



**Southwest
Region
School
District**

Ms. Marlene H. Dortch,
Secretary Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
2550 M Street, NW
Washington, DC 20037

October 17, 2014

P.O. Box 90
574 Kenny Wren Road
Dillingham, AK 99576

(907) 842-5287 • Phone
(907) 842-5428 • Fax

Re: Notice of Ex Parte In the Matter of Modernizing the E-rate Program
for Schools and Libraries, WC Docket No. 13-184

Dear Ms. Dortch:

I am writing to offer support from Southwest Region Schools (SWRS) for
the letter dated October 17, 2014 from Christopher Nierman of General
Communication, Inc. (GCI).

On page two of that letter, Christopher points out that a "tiny fraction of
the overall E-Rate budget" has historically gone to Distance
Learning/Video Conferencing Services. I would like to add to that
statement that while the impact on E-Rate may be "tiny," the impact on
SWRS of removing these services from the Eligible Services Lists (ESL) is
significant. The immediate impact to SWRS's budget is an increase of
\$136,000 annually. SWRS does not have the capacity to absorb this
increase in costs without cutting services elsewhere (which usually
means teachers when figures are this high). This would eliminate
Distance Learning and Video Conferencing Services available to students
and staff.

Distance Learning and Video Conferencing Services are vital to the
operations of SWRS in that there is no road system connecting our
schools. Electronic field trips, student council meetings, curriculum team
meetings, staff development meetings, leadership team meetings,
etcetera, are all held by Distance Learning/Video Conferencing in SWRS.

Distance Learning and Video Conferencing Services represent our most
cost-effective means of face-to-face communication and collaboration.
Without these services, many of our essential activities would be cost
prohibitive, if not impossible. Not only are the costs of air travel, lodging,
and meals very expensive for real face-to-face meetings, much of the year
air travel is dubious at best and dangerous at worst given our adverse
and unsteady weather conditions.

Aleknagik

Clark's Point

Ekwok

Koliganek

Manokotak

New Stuyahok

Portage Creek

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Commissioner Mike O’Rielly recently experienced the impact of Distance Learning and Video Conferencing Services-as well as the logistics of rural travel-in SWRS firsthand when he visited our Manokotak “Nunaniq” School in September 2014. SWRS would encourage the Wireline Competition Bureau to seek Commissioner O’Rielly’s impressions based on his visit.

As Christopher Nierman points out in his letter, SWRS relies on the “end-to-end QoS built into GCI’s network core” to make Distance Learning and Video Conferencing Services possible. Over the years SWRS has tried many solutions less expensive (and/or free) than our current services, but they all proved to be less cost-effective in that none of them proved to work reliably, if at all, given our small bandwidth, high-latency, and excessive jitter inherent in the delivery of data transmission to our region of rural Alaska.

The current level of Distance Learning/Video Conferencing Services in SWRS represents our best efforts to meet our needs in a cost-effective manner. We ask that the Wireline Competition Bureau retain Distance Learning and Video Conferencing Services as supported services in Category One of the Eligible Services List.

Respectfully,

Lester E. Parks
Technology Coordinator / Authorized E-Rate Signatory
Southwest Region Schools
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907-842-5287

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