Charles Thacker
Farmington Municipal Schools

December 2, 2016

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: Off-Campus Use of Existing E-Rate Supported Connectivity

Farmington Municipal Schools is in support of leveraging Universal Service Funds to provide additional or improved network access to the community, specifically students of public schools and patrons of libraries, with the intent of supporting educational and research access to online resources that would otherwise be difficult to obtain.

Farmington Municipal Schools is one of hundreds of semi-rural/semi-urban municipalities that are on the edge of an urban status with acceptable penetration of high bandwidth broadband with outlying communities that have poor infrastructure, inadequate access to reasonably priced phone and telecommunications service, unacceptable cellular coverage, and a general lack of connectivity with the rest of the information driven society that our students are expected to join and succeed in.

It has been a long standing goal, one that is constantly just outside of our reach, to provide internet access to those students attending our schools who do not have connectivity. This connectivity would facilitate and support the extension of the educational processes we've started in

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our schools into the homes of our students. The combination of geographical and geological complexities, multiple governing entities (city, county, tribal), and a general lack of existing infrastructure by local and national service providers makes this goal a difficult one to meet. While we support the efforts of service providers to help provision access to remote locations they are, in general, unwilling to do so without a solid business case that results in a long term positive profit margin. This results in even higher premiums to the 'customers' which they are unable to support.

Farmington Municipal Schools is in the eighth year of a 1:1 deployment of laptops to students in grades 6-12 and the lack of adequate internet connectivity in the community has a negative impact on their educational use of the tools provided to them. Resolving this connectivity gap would in turn help to realize even greater benefit from the ubiquitous technology access they have on the school campuses.

At the same time that broadband access into the surround communities is critical there is an opportunity to provide mobile access on our school buses for those students that are spending over two hours per day being transported to and from school. Due to the distances that some of our students must travel to attend school (the FMS district is about 800 square miles), coming from remote and isolated communities, some on tribal land, having internet access using mobile hot spots provided by local and national cellular providers would be an investment utilized by the majority of our students on a daily basis. This mobile access could also be leveraged in communities if the buses were stationed in a neighborhood lacking connectivity with the mobile hot spots still operating.

All access through district owned or operated networks could continue to meet the legal requirements of safety, security and filtering by tunneling all traffic through our existing filters. This would help to focus access on educational resources while simultaneously providing a service to families that they appreciate, specifically the blocking of inappropriate and dangerous content for minors.

There is no concern, within Farmington Municipal Schools, of saturating existing connections, if those connections are leveraged by the community, as the traffic utilization patterns are complementary. Traffic on existing connections is high from internal (campus) connections during the school day and very low outside of the school day, while traffic from the community would increase during non-school hours when the existing connections are not being leveraged heavily by campus connections.

As a final point, and one that is critical to this discussion, it must be clearly understood that the money supporting the Universal Services Fund is not the service providers' money, it is not the government's money, it is in fact the community's money. Every individual and business that pays a bill to any telecommunications company is paying approximately 17.4% (4th quarter of 2016 contribution factor) of their applicable charges on their bill. You are welcome to confirm this on your own personal bill. The service providers are not paying this to the USF out of their own profits, they are passing the costs along to the customers. These are the same customers we are trying to provide services to and who deserve to benefit from their own investment in the Universal Services Fund.

Sincerely yours,

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