

Before the  
Federal Communications Commission  
Washington D.C. 20554

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

REPLY COMMENTS OF UTAH EDUCATION AND TELEHEALTH NETWORK

Utah Education and Telehealth Network (UETN) respectfully submits these reply comments in response to the Public Notice in the above referenced proceeding and those comments cited below that have been submitted into the record thus far.

BACKGROUND

Among the several roles that UETN undertakes on behalf of education, educators, and students in Utah, assisting individual E-rate applicants with their own Category Two application efforts has provided us with a unique perspective and knowledge of the issues about which the FCC seeks input.

While E-rate Modernization accomplished numerous improvements, the administration of Category Two E-rate continues to face many challenges that stem from the 2014 Modernization. In Utah 100% of students meet the current FCC broadband connectivity goals to the school building but not all students are receiving benefits from E-rate within their school buildings. At least three districts in Utah have not applied for Category Two discounts simply due to the program complexities and the long-term burdens that come with E-rate funding. We believe the following issues in this proceeding are most critical to overcoming the immediate barriers that applicants perceive.

REPLY COMMENTS

**District-Wide Approach**

We agree with the Pennsylvania Department of Education's comments<sup>1</sup> that a change to District-Wide Cat 2 Budgets would simplify the program greatly for all parties involved. Similarly, and for the many reason stated within, we agree with comments of CoSN, EducationSuperHighway, & Funds for Learning<sup>2</sup>, "...the full potential of Category Two budgets has not been realized because of three unnecessary regulatory requirements and USAC's internal staffing limitations." and that "Budgets should be set at the district and library system level, not the building level."

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<sup>1</sup> Initial Comments of the Pennsylvania Department of Education In Response to FCC Public Notice DA 17-921 Seeking Comments on the E-rate Category 2 Initiative, "2. *Simplifying the Category 2 Initiative for School/Libraries and the Administrator*"

<sup>2</sup> CoSN, EducationSuperHighway & Funds for Learning, III, 1. "This has created a situation where some Category Two funds go unused at one building while another building in the same system needs additional Category Two funds."

Additionally, applicants should be free to move Category 2 equipment among their schools without the additional burdens illuminated by commenters. Adopting a district-wide approach to Category Two solves several administrative burdens at once, including the need to return committed but undisbursed funds with individual building-level details, a task with challenges only further complicated by EPC system limitations.

Adopting a district-wide approach would also permit further simplification of the applicant experience and administrative input by eliminating the need to update, and then painstakingly validate individual school's discount data, a major factor affecting consortium application review processes. In our experience, the most inefficient process that repeats each year is the discount validation process. A great deal of time and effort is expended in an effort that rarely results in material changes to discounts from year to year.

We believe the single most effective action that the FCC could take to produce the greatest gains in both program efficiency and simplicity would be to adopt a district-wide approach to both Category Two budgets and discount calculations for all services.

### **Continue and Align Five-year Budget Cycles**

We agree with commenters that urge the continuation and "reset" of Category Two five-year budget cycles and also implore the FCC avoid a return to the pre-modernization 2/5 rule. Resetting all budgets in FY 2020, the FCC will be free to make more comprehensive changes without grandfathering applicants with unspent funds or burdening USAC with maintaining a database to track such excruciating details that only tend to add confusion.<sup>3</sup>

Thank you for your consideration.

Sincerely,

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<sup>3</sup> Initial Comments of the Pennsylvania Department of Education In Response to FCC Public Notice DA 17-921 Seeking Comments on the E-rate Category 2 Initiative, 2.,e."Align All Category 2, 5-Year Budgets"