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Federal Communications Commission
445 12th Street SW
Washington, DC 20554

November 25, 2014

Dear Sir/Madame,

I am writing today in response to FCC Chairman Tom Wheeler's recently announced proposal to raise the E-Rate funding cap by $1.5 billion. The E-Rate program currently represents the only source of federal funding aimed at educational technology and is critical in providing discounts to assist schools (like mine) to obtain affordable telecommunications and internet access. As the Executive Director for the Region 8 Education Service Center of Northeast Indiana, I strongly support the infusion of the additional funding, and urge you to do the same.

Our service center here in Northeast Indiana represents public, private, and parochial schools and seeks to maximize their resources through collaboration and cooperative efforts. E-rate funding is a very important aspect of our organization as well as the 35 public school districts we work for. As education funding has been cut and funds diverted away from public education, resources such as E-rate are more important than ever to schools in our area.

To raise the cap of the E-Rate program by $1.5 billion, the Universal Service Fund fee will increase by 16 cents per month per account. 16 additional cents per month—less than half a penny per day—totals to an additional $1.92 per year, approximately the cost of a cup of coffee. This proposal is both reasonable and justified, asking contributors to forgo one cup of coffee over the course of a year to ensure that our nation's schools and libraries are connected to the internet in a way that supports 21st century learning and prepares them for post-secondary opportunity.

No one questions that it is time to ensure that our libraries and schools are connected with the quality of connectivity that is sufficient and scalable for today's ever-growing connectivity needs. In less than twenty years since Congress established the program, E-Rate played a critical role in transforming levels of connectivity from less than one-quarter of schools and libraries to nearly all connected today. The E-Rate program's work is not done: Achieving the laudable broadband goals adopted by the Commission in July will require additional investment. The biggest obstacle the E-Rate program faces, even with the recent changes, remains the strain of increasing demand for E-Rate-supported services and persistently low funding.

The single most effective step the FCC can take to bolster E-Rate's current and future success is to ensure that the program's funding is adequate to support, in a sustainable manner, the program's changes and goals as adopted in July. Chairman Wheeler's proposal does just that, representing a deliberate effort to expand educational opportunities for our nation's students. By focusing on high-capacity broadband connections to the internet (particularly those in rural communities) and providing sustained, additional funding to the E-Rate program, the modernized E-Rate will ensure the nation's schools—including mine—are able to keep pace with ever increasing connectivity needs.

I also commend the FCC for revising the definition of 'rural' as used within the E-Rate program. In July, the FCC adopted a new definition of the 'rural'. I am deeply concerned with the new definition and urge the FCC to modify the definition of rural as used in the E-Rate program. In particular, I am opposed to the use of 'urban clusters' to define rural without a population threshold, as the term inappropriately captures more than 1,500 rural schools and public libraries in the broad category of 'urban cluster,' denying them the additional rural E-rate discount for which they should qualify. I am concerned that the FCC has adopted a specific definition of rural for that will come with unintended consequences. The adopted definition works counter to the stated goal of helping close the connectivity gap, by potentially exacerbating the gap that exists between rural and non-rural areas. Loss of the critical 'rural' discount widens the affordability gap that many rural schools and libraries struggle with daily. I urge the FCC to modify its definition so that a population of 25,000 or greater be considered urban. This proposal recognizes the FCC's interest in modernizing the E-Rate rural definition in a census-centric manner while allowing schools and libraries in urban clusters with populations below 25,000 to be considered rural for the purposes of the E-Rate program. This specific proposal was recently submitted in a joint filing of 22 national organizations representing a broad cross-cut of E-Rate stakeholders, a bold, strong show of unanimity.[1]

Thank you for considering my response as you move forward with your decision on the E-Rate program and its funding. I applaud Chairman Wheeler and the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program.

Sincerely,

Joshua O. Wenning

[1] 22 National Organizations Urge FCC to Modernize Definition of Rural in E-Rate (Response to Petition to Reconsider, PDF)