

**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 Commonwealth of Pennsylvania  
on the Petition to Reconsider the E-rate Definition of Urban**

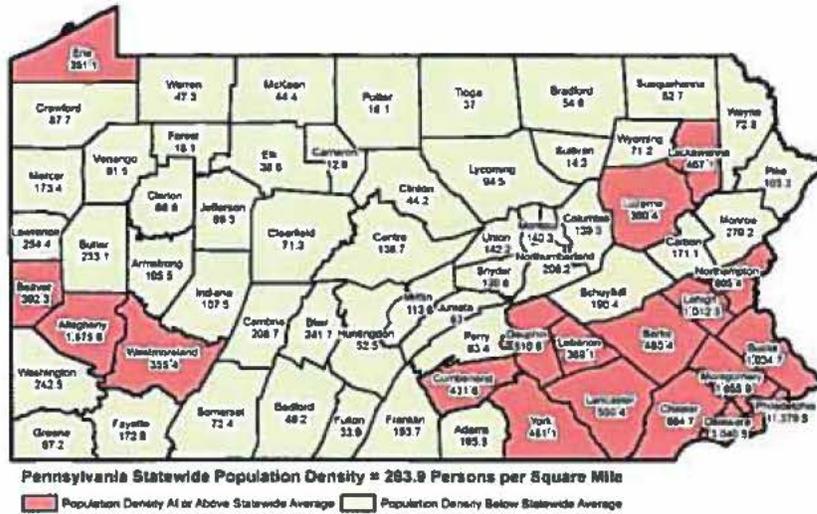
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The Commonwealth of Pennsylvania hereby submits comments to support the Petitions for Reconsideration filed by several parties related to the adopted definition of rural areas for the E-rate program. As a state with a significant rural population, and that twice filed Petitions with the FCC seeking to have the previous definition more accurately depict the rural county demographics in Pennsylvania, we are keenly aware that a definition that does not encompass truly rural areas is a barrier to broadband build-out and which must be addressed at the onset.

The definition of urban that was ultimately adopted by the Commission as an Erratum to the July 23, 2014 E-rate Modernization Order includes 'urban clusters' which have populations of between 2,500 and 50,000. Using this expanded definition of urban from what was originally adopted in the July 2014 Order, 109 Pennsylvania census areas are now misclassified as urban and will not be able to receive the 10% E-rate rural additive discount.

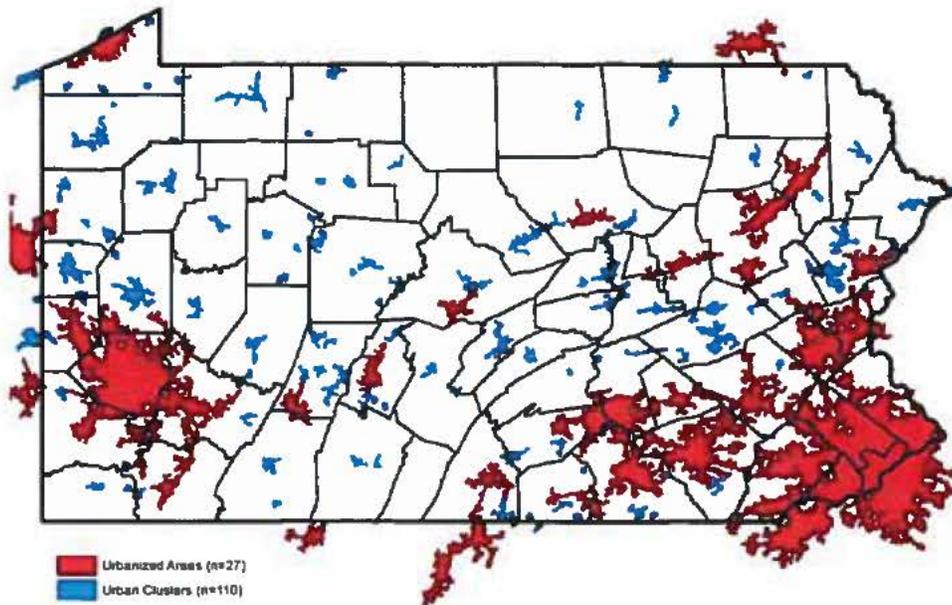
Nearly all of the census areas classified as urban clusters are sparsely populated towns in rural areas of the state. The following is a map of Pennsylvania, using 2010 census data, showing rural counties in PA using population density data. The yellow areas in this map accurately depict the rural, sparsely populated portions of the state.

*Rural/Urban Counties of Pennsylvania Using 2010 Census Data*



Now consider the following map that separately identifies Pennsylvania's urbanized areas and urban clusters. The urbanized areas are denoted in red, while the urban clusters are denoted in blue.

*Urban Clusters and Urbanized Areas in Pennsylvania Using 2010 Census Data*



The urban clusters are nearly all located in rural areas of the state. A comparison of the maps shows that most of the urban clusters (in blue) are situated in rural counties (yellow) in the first map.

By including these small towns in the definition of urban, the new methodology will penalize the very schools and libraries that the Commission very much wants to see faster broadband adoption because their costs will jump 10% overnight.

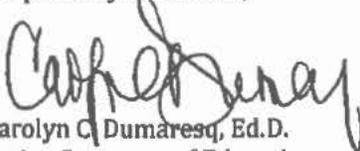
For example, in 2014, the DuBois Area School District, located in Clearfield County, signed a five-year contract to install and lease a gigabit fiber network, bringing a 1 GB connection to each of their 10 schools. The pre-discount cost is \$11,000 per month. Their E-rate discount was 73% last year, requiring the District to pay \$2970/month for its non-discounted share or \$35,640 per year. Using the new simple average discount calculations and new definition of urban, the District's broadband discount rate will drop to 60% in FY 2015, requiring them to pay a total of \$52,800 for its non-discounted share from their local budget. In other words, to continue to pay for this network – for which they have no ability to now terminate the contract – they will be required to pay an additional \$17,160/year.

Dubois Area School District is just a single example of the unintended consequence of the new rural definition, for which there are dozens of others that are similarly situated. The Commonwealth does not believe it was the intention of the FCC to penalize rural districts where broadband costs are most expensive, yet this has been the result.

Therefore, the Commonwealth of Pennsylvania respectfully requests that the FCC change the current definition of urban to exclude all urban clusters. This change should be made as soon as possible so school districts can accurately budget their non-discount costs for existing contracts as well as determine if they can afford to enter into new broadband contracts moving forward.

The inclusion of urban clusters in the definition of urban is not consistent with the Commission's broadband adoption and affordability goals, particularly for schools and libraries in rural America and will certainly impede our efforts to bring affordable broadband adoption to Pennsylvania's schools and libraries.

Respectfully submitted,



Carolyn C. Dumaresq, Ed.D.  
Acting Secretary of Education

Attachment: List of PA Urbanized Area and Urban Cluster Census Tracts

Census Tract Name	Population	Urbanized Area or Urban Cluster
Cumberland, MD--WV--PA	31	Urban Cluster
Belvidere, NJ--PA	62	Urban Cluster
Weirton--Steubenville, WV--OH--PA	302	Urban Cluster
Milford, NJ--PA	388	Urban Cluster
Binghamton, NY--PA	2,422	Urban Cluster
Emmitsburg, MD--PA	2,429	Urban Cluster
Lake Meade, PA	2,563	Urban Cluster
East Prospect, PA	2,575	Urban Cluster
Susquehanna Depot, PA	2,585	Urban Cluster
Meyersdale, PA	2,596	Urban Cluster
Cambridge Springs, PA	2,602	Urban Cluster
New Wilmington, PA	2,638	Urban Cluster
Newport, PA	2,657	Urban Cluster
Emporium, PA	2,677	Urban Cluster
Martinsburg, PA	2,733	Urban Cluster
Curwensville, PA	2,751	Urban Cluster
Patton, PA	2,798	Urban Cluster
Moscow, PA	2,811	Urban Cluster
Reynoldsville, PA	2,839	Urban Cluster
Brockway, PA	2,856	Urban Cluster
Youngsville, PA	2,921	Urban Cluster
Lykens, PA	2,973	Urban Cluster
Treasure Lake, PA	2,982	Urban Cluster
Everett, PA	3,220	Urban Cluster
Ligonier, PA	3,314	Urban Cluster
Burgettstown, PA	3,380	Urban Cluster
Union City, PA	3,381	Urban Cluster
Tunkhannock, PA	3,426	Urban Cluster
East Liverpool, OH--WV--PA	3,448	Urban Cluster
Pine Grove, PA	3,462	Urban Cluster
Elverson, PA	3,697	Urban Cluster
Millsboro, PA	3,728	Urban Cluster
Kane, PA	3,770	Urban Cluster
Mercer, PA	3,838	Urban Cluster
Mount Union, PA	3,859	Urban Cluster
Nanty-Glo, PA	3,918	Urban Cluster
Houtzdale, PA	4,081	Urban Cluster
Mansfield, PA	4,152	Urban Cluster
Fairdale, PA	4,166	Urban Cluster
Mifflinburg, PA	4,363	Urban Cluster
Mifflintown, PA	4,372	Urban Cluster
Ridgway, PA	4,410	Urban Cluster
Mount Holly Springs, PA	4,416	Urban Cluster
Bonneauville, PA	4,427	Urban Cluster
Masontown, PA	4,443	Urban Cluster
Millersburg, PA	4,540	Urban Cluster

Census Tract Name	Population	Urbanized Area or Urban Cluster
Brookville, PA	4,542	Urban Cluster
Albion, PA	4,574	Urban Cluster
Towanda, PA	4,588	Urban Cluster
Williamstown, PA	4,596	Urban Cluster
Stewartstown, PA	4,663	Urban Cluster
Bedford, PA	4,693	Urban Cluster
Ebensburg, PA	4,914	Urban Cluster
Jim Thorpe, PA	5,594	Urban Cluster
Orwigsburg, PA	5,645	Urban Cluster
Port Jervis, NY--PA	5,665	Urban Cluster
Titusville, PA	5,732	Urban Cluster
Honesdale, PA	5,849	Urban Cluster
Saw Creek, PA	5,880	Urban Cluster
Littlestown, PA	6,302	Urban Cluster
Punxsutawney, PA	6,394	Urban Cluster
Montgomery, PA	6,453	Urban Cluster
North East, PA	6,456	Urban Cluster
Northern Cambria, PA	6,544	Urban Cluster
Corry, PA	6,571	Urban Cluster
Slippery Rock, PA	6,716	Urban Cluster
Pocono Woodland Lakes, PA	7,020	Urban Cluster
Blairsville, PA	7,060	Urban Cluster
Roaring Spring, PA	7,130	Urban Cluster
Quarryville, PA	7,233	Urban Cluster
Portage, PA	7,247	Urban Cluster
Edinboro, PA	7,263	Urban Cluster
Tyrone, PA	7,622	Urban Cluster
Ashland, PA	7,820	Urban Cluster
Waynesburg, PA	8,665	Urban Cluster
Clarion, PA	9,373	Urban Cluster
Muncy, PA	9,495	Urban Cluster
Hagerstown, MD--WV--PA	9,503	Urban Cluster
Franklin (Venango County), PA	9,581	Urban Cluster
St. Marys, PA	9,585	Urban Cluster
Jersey Shore, PA	9,606	Urban Cluster
Kutztown, PA	10,002	Urban Cluster
Philipsburg, PA	10,015	Urban Cluster
Greenville, PA	10,771	Urban Cluster
Clearfield, PA	10,903	Urban Cluster
Cresson, PA	11,106	Urban Cluster
Huntingdon, PA	11,385	Urban Cluster
Grove City, PA	11,886	Urban Cluster
DuBois, PA	11,898	Urban Cluster
Bradford, PA--NY	12,073	Urban Cluster
Somerset, PA	12,583	Urban Cluster
Sayre--Waverly, PA--NY	12,837	Urban Cluster

Census Tract Name	Population	Urbanized Area or Urban Cluster
Bellefonte, PA	12,888	Urban Cluster
Ellwood City, PA	13,006	Urban Cluster
Kittanning--Ford City, PA	14,072	Urban Cluster
New Freedom--Shrewsbury, PA--MD	14,138	Urban Cluster
Tamaqua, PA	15,200	Urban Cluster
Oil City, PA	15,296	Urban Cluster
Warren, PA	15,420	Urban Cluster
Shippensburg, PA	17,008	Urban Cluster
Lock Haven, PA	17,741	Urban Cluster
Shenandoah--Mahanoy City--Frackville, PA	19,009	Urban Cluster
Lewistown, PA	22,181	Urban Cluster
Meadville, PA	23,887	Urban Cluster
Mount Pocono--Emerald Lakes, PA	24,216	Urban Cluster
Waynesboro, PA--MD	24,719	Urban Cluster
Sierra View--Indian Mountain Lake, PA	28,347	Urban Cluster
Indiana, PA	28,807	Urban Cluster
Sunbury, PA	29,541	Urban Cluster
Shamokin--Mount Carmel, PA	30,185	Urban Cluster
Milton--Lewisburg, PA	30,806	Urban Cluster
Youngstown, OH--PA	39,477	Urban Cluster
Butler, PA	40,352	Urban Cluster
New Castle, PA	41,907	Urban Cluster
Pottsville, PA	43,247	Urban Cluster
Chambersburg, PA	50,887	Urbanized Area
Uniontown--Connellsville, PA	51,370	Urbanized Area
Bloomsburg--Berwick, PA	53,618	Urbanized Area
East Stroudsburg, PA--NJ	54,067	Urbanized Area
Williamsport, PA	56,142	Urbanized Area
Hazleton, PA	56,827	Urbanized Area
Monessen--California, PA	66,086	Urbanized Area
Hanover, PA	66,301	Urbanized Area
Johnstown, PA	69,014	Urbanized Area
Lebanon, PA	77,086	Urbanized Area
Altoona, PA	79,930	Urbanized Area
State College, PA	87,454	Urbanized Area
Pottstown, PA	107,682	Urbanized Area
Erie, PA	196,611	Urbanized Area
York, PA	232,045	Urbanized Area
Reading, PA	266,254	Urbanized Area
Scranton, PA	381,502	Urbanized Area
Lancaster, PA	402,004	Urbanized Area
Harrisburg, PA	444,474	Urbanized Area
Allentown, PA--NJ	632,208	Urbanized Area
Pittsburgh, PA	1,733,853	Urbanized Area
Philadelphia, PA--NJ--DE--MD	3,760,387	Urbanized Area