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November 7, 2017

Federal Communications Commission  
445 12<sup>th</sup> St SW  
Washington, D.C. 20554

RE: Wireline Competition Bureau Seeks Comment on Category Two Budgets (WC Docket No. 13-184)

Dear Sir/Madame,

I submit these comments on behalf of AASA, The School Superintendents Association. AASA is the national organization representing more than 13,000 public school superintendents, and we write in response to the Wireline Bureau's Notice Seeking Comment on Category Two Budgets. In addition to our independent comments, AASA endorsed the reply comments submitted by EdLiNC, which believes: "1) The comment record reflects ample support for maintaining Category Two budgets during this initial five-year cycle as schools and libraries are relying on the availability of these formula funds, have used or plan to use their formula allotments, and have no other local, state or federal resources to meet their Wi-Fi and internal connections needs; 2) This request for data to analyze the "sufficiency of budgets for category two services" is premature and the 47-day comment cycle is wholly inadequate to produce useful and reliable data on which to base any decisions regarding Category Two; and 3) The Bureau should initiate a review of the sufficiency of budgets for category two services only upon the completion of the current funding cycle and using an independent data collection organization."<sup>1</sup>

AASA has actively advocated for the E-Rate program since its inception in the Telecommunications Act of 1996. Our organization is focused on ensuring the program continues to successfully pursue its mission of accelerating the deployment of advanced telecommunications and information services in schools and libraries. We have been engaged in each rulemaking related to the program, and have long supported efforts to modernize and strengthen the E-Rate program. Any conversation about modernizing E-Rate must start by recognizing the unparalleled success of the E-Rate program, something we described in detail in the Summer 2013 NPRM.<sup>1</sup> In its 20 years, E-Rate has proven critical to the rapid and dramatic expansion of school and library connectivity, forever changing the face of students' classroom experiences. Schools and libraries use their E-Rate discounts to help them afford essential connectivity services and leverage additional dollars for other areas of their budgets, including instruction. The long-term success of E-Rate relies on its ability to be updated to reflect the ever-changing world of connectivity and educational technology while remaining committed to its focus on equity and program sustainability, something accomplished through the 2014 modernization and cap increase. AS a direct result of those changes, more schools and libraries are now connected to the internet, and the quality and speed of that connection more often meets that. We have fewer schools and libraries that lack the technological capacity to keep up with the mandated online formative assessments and tracking massive amounts of data through the state longitudinal data systems.

As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works and is succeeding in its mission. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended. E-Rate played a critical role is the rapid and

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<sup>1</sup> See AASA/AESA Joint Filing, Aug 27, 2013 [http://aasa.org/uploadedFiles/Policy\\_and\\_Advocacy/files/AASA%20E-Rate%20NPRM%20Comments%20081613.pdf](http://aasa.org/uploadedFiles/Policy_and_Advocacy/files/AASA%20E-Rate%20NPRM%20Comments%20081613.pdf)

significant expansion of connectivity in schools, and the 2014 modernization was a much needed update to getting more schools and libraries connected to broadband. The E-Rate's investment in Category 2 Wi-Fi and internal connections funding is extremely valuable and could not be replaced by school, district or state funds.

Demonstrating wide support for the program, in the few weeks after the FCC issued its Public Notice, more than 450 responses have documented wide-spread support for Category Two in its current form and how beneficiaries have come to rely on E-Rate and its Category Two allocations. Schools and libraries across the nation shared their stories of support, including a joint statement by school associations from Kansas, the home state of FCC Chairman Pai. It is a unified voice calling for continued support for E-Rate and Category 2.

We support the preservation of Category Two funding and the benefit it provides to recipients, as noted in SHLB's comments: "The combination of raising the cap and establishing the category two budgets has expanded the availability of Wi-Fi funding, and the nation's schools and libraries have seen tangible results. The mere fact that the E-rate program actually funded category two requests over the past two funding years, after not having disbursed any category two funding in the previous two years, shows that the Modernization Orders' framework has made a positive difference.", Comments filed by CoSN, EducationSuperHighway and Funds for Learning documented the scope of the growth supported by the Category Two expansion: prior to the E-Rate expansion, "only 11% of schools received funding for internal connections...[I]n the three years following E-rate modernization, 78% of schools received E-rate funding for internal connections." <sup>ii</sup>

This marks excellent progress just three years into the five year timeline, but more work remains, and it is imperative that the initial pilot for the Category Two budget be allowed to play out as intended, over five years. In terms of demand, the filing by CoSN, EducationSuperHighway and Funds for Learning captures that while demand has been strong (\$3.39 billion) in the first three years of the five-year cycle, a significant portion remains available and the groups "expect that the vast majority of the \$2.3 billion remaining in Category Two funds will be used in the coming two years". <sup>iii</sup> And while some data is available on the Category Two draw down to date, the data available is incomplete, and or not yet utilized their Category 2 pre-discount budget and it is important to turn the page to see what the rest of the story unveils." Compounding this reality is that demand and fiscal pressure of monthly, recurring ongoing expenses remain the "the most significant barrier to increasing connectivity, for five years running." <sup>iv</sup>

AASA remains supportive of efforts to increase access to broadband across the country. The long-term success of E-Rate relies on its ability to reflect the ever-changing world of connectivity and educational technology, remaining a program committed to its focus on equity and program sustainability, and having sustained, adequate funding that supports the programmatic changes and changing demand. We urge the FCC to remain good stewards of the E-Rate program and to allow the changes adopted in the 2014 modernization—critical policy changes that support equitable access to affordable broadband connectivity—to play out as intended.

Sincerely,



Noelle Ellerson Ng  
Associate Executive Director, Policy & Advocacy  
AASA, The School Superintendents Association

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<sup>i</sup> Filed thru ECFS November 7 2017, URL not available at time of writing

<sup>ii</sup> Comments of CoSN, EducationSuperhighway and Funds for Learning (October 23, 2017), pp. 2-3.

<sup>iii</sup> Comments of CoSN, EducationSuperhighway and Funds for Learning (October 23, 2017), pp. 2-3.

<sup>iv</sup> CoSN/AASA School Infrastructure Report (November 2017, forthcoming) <http://www.cosn.org/about/news/school-infrastructure-report-strong-gains-broadband-connectivity-challenges-persist>