

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Modernizing the E-rate	)	WC Docket No. 13-184
Program for Schools and Libraries	)	

**COMMENTS OF THE  
NATIONAL CABLE & TELECOMMUNICATIONS ASSOCIATION**

The National Cable & Telecommunications Association (NCTA) applauds the recent E-rate program reforms adopted by the Commission, particularly the recognition of the importance of funding broadband connectivity throughout school classrooms and library buildings, and the Commission’s efforts to ease the administrative burdens of the program.<sup>1</sup> With respect to administrative burdens, we agree with petitioners that the Commission should reconsider two limited issues: the extension of the E-rate record retention period from five to ten years, and the need to cost allocate voice-related services.

**I. A TEN-YEAR RECORD RETENTION PERIOD IMPOSES SIGNIFICANT BURDENS ON E-RATE PROGRAM PARTICIPANTS**

We agree with USTelecom that increasing the E-rate document retention period from five to ten years significantly increases the administrative burden and cost of compliance for all program participants.<sup>2</sup> As USTelecom notes, the record in the proceeding does not support the Commission’s assertion that “electronic storage of documents can dramatically reduce [document retention] costs.”<sup>3</sup> Indeed, the Commission has recognized the costly nature of

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<sup>1</sup> *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Report and Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870 (July 23, 2014) (*2014 E-rate Order*).

<sup>2</sup> Petition for Reconsideration of the United States Telecommunications Association, WC Docket No. 13-184, 2 (Sept. 18, 2014) (USTelecom Petition).

<sup>3</sup> USTelecom Petition at 8-10; *2014 E-rate Order*, 29 FCC Rcd at 8974-75.

retaining electronic records in its rural call completion rulemaking proceeding.<sup>4</sup> The additional costs of requiring ten years of document storage will burden all E-rate participants and could dissuade some schools, libraries, or providers from participating in the program. For this reason the Commission should reconsider its decision to extend the document retention period from five to ten years.

## **II. THE COMMISSION SHOULD RECONSIDER ITS COST ALLOCATION REQUIREMENT FOR VOICE-RELATED SERVICES**

As Verizon notes in its petition for reconsideration, the process of attempting to allocate costs associated with voice-related service components that are no longer funded by E-rate and the remaining voice service will be extremely complex and unlikely to yield any significant savings to the program.<sup>5</sup> For this reason, the Commission should reconsider its decision to eliminate support for voice-related services and should instead phase out this support on the same timeframe established for voice support.

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<sup>4</sup> *Rural Call Completion*, WC Docket No. 13-39, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154, 16182-84, ¶¶ 61-64 (2013) (In this case the Commission adopted a six-month document retention period).

<sup>5</sup> Verizon Petition for Reconsideration and/or Clarification, WC Docket No. 13-184, 5-6 (Sept. 18, 2014).

## **CONCLUSION**

The Commission should continue its efforts to ease the administrative burdens associated with participation in the E-rate program. Reconsideration of the extended ten-year document retention and complex voice-related service cost allocation requirements would help to achieve that goal.

Respectfully submitted,

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