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September 30, 2014

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Modernizing the E-Rate Program for Schools and Libraries, WC Docket No. 13-184.

Hillsborough County Public Schools (HCPS) appreciates this opportunity to provide comments to the Commission regarding sections 274/278 of the "Report and Order and Further Notice of Proposed Rulemaking". HCPS, serves the city of Tampa and the surrounding communities, is the 8th largest school district in the nation, with over 203,500 students in 279 schools.

HCPS recommends that existing multi-year contracts for services, that remain eligible, be grandfathered and exempted from the new rule. These contracts were entered into in accordance with the E-rate program and statutory requirements at the time the contract were executed. At a minimum, existing multi-year contracts for five or fewer years need to be grandfathered and exempted from any amendments or modifications.

Re-bidding contracts is not always advantageous to the E-rate program or to the districts. In our existing multi-year contract, the district locked in favorable pricing for bandwidth services that are below the current prevailing rates for a three-year term with two additional one year renewal options.

Districts will be forced to conduct another bid process and add costs and efforts associated with terminating the contract if it becomes necessary to cancel existing contracts due to the new rule.

Our district staff annually reviews pricing to determine whether competitive opportunities are available in order to reduce the cost for both the E-rate program and our district. Our district recommends accepting waiver requests from entities that can demonstrate the cost effectiveness of their existing multi-year contracts with terms longer than five years in order to stretch the impact of limited program funds.

Sincerely,

