In the Matter of	)	
	)	
Comprehensive Review of Universal Service Fund	)	WC Docket No. 05-195
Management, Administration, and Oversight	)	
	)	CC Docket No. 96-45
Federal-State Joint Board on Universal Service	)	
	)	CC Docket No. 02-6
Schools and Libraries Universal Service Support Mechanism		

State Educational Technology Directors Association (SETDA) Reply Comments to the Federal Communication Commission's Notice of Proposed Rulemaking on the Universal Service Fund

The State Educational Technology Directors Association would like to iterate its support for the E-rate program in these Reply Comments for the Comprehensive Review of Universal Service Fund: Management, Administration, and Oversight, Notice of Proposed Rulemaking. Our organization and its members wholly support and depend upon the Universal Service Fund, particularly the E-Rate program in its entirety. This critical program provides access and opportunities to millions of learners and teachers across the United States. It is an essential underpinning of education programs including educational technology and data reporting nationwide.

In the NPRM, the FCC requests guidance on how technology planning requirements can be harmonized with those of the United States Department of Education (USDoE). In paragraph 59 of the 5th Report and Order, the FCC codified that plans approved for the USDoE's Enhancing Education Through Technology (EETT) program are acceptable for E-rate with one additional qualification. The plan must also include documentation "that the applicant is aware of and will be able to secure the financial resources it will need to achieve its technology aims, including technology training, software, and other elements outside the coverage of the Commission's support program."

SETDA suggests that the technology plan is not the best place to obtain this financial information. The technology planning committee is usually made up of teachers, administrators, and community members. The plan is being written up to four years in advance of its expiration. Thus, necessarily, the long-range plan is developed at a high level with much of the technical and financial details left to be finalized later, including any necessary adjustments. The decision about what will actually be funded must be determined each year and often an administrative decision based on funding levels and budget requirements. Thus, assurances of financial support within the long-range technology plan are not as timely or authoritative as the same assurances which are already required on the Item 25 certification of the Form 471. SETDA suggests that the Item 25 certification is made at a time when the commitment for money and sufficient resources can more reliably be made and is signed by an authorized person. Therefore, SETDA suggests that while the technology plan should provide for sufficient

resources, compliance should be certified on the Form 471 rather than the long-range educational technology plan.

SETDA believes that technology planning is extremely important and that the federal requirements should be as clear as possible to local schools and districts. Different sets of technology planning rules from multiple federal and state agencies distracts from the intended goal of planning. We recommend that the FCC defer to the USDoE's technology planning requirements based on the No Child Left Behind Act. As pointed out in the comments of the State E-Rate Coordinators Alliance (SECA), the FCC's rules and USDoE's rules are very similar. We, therefore, recommend that if a plan is accepted for NCLB's Enhancing Education Through Technology Program, it also be accepted by E-rate.