

October 21, 2014

Tintic School District
att. Tom Nedreberg
55 East Main St.
Eureka, UT 84628-0291
Entity Number 142859

To Whom It May Concern:

I wanted to write and give my comments about the FCC's July E-Rate Modernization Order and the change to the Urban/Rural classification methodology. I would like to express my strong opposition to the reclassification of many school districts in Utah from Rural to Urban. The following are some general objections that concern all districts in Utah:

- The proposed rules preceding the July Order did not suggest that communities as small as 2,500 in population would be considered as urban.
- Subsequent clarifications to the July Order made substantive changes to the Order that were not considered nor voted upon by the full Commission.
- With no further changes, in Utah 20 out of 25 of our rural districts lose their Rural designation (a 10% decrease in E-rate discounts for most).
- It is more reasonable to consider communities of 25,000 or more as urban, not those with populations as low as 2,500.
- Considering the phase out of E-rate discounts for voice services, small rural districts should not be additionally penalized by the unreasonable urban classification of these obviously rural areas.

Specifically for my district the reclassification from Rural to Urban makes no sense. The Tintic School District has one community of 600 inhabitants. The second community is a collection of ranches with no services for 90 miles and about 150 inhabitants. There are four schools in the two communities that are separated by 130 miles with a total of 255 students. The largest school has 145 students, grades 7-12, followed by a K-6 school of 90 students. The two smallest schools are both 1 teacher schools of K-6 and 7-12 with about 15 students each.

Please reconsider the classification of the districts in Utah that have been changed from Rural to Urban and specifically please strongly reconsider the Tintic School District's classification back to Rural because that is the type of district it truly is.



Tom Nedreberg
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