

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Schools and Libraries Universal Service
Support Mechanism

CC Docket No. 02-6

**COMMENTS ON A PETITION BY THE STATE E-RATE COORDINATORS ALLIANCE FOR
CLARIFICATION AND/OR WAIVER OF E-RATE RULES CONCERNING TECHNOLOGY
PLAN CREATION AND APPROVAL UNDER THE SCHOOLS AND LIBRARIES UNIVERSAL
SERVICE SUPPORT MECHANISM**

I am responding to the Commission's request for comment¹ concerning SECA's request for clarification of technology plan rules for the E-Rate program.² I am the president of a consulting firm which manages the E-Rate process for over 90 applicants, including public school districts and charter schools, public libraries and private schools. I also provide training to applicants at a variety of conferences.

The clarifications suggested by SECA should be adopted in full. The current technology plan creation and approval requirements are difficult for many applicants to understand. In addition, applicants are forced to juggle two timelines for development and approval of technology plans in order to meet both E-Rate and state requirements.

The Commission should also clarify the requirements for applicants whose technology plans are not on a July-June cycle. For some applicants, it is more appropriate to have to have the technology plan on a January – December cycle. These applicants should be allowed to receive discounts at the start the funding year if their plan for the second half of the funding year has not been approved, as long as it has been written. Of course, these applicants would have to receive approval of a technology plan covering the second half of the funding year by December in order to continuing receiving funding through the end of the funding year.

Respectfully submitted,



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¹ DA 07-1846

² *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Petition for Clarification and/or Waiver of E-rate Rules Concerning Technology Plan Creation and Approval under the Schools and Libraries Universal Service Support Mechanism, filed Feb. 21, 2007.