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Before the
Federal Communications Commission
Washington DC 20554

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In the Matter of	)	
	)	
Wireline Competition Bureau Seeking	)	**WC Docket No. 13-184**
Comments on E-rate Category Two	)	
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Reply Comments from the
Wisconsin Department of Public Instruction
(Filed November 7, 2017)

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The Wisconsin Department of Public Instruction (WDPI, department) is the state's education and library agency. The department has statutory oversight for 424 public school districts and 384 public libraries. We have provided E-rate support to our state's schools and libraries since the program's inception. At the national level, our staff are active in the State E-rate Coordinators' Alliance (SECA) and the American Library Association's E-rate Task Force.

Our department has commented on many E-rate rulemaking notices back to the start of the program in 1996 and we appreciate the opportunity to submit these Reply Comments to the E-rate's Category Two (C2) Public Notice.

In general we very much support the changes made in funding for internal connections (i.e., Category Two, C2) as part of the 2014 E-rate Modernization process. Thus we support the comments filed by many organizations to continue Category Two for at least another five years beyond its 2019 expiration date and not revert back to the previous 2-in-5 year funding process.[1] In addition, we advocate for the C2

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[1] For example, see the comments filed by the State E-rate Coordinators Alliance (SECA). At p. 5 it recommends the Commission "not revert to the 2/5 method of distributing Category 2 funding to applicants" (https://ecfsapi.fcc.gov/file/1023201657942/SECA%20Initial%20Comments%20PN%20DA%2017-921%20Final.pdf). See also page 2 of the comments by the Schools, Health, and Libraries Broadband Coalition (SHLB), "SHLB thus urges the Commission to retain the current framework for category two services and give it time to reach its fullest potential"

changes below (not in priority order) that were referenced in comments initially filed by many organizations. We think these proposed changes will give our schools and libraries added flexibility in using their C2 funds and also help ensure the funds are used in the most economical and practical manner possible.

- *Give school districts and library systems C2 budget and spending authority.* Currently C2 funding is allocated at the school or library branch level and all the C2 funds going to each school or branch must be spent in those respective locations. Since technology planning is done at the district and library system level, we think it makes sense to allow districts and systems the authority to allocate C2 funding to particular schools or branch locations as needed. Comments filed by several organizations support this request. In particular the comments of the State E-rate Coordinators Alliance (SECA) highlight the many benefits of this C2 change and we encourage the Commission to closely review these comments.[2] The American Library Association (ALA) also supports this change for libraries stating, "We propose to keep the branch fund allocation process but allow the library system to move funds from one branch to another."[3] Comments by other organizations also support this change.[4]

- *Allow C2 funds to be spent over a two-year period.* Another change that could give our libraries (and schools) more flexibility is to allow C2 funds requested in any given year to be spent over a two-year period. The American Library Association (ALA) noted in its comments that doing this, "Will give applicants important spending flexibility to help, for instance, with new building projects because these projects often take well over a year to complete."[5] We think schools will also find allowing funds to be expended over two years to be advantageous.

- *Accept the Institute for Museums and Library Services square footage data for library C2 allocations.* We agree with the ALA that too many times our libraries must go through needless and onerous review of their square footage data to determine their C2 fund allocation. In some cases the

(https://ecfsapi.fcc.gov/file/102443694190/SHLB%20Comments%20on%20C2%20Budget%20PN%2010-23-17%20Final.pdf).

[2] SECA comments p. 5 with specific efficiencies described starting at p. 8.

[3] ALA comments, p.5 (https://ecfsapi.fcc.gov/file/102330495230/ALA_E-rate_Comments_10_23_2017.pdf).

[4] See detailed remarks supporting this change on pages 8-11 in the consolidated comments filed by CoSN, Education Superhighway (ESH) and Funds for Learning (FFL) (https://ecfsapi.fcc.gov/file/1024149156955/ESH%2C%20CoSN%2C%20FFL%2013-184%20NOI%20Comments%20Final.pdf).
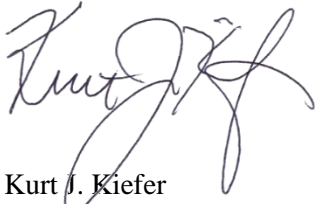
[5] ALA comments, p. 5.

application review unit of USAC (i.e., Program Integrity Assurance, PIA) demands an architectural survey of the building which can be very costly to the library. Or PIA may request detailed building blue prints that often are not available, especially for older buildings. To help streamline the program and remove this complexity and burden on libraries the Commission should take ALA's recommendation that PIA accept the library's square footage as documented in data from the Institute for Museums and Library Services.[6]

- *Allow C2 support for Wi-Fi on school buses.* SHLB filed comments on this issue stating that costs associated with installing Wi-Fi capabilities on school buses should be E-rate eligible.[7] While we acknowledge that this request may not be germane to this proceeding, never-the-less we support this request. On July 20, 2016, our department filed Reply Comments on the proposed 2017 E-rate Eligible Services List where we stated that "E-rate funding for Internet access on school busses would be a significant step toward addressing Internet access inequity in rural areas."[8] We continue to encourage the Commission to allow E-rate funds to help pay for Wi-Fi on school buses and thus we support SHLB's comment on this issue.

Finally, while not a comment related to any changes in Category Two, the Commission asks in its Public Notice how applicants have used their C2 funding. We think the detailed statistics provided in comments filed by CoSN, the Education Superhighway (ESH) and Funds for Learning (FFL) offer the Commission a good overview on how schools are using their C2 fund allocations and we encourage the Commission to review this information carefully.

Thank you very much for reviewing our Reply Comments on Category Two E-rate funding.

Sincerely,

Kurt J. Kiefer
Assistant State Superintendent
Division for Libraries and Technology
Wisconsin Department of Public Instruction

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[6] ALA comments, p. 4.
[7] SHLB comments, p. 7.
[8] Wisconsin Department of Public Instruction Reply Comments on the 2017 E-rate Eligible Services List (https://ecfsapi.fcc.gov/file/1072181862373/WDPI%20Reply%20Comments%202017%20ESL.pdf).