

Formal opening  
Description of entity and effect on Alaska of program

Statement of previous filings on NPRMs  
History of AK tech planning

Request for FCC removal from process

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

_____	)	
In the Matter of	)	
	)	
Schools and Libraries Universal Service	)	CC Docket No. 02-6
Support Mechanism	)	
_____	)	

**COMMENTS OF THE ALASKA DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT AND THE ALASKA STATE LIBRARY CONCERNING THE PETITION FOR THE CLARIFICATION AND/OR WAIVER OF E-RATE RULES CONCERNING TECHNOLOGY PLAN CREATION AND APPROVAL UNDER THE SCHOOLS AND LIBRARIES UNIVERSAL SERVICE SUPPORT MECHANISM FILED BY SECA**

The Alaska Department of Education and Early Development and the Alaska State Library (EED/ASL) have greatly appreciated the opportunity for their schools and libraries to benefit from the past 10 years of E-Rate funding. Alaskan applicants have participated in the program since the beginning in nearly total numbers and have improved telecommunications and Internet services incalculably, particularly in our very remote and isolated locations. Many of our applicant organizations are extremely small and without resources to manage the exigencies of this complicated program without the help of the state agencies. The degree of successful funding commitments to these applicants is a testimony to their willingness to follow E-Rate rules and regulations.

As the program began 10 years ago, the requirement for a technology plan to ensure educational purposes for requested services seemed to EED/ASL an excellent fit for their own standards for planning and accountability for the schools and libraries of the state. As early as the 2<sup>nd</sup> year of the program, EED/ASL personnel worked to integrate the rubric then used for state required comprehensive plans with the E-Rate requirements. State education officials determined that an integrated plan dealing with all aspects of educational goals would be preferable to several discrete plans aiming at different programs.

As years progressed, No Child Left Behind and EETT planning strictures changed, EED personnel adapted the approval rubric several times, always aiming for a single plan covering all educational goals which could actually be used as a working plan and guide for districts and libraries. E-Rate requirements either mirrored, overlapped, or were added as needed. The approval process which the state used sufficed to meet all these federal and E-Rate needs as well as fitting the schedules of the schools and libraries who must yearly produce enormous amounts of reportage, documentation, studies, verifications, and other documents for local, state and national programs.

When the Administrator of the E-Rate program began the emphasis on the very early creation date of technology plans, EED/ASL began training and information seminars to help applicants understand the necessity of having a plan written 8 to 10 months before their current plan expired, 6 to 8 months before the budget for the applicable year was approved, 2 to 3 months before budget preparation activities for that year began, and in very many case, several months before funding for the current year's services were announced. Needless to say, applicants were extremely skeptical about the entire process. Plans became, instead of practical and usable documents guiding activities for learning and evaluation, studies in probability and best guesses. EED/ASL personnel became adept at explaining the updating and resubmission process as actual data became available to district and library personnel and their plans became more concrete.

Most telecommunications services delivered to schools and libraries today are either duplicates of or upgrades of current services. Given the educational purpose of the planning process, there is no reason that an expiring plan with 8 to 10 more months of approval remaining could not be used as the justification for continuing those services until a new plan is approved before the June 30 end of the old plan. Allowing the current plan to serve as the "creation" or "draft" of the new plan for E-Rate purposes is not only practical for timing and workload purposes, it also serves the educational purpose of a plan even better than a jerry-rigged plan put together simply to meet requirements for E-Rate and meet the "before the 470" timeline.

There obviously are some technology initiatives which are new, not appearing in the currently approved plan. Asking for evidence of prior planning for these types of new services could be done, but would require a new, and probably more complex, type of review from SLD. A simpler requirement might be for any applicant which will be including a service on their projected 470 that has never been mentioned in a technology plan to file a plan addendum which contains all 5 of the E-Rate plan requirements with their approving agency. This addendum could be considered with their current plan as fulfilling the requirement that services be listed in a tech plan before a 470 filing.

The State of Alaska agencies, EED/ASL, have frequently commented on NPRMs as requested by the commission in the matter of technology plans. We have consistently urged the commission to allow states to control their own tech planning processes and we maintain that stance.

Respectfully,

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