

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

September 30, 2014

In the Matter of:

Modernizing the E-Rate Program for Schools) WC Docket No. 13-184
And Libraries Public Notice)

Comments of AASA: The School Superintendents Association

Introduction: On behalf of *AASA: The School Superintendents Association*, representing more than 10,000 public school superintendents I write in response to the FCC's Public Notice (PN): Modernizing the E-Rate Program for Schools and Libraries. We applaud the FCC's continued focus on modernizing the schools and libraries (E-Rate) program and offer these reply comments:

AASA Reply Comments to the July Order: The positions and priorities outlined in our comments remain the same as filed earlier this month¹:

- We urge the FCC to do no harm to program beneficiaries (schools and libraries) currently participating in the program.
- We strongly support a permanent increase in the E-Rate program's annual funding level. Raising the program cap would support not only the original goals of connectivity, but also facilitate expansion of the program's focus to broadband and streamlining the application process, as well as support the changes adopted in the July 2014 order. Permanent, adequate funding ensures equity in program benefit, providing connectivity to the schools and classrooms of a much larger portion of applicants.
- We support the development of and access to robust data and evidence that document both unmet and emerging funding, as well as technology and connectivity needs.
- AASA opposes pilots and carve out projects. Any pilot project (including use of E-Rate dollars limited to supporting fiber build out) siphons limited dollars away from the historically oversubscribed E-Rate program. Any incursion on the E-rate program – whether it be from a new service, a new class of applicants, or a new program—would significantly destabilize the program.
- We support technology, funding and entity neutrality within E-Rate. The E-Rate program has historically remained neutral as it relates to technology, empowering local decision making as it relates to the technology best suited to entity needs and it has historically made funding available for all eligible entities (school or library).
- In addition to seeking clarification on the new definition of rural, we support the SECA-submitted request for reconsideration. We agree with SECA's assertion that "The definition of urban should only include urbanized areas and not urban clusters to ensure that schools and libraries in sparsely populated rural areas are not improperly designated as urban..."². We are concerned with the

¹ AASA Comments as filed with the FCC via ECFS (<http://apps.fcc.gov/ecfs/document/view?id=7522712560>). Sept. 15, 2014)

² SECA Petition for Reconsideration or Clarification Regarding Report and Order Released on July 23, 2014
<http://apps.fcc.gov/ecfs/document/view?id=7522899638>

potential for formerly rural areas to lose the E-Rate rural discount due simply to a change in definition, even when their community remains rural. We urge the FCC to ensure that the definition of rural as it relates to schools and libraries is consistent with that used in other federal education and rural education programs.

Data Collection: Echoing the sentiment of our colleagues at NTCA, we believe that ‘...to most cost effectively deploy E-rate resources the Commission should focus on “solving” the “problem” that each individual school or library has, whether that be one of availability or affordability. NTCA thus encourages the Commission to expand its data gathering beyond those schools and libraries referenced in the EducationSuperHighway comments, *i.e.*, to all schools and libraries across the nation. *A more comprehensive data collection is critical to account for the unique needs of the thousands of schools, libraries, and school districts and library systems serving rural and urban areas of all sizes.*³ (emphasis added)

Broad Support for Adequate, Sustained Funding: Beyond AASA’s long-standing advocacy around raising the E-Rate funding cap, we want to point to the consistent messaging within comments related to this order to date as it relates to the need for additional funding, including comments by the Urban Libraries Coalition, Cisco, Alliance for Excellent Education, EdLiNC, the National League of Cities, and more.⁴ Further, AASA was pleased to join more than 70 national organizations and businesses—representing E-Rate beneficiaries, stakeholders, service providers, civil rights groups, educators, parents, and more—delivering a strong unified request for “...a permanent increase in funding for the E-Rate program...”⁵.

Conclusion: AASA remains supportive of efforts to increase access to broadband across the country. We urge the FCC to move forward to ensure permanent additional funding for E-Rate with the speed and commitment with which they advanced programmatic changes earlier this calendar year. 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, 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.

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³ Reply Comments of NTCA-The Rural Broadband Association <http://apps.fcc.gov/ecfs/document/view?id=7522900751>

⁴ Urban Libraries Coalition (<http://apps.fcc.gov/ecfs/document/view?id=7522705706>, Sept. 15, 2014);

Cisco (<http://apps.fcc.gov/ecfs/document/view?id=7522646616>, Sept. 2014)

Alliance for Excellent Education (<http://apps.fcc.gov/ecfs/document/view?id=7522611029>, Sept. 15, 2014)

EdLiNC (<http://apps.fcc.gov/ecfs/document/view?id=7522674859>, Sept. 15, 2014)

National League of Cities (<http://apps.fcc.gov/ecfs/document/view?id=752227939>, Sept. 12, 2014)

⁵ As filed by Corey Williams (NEA) on September 30, 2104. URL on FCC ECFS not yet available.