgets at the district level, rather than the building level; (2) permit applicants to apply their \$150 budget in the Funding Decision Commitment Letter, rather than limiting their Form 471s to \$150 per student; (3) eliminate the requirement to cost-allocate for multi-function equipment when ineligible features represent only a small portion of the functionality of the equipment; and (4) vastly improve the timing for approving Category Two application approvals, so that school districts receive decisions before the summer construction window. Making this administrative improvements will help California school districts close their remaining connectivity gaps, including delivering the Modernization Order's minimum broadband goals to the students that still remain on the wrong side of the digital divide.

CONCLUSION

Thank you for carefully considering our recommendations. The E-rate program remains a critically important source of support for connecting California's students to the broadband services now required to help them prepare for success after graduation. We strongly urge you to maintain the program's Category Two investments and timeline, while also making select administrative improvements, so that additional progress can be made in our communities.

ACSA-CSBA Federal Partnership

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