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

Re: Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184

Dear Ms. Dortch:

On November 13, 2014, Christianna Barnhart of Charter Communications, Jordan Goldstein of Comcast Corporation, Jennifer Prime of Cox Enterprises, Inc., and Steve Morris and I from the National Cable & Telecommunications Association (NCTA), discussed potential revisions to the E-rate program rules with Lisa Hone, Carol Matthey, Trent Harkrader, Sean Conway, Bryan Boyle, Kate Dumouchel, and Patrick Halley of the Wireline Competition Bureau, and Jonathan Chambers, chief of the Office of Strategic Planning and Policy Analysis. Specifically, we expressed the cable industry's support for the E-rate program, including the recent changes that will fund Wi-Fi connectivity throughout schools and libraries.

We also discussed ways to ensure that schools and libraries in rural areas where only one or no provider responds to requests for service can meet the FCC's broadband connectivity goals. With respect to allowing schools and libraries to use E-rate funds to construct their own facilities, the Commission should adopt the same safeguards that are currently used in the universal service rural healthcare program, including requiring a demonstration that this option is the most cost-effective method. In making this determination, the Commission must ensure that applicants conduct an apples-to-apples comparison of the costs of self-provisioning versus purchasing provider-offered services, taking into account all of the costs associated with activating, maintaining and managing high-speed broadband connections. In addition, the Commission should require schools and libraries that seek funding for self-provisioning also to include a request for bids on provider-offered services for comparison purposes.

Respectfully submitted,

/s/ **Jennifer K. McKee**
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cc: L. Hone
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