Empowering Education Through Technology

July 30, 2015

VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Communication
Lifeline and Link Up Reform and Modernization -- WC Docket No. 11-42
Telecommunications Carriers Eligible for Universal Support -- WC Docket no. 09-197
Connect America Fund -- WC Docket No. 10-90
Modernizing the E-rate Program for Schools and Libraries -- WC Docket No. 13-184
Schools and Libraries Universal Service Support Mechanism -- CC Docket No. 02-6

Dear Ms. Dortch:

On July 14, 2015, representatives from Houston Independent School District (Texas) ("HISD") and San Diego Unified School District (California) ("SDUSD")[1] met via teleconference with Jonathan Chambers, Chief of the Office of Strategic Planning & Policy Analysis and Lisa Hone, Associate Bureau Chief of the Wireline Competition Bureau (WCB) to discuss the importance of funding and/or rule changes to allow for anytime/anywhere Internet Access in bridging the digital divide that still exists in many households throughout our country.

Both HISD and SDUSD have storied histories with successful 1:1 computing initiatives. HISD implemented its PowerUp initiative in 2013 by providing laptops to some high school students. After three years, the program has been progressively expanded to include all high school students. SDUSD implemented its Learning on the Go (LOGO) initiative way back in 2009 and expanded it when they were awarded one of the E-Rate EDU Pilot grants in 2011. The data gleaned from these programs is irrefutable. Students who are able to access the Internet outside of the constraints of a school day are more engaged, miss less school, and are more successful in their learning endeavors and more willing to continue their learning when they are able to use the power of the Internet to set a path and pace that suits them individually.

[1] Participants on the call:
Lenny Schad, CTIO, HISD, Pat Collins, Manager IT, HISD, Scott Gilhousen, Director of Infrastructure, HISD, Beatriz Arnilla, Director of Ed Tech, HISD, Dan Stoneman, CIO, SDUSD, Jeremy Recktenwald, Director of Infrastructure, SDUSD, Kerry McGonigal, Managing Partner, Hyperion Partners, Kim Friends, VP of E-Rate Compliance, CSM and Cathy Benham, Director of Pre-Commitment Operations, CSM.

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A significant part of the discussion centered on the existing E-Rate rule prohibiting E-Rate funded Internet access from being accessed from an ineligible location, such as a student's home. This prohibition has made it nearly impossible for an E-Rate applicant to think 'outside the box' or in this case, outside the campus boundaries. Yes, we understand that there is a mechanism to cost-allocate (reduce) the amount of E-Rate funding received if there is off-campus use involved but let's be honest; an applicant cannot afford to take any more hits to its bottom line simply to provide Internet access using Internet that is sitting idle at nights and on weekends. Currently, the E-Rate program will support 100% of the Internet access being delivered to an eligible school campus, including that portion of the service that is not being used at night or on weekends but it will not support any 'ineligible' use of that Internet, even if there are no other measurable impacts. The group on the call today was very receptive to the idea of presenting compelling data demonstrating how effective the 'idle' Internet could be if and when the necessary E-Rate rule change occurs.

Another topic of discussion was in relation to the Lifeline's NPRM "Homework Gap" paragraphs 17-26 discussing how data collected through the E-Rate program could potentially work in tandem with any Lifeline reform to help close that "Homework Gap." There was some reference to the Beaufort County Public Schools filing from June 30, 2015 in relation to the idea that data collected through the E-Rate program could help target reformed Lifeline dollars toward broadband in the home where there is a specifically identified need from the school district's perspective. Support for this idea is particularly attractive when one considers that currently, Lifeline support consists of a $9.25 per month/per HOUSEHOLD subsidy that can be used to supplement voice communications, whether wired or wireless. Since the current USF subsidy is tied to household (not individual) participation, there is a genuine concern that at least some of the 40 million households who qualify for the Lifeline subsidy will choose wireless voice service over broadband when presented with a choice of one or the other, therefore negating any progress toward closing the "Homework Gap" when school aged children live in those homes.

Both HISD and SDUSD appreciated the opportunity to speak with FCC staff and plan to participate in the Lifeline reform proceeding to offer their support for the planned reforms.

Any questions regarding this filing or its contents should be directed to Kim Friends, E-Rate Consultant for both HISD and SDUSD at kfriends@csmcentral.com.

Regards,

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