

**Duval County Public Schools**  
**BEN 127591**

- **Contact information including name, address, telephone number, and email address of the person who can discuss the appeal with USAC in detail;**

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- **Provide documentation of USAC's decision (i.e. copy of USAC's decision letter);**

FDCL attached Denying Funding – 12/17/15 - Cost Effective Review

- **Include supporting documentation such as forms and previous correspondence;**

Attached PDFs

- **Identify a problem and the reason for its appeal;**

Funding was denied based on "Ineligible Services/Products" citing FCC Order 14-99, Individual data plans and air cards are ineligible unless applicants can demonstrate either that installing a wireless local area network is not physically possible or that individual data plans are the most cost-effective option.

Reason for appeal – Today while some WLAN - Wi-Fi (One Hot-Spot) exists in schools it is not sufficient to allow the user to perform the responsibilities of their job duties by accessing the Duval County Public Schools support resources providing that functionality of:

***Field Techs supporting Student Computer Repair***

A long range project is funded to allow Wi-Fi deployment in each school but due to costs it will not be functional until in future years. Aircards are ***the only way*** a user can link to resources at this time until Mobile WLAN - Wi-Fi is implemented.

Duval County Public Schools converted its APN (A Private Network) to 4G speeds thru Services provided by the State of Florida for Aircards via Competitive E-Rate contract DMS-1011-008A.

Use of aircards allow Duval County Public Schools users to produce results now while Long Range Wi-Fi capabilities are being implemented in future years.

The FCC Order 14-99 did not make Aircards Ineligible as stated on Page 63 151.

**151. Data plans and air cards for mobile devices will continue to be eligible for E-rate support only in instances when the school or library seeking support demonstrates that individual data plans are the most cost-effective option for providing internal broadband access for portable mobile devices at schools and libraries.**

Duval County Public Schools contends that as stated in FCC 14-99 that deployment of WLAN is not deployed in on-campus use that the Aircard is a stop gap solutions to provide this limited group of users Internal Broadband access for use in their laptops in the mobility situations. Cost Effective since it is the only available solution today while Multiyear Mobile Broadband (Wi-Fi) is being deployed. The use of the Aircards give the users data **access to certain educational and informational materials**. NO Voice capability is included in the Aircard being utilized.

Aircard Service is being obtained from the State of Florida via E-Rate contract which has 3 vendor solutions. Duval County Public Schools selected the lowest cost vendor – at&t @ \$34.99 Documentation attached showing State of Florida Contract, Vendors, Price.

USAC delivers the message that Aircards never qualify if Mobile Broadband WLAN - Wi-Fi can be deployed.

Duval County provided this information repeatedly that WLAN – Wi-Fi was not available.

1. 471 during the In-window filing.
2. Lack of Wi-Fi capability Information again provided in PIA review 6/5/15
3. Lack of Wi-Fi capability Information again provided in Cost Effective Review 12/7/15

Each time it was not considered because USAC wants you to use Wi-Fi as first solution which we explained was not available to the user because it was not deployed in the 158 schools.

A typical Wi-Fi deployment costs in the Range of \$75,000 to \$100,000 in hardware costs & Infrastructure per school - so the 158 schools is a large capital investment.

A Long range project is underway but it will take several years to deploy in 158 schools with the current budget constraints. FCC understands the need for Mobile Broadband deployment but the late timing of available funding will not allow Mobile Broadband capabilities with one budget year.

**Example of user needing bandwidth:**

***Field Techs access PDFs and manufacturer sites required to Repair and make Student***

computers To allow them to have access to certain educational and informational materials

The expensive cost of Wireless Network Electronics and hardware have limited the deployment of Wi-Fi in schools which would provide sufficient bandwidth to link to the internal resources.

- **Explain precisely the relief sought through this appeal.**

Funding consideration be given since users do not have access to existing Mobile Broadband WLAN - Wi-Fi in these locations to access DCPS resources. Wi-Fi does not exist in the schools to allow its use instead of Aircards. Aircards are stop gap solution for limited Subset of users who are Mobile – not assigned in a classroom which has LAN/WAN wired Ethernet access exists.

In accordance with FCC 14-99 250. Section 54.179 - Duval County Public Schools files this appeal with USAC prior to filing a FCC Appeal which it will do if USAC does not approve this request for reconsideration of funding for this FRN.