



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF INFORMATION TECHNOLOGY SERVICES
Brook Conner, Chief information Officer and Assistant Superintendent

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington DC 20554

Re: MB Docket 05-311

Dear Ms. Dortch:

The Hawai'i State Department of Education respectfully submits comments on the proposed rule changes described in MB Docket 05-311. Historically, state government agencies in the State of Hawai'i have cooperated with the limited number of network providers in the state to produce the Institutional Network (or "INet"), supporting local communities and public services across the state. The INet is funded in part through monies provided by the one cable provider in the state, under the guidance of the Cable Act and as administered by the state's Department of Commerce and Consumer Affairs. Part of the INet's capacity is also provided by access to the cable provider's bandwidth solely for the use by public institutions.

The proposed rule changes in MB 05-311 would have a severe and adverse impact on this partnership, which would have a severe and adverse impact on both public and commercial services in the state. These impacts include but are not limited to the following:

- Substantially higher costs to maintaining a viable inter-island state network driven by the state's unique geography as an archipelago. Partnering with a private sector organization (i.e., the cable provider) means that both the private sector and the state share the costs to provide both public services and private, fee-based services.
- Substantially higher, perhaps prohibitive, costs to maintaining a viable intra-island state network, driven by more rural communities. The Department of Education necessarily provides schools in these rural communities, and these schools are networked through the INet. By working with our private sector partner, the rural community benefits from both public services provided by the school and by the availability of private services made easier by the INet partnership.
- Increased challenges in pursuing future public and private partnerships. Because the INet is based on the duration and robustness of a cable franchise agreement, new partnerships are more attractive and viable. This includes Federal grants, support from not-for-profit organizations, and new investment by private companies.

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- Increased challenges in managing the increasing needs of high bandwidth, cloud-based, data intensive offerings in schools. As the Hawai'i public schools seeks to prepare the state's youth for the workforce of tomorrow, it is clear that we will need to provide more and more opportunity to learn in an environment that reflects the digital nature of work.

Accordingly, the Hawai'i State Department of Education asks that the Commission reconsider the approach being considered in MB 05-311. Continuing partnerships between public and private organizations are vital to the success of the State of Hawai'i.

Please feel free to contact me at 808-586-3307 or brook_conner@hawaiidoe.org if you have any questions on this or any other matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brook Conner', with a long horizontal flourish extending to the right.

Brook Conner
Chief Information Officer
Assistant Superintendent