

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Schools and Libraries Universal Service Support Mechanism)	CC Docket No. 02-6
)	
State E-Rate Coordinators' Alliance (SECA) Petition Concerning Technology Plan Creation Requirements)	Public Notice DA 07-1846
)	

**REPLY COMMENTS SUBMITTED BY
THE ILLINOIS STATE BOARD OF EDUCATION
AND THE ILLINOIS CENTURY NETWORK
IN RESPONSE TO
THE STATE E-RATE COORDINATORS' ALLIANCE (SECA) PETITION FOR
CLARIFICATION AND/OR WAIVER OF E-RATE RULES CONCERNING
TECHNOLOGY PLAN CREATION AND APPROVAL UNDER THE SCHOOLS AND
LIBRARIES UNIVERSAL SUPPORT MECHANISM**

The Illinois State Board of Education (ISBE) and the Illinois Century Network (ICN) appreciate this opportunity to reply to initial comments relating to the SECA petition for clarification and/or waiver of E-Rate rules concerning technology plan creation and approval under the Schools and Libraries Universal Support Mechanism.

The ISBE and the ICN agree with comments made by E-Rate Central emphasizing the problematic nature of the current Universal Service Administrative Company (USAC) focus on technology plan "creation or written" dates as opposed to traditional approval requirements. We concur that applicants have been provided with less than a consistent definition and detailed

guidance identifying the specific elements that comprise a created technology plan.

The mechanism to track and record “creation or written” dates is difficult for many states to develop or maintain given the uncertainty of documentation requirements and an abbreviated timeline relative to the filing of a Form 470.

The ISBE and ICN agree with comments made by the Colorado Department of Education identifying the difficulty in verifying “creation or written” dates relative to various revisions of technology plans as they continue to evolve. We further agree with the Colorado response highlighting the misplaced application of current “creation or written” date requirements upon funding year 2005 applicants.

We respectfully disagree with the comment made by the Wisconsin Department of Public Instruction suggesting the elimination of the technology plan requirement. The ISBE and ICN recognize the need for clear direction and well designed application and integration of technology into the curriculum. We instead agree with the state of Missouri’s comment that the fundamental need for an approved technology plan under current E-Rate rules is valid and should be enforced.

The ISBE and the ICN agree with comments made by the Berrien County Intermediate School District pointing out that consortium lead entities should be

able to rely on the technology plan status of individual members when filing a Form 470. We further agree with the opinion that USAC review of consortium leads and their member's technology plan status should be limited to the Letters of Agency (LOA) technology plan certification. We also see merit in reconsideration of technology plan requirements as they apply to consortium procurement processes due to the unrealistic restrictions they impose as outlined by SECA and other commenting parties addressing this point.

We support specific comments made by the American Library Association among others that reinforce the notion that technology planning and monitoring should ultimately be managed at the state level. The majority of states have a well-organized and efficient technology plan approval process available to applicants, increasing the likelihood of success with regard to technology integration.

We support the prevailing thoughts of many of the initial comments that urge the commission to accept existing approved technology plans as sufficient to meet pre-Form 470 requirements. We also share the opinion that any perceived deficiencies in approved technology plans should be correctable and should not result in a denial of funding.

The ISBE and the ICN believe, as many commenting suggest, that working from an existing approved technology plan better insures a solid pre-bidding document. This evolving, or living document, if you will has greater potential to

infuse technology tools into the curriculum and more accurately reflect long term and forward thinking goals and strategies inherent to the E-Rate program.

The Illinois State Board of Education and the Illinois Century Network are great proponents of E-Rate and we recognize its positive impact on students throughout our state. We fully support the State E-Rate Coordinators' Alliance (SECA) petition for clarification and/or waiver of rules pertaining to technology plan creation and approval.

We sincerely appreciate this opportunity to provide feedback and participate in the process of refining and improving this worthwhile program.

Respectfully submitted,

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