

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

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

**COMMENTS SUBMITTED BY THE
LOS ANGELES UNIFIED SCHOOL DISTRICT IN RESPONSE TO THE
PROPOSED FY 2008 E-RATE ELIGIBLE SERVICES LIST
(FCC 07-130)**

I. INTRODUCTION

These comments are filed in response to the FCC's request regarding the FY2008 proposed Eligible Service List ("ESL") for the Universal Service Funding for Schools and Libraries program ("SLD"), otherwise referred to as the E-rate program. From the outset, the Los Angeles Unified School District ("LAUSD") wants to thank the Federal Communications Commission ("FCC" or "Commission") for its ongoing commitment to the Universal Service Program for Schools and Libraries ("E-Rate Program"). The E-rate Program has successfully spurred connectivity across our District, especially for schools in economically-disadvantaged areas. The program's focus needs to remain with these schools, assisting them to complete their network infrastructure and allow on-going maintenance in support of their educational activities. We appreciate this opportunity to comment on possible changes and respectfully request that the SLD consider our following suggestions.

II. PRIORITY OF BASIC MAINTENANCE SERVICES

Thanks in large part to ten years of E-Rate funding, many more school districts now have computers in their classrooms, giving them greater access to instructional programs and

network enterprise resources such as the District's Integrated Student Information System ("ISIS") and business-driven tools such as the enterprise resource planning ("ERP") system Business Tools for Schools ("BTS"). Schools have internet access available in most classrooms so that teachers can complete real time student assessments, develop daily lesson plans for students or collaborate on professional development opportunities. Schools and school districts are adding telephone lines into main switchboards, providing necessary access to more teaching professionals in the schools. Telephones for teachers in the classroom are now an important safety necessity, ensuring that 911 emergency dial out can occur. The challenge is to meet the ever-increasing demand for delivery of information to over a million users at more than 1,200 sites.

The demand for access at LAUSD has increased significantly in the last six years. The demands are evidenced by the following growth:

- The average number of emails sent daily has gone from 25,000 in January 2004 to 450,000 in February 2006. A 1,800% growth.
- The number of E-rate network devices has grown from 100,000 to 150,000 since 2001. The District is close to 90% capacity of its Internet bandwidth. Based on the current growth rate on current bandwidth, it is projected that the bandwidth will need to be doubled in two years.
- The average number of web site hits has grown from 1.9 million a week in January 2004 to just over 30 million a week in February 2006. A 1,500 % percent growth in just two years.

Under the FCC Form 471 Instructions dated November 2004, applicants are required to use items 23A – 23E to list out recurring charges (monthly charges) for the services. The instructions state that the services must be delivered between July 1 and June 30 for the funding year. The following considerations are noted below:

- Most large-city districts receive basic maintenance services on a monthly basis. Most contracts for these services are structured as a fixed-rate that includes a recurring monthly cost that would cover all eligible network devices being maintained at a specific school site.
- Maintenance services are delivered on a regular, monthly billing cycle whereby the payment frequency is established in the applicant’s contract. It is worthwhile to note the similar comparisons noted below:

Figure 1. Comparison of Basic Maintenance versus Telecom Services

	Basic Maintenance Services (Priority 2)	Telecom - Digital Transmission Services (Priority 1))
SLD Eligibility Provision	Ensure the necessary and continued operation of eligible internal connection components at eligible locations	Provides the data transmission links that connect eligible locations using voice, video, or data
Delivery of Services	June 1 – July 30 RECURRING	June 1 – July 30 RECURRING
Recipient of Schools	All eligible school sites, shared service	All eligible school sites; shared service
Billing Frequency	Monthly, not One-time	Monthly, not One-time

- Standard maintenance contracts are multi-year contracts whereby the performance time is July 1 through June 30; and the term of renewal is

executed on a twelve month cycle not a fifteen month cycle consistent with services delivered under priority two contracts.

- Schools are required to list all schools on the block 4 when services are delivered to all schools jointly e.g. telecommunication and basic maintenance services.
- The Program Integrity Assurance (“PIA”) process typically will begin with the review of the telecom and internet access applications first; and subsequently internal connection services. Due to the time lag of when basic maintenance is awarded, large city districts are faced with budgeting concerns regarding the level of service that their budget can support when delivering maintenance services to school sites. In a typical scenario, funding is awarded for basic maintenance 8-9 months after the start of the funding year, while services have to begin on July 1, forcing most schools to re-assess the level of support that can be provided to schools.
- With factors such as obsolescence and /or age of the system impacting the ability to access instructional and central business applications, repair and upkeep of the system become critical. Keeping rates of high failure down due to extensive usage are key considerations with over 1,200 sites and over one millions users.

We recommend that basic maintenance services are afforded the same Priority 1 designation as is currently afforded to telecommunication and internet access services. The premise of

priority one services is that without the data link connecting multiple points using any available technology¹, the digital transmission connecting the eligible schools to the services are necessary to support the transmission of data; without the maintenance on the eligible device, transmission would be negligible if the devices continues to be in a state of repair.

III. ELIGIBILITY OF FAILOVER AND REDUNDANCY

The SLD position that the components are only eligible if used as an² essential element in the transmission of information within the school is inconsistent within the reality of how large city districts interpret this definition. The wording in the ESL draft describes the following:

“Components that are installed in standby mode, redundant, not active and online, or otherwise not an essential element in the transmission of information within the school.”

In a typical network configuration, it is not uncommon for schools to build-in failover capability in their network design for the most critical network components. Specifically, if one of the critical components fails, the whole school system would lose IT services. Within an enterprise-wide network, it is critical that the secondary component is able to continue transmitting information if the primary fails in order avoid lengthy outages and service disruption.

In most cases, the eligibility issue will center around one router and one backbone switch configuration in any given school network. In this instance, the PIA reviewer will request that the District cost allocate the redundant component that is considered “ineligible”. Typically,

¹ Schools and Libraries' Eligible Services List for Funding Year 2008 page 2 (Digital Transmission Services)

² Schools and Libraries' Eligible Services List for Funding Year 2008 page 14 - 15 (Other Miscellaneous Ineligible Components)

school districts will use this component in their network design standard as a basic element necessary for service continuity. Meaning, if the primary component fails, a secondary component will be able to continue providing services to schools. The District has experienced at least five failures of the main switching engines in the past four months.

Therefore, we are recommending that the SLD reconsider its position regarding the cost allocation of redundant components (failover) and that consideration be given to Districts that have large network infrastructure to maintain.

IV. CONCLUSIONS AND RECOMMENDATIONS

We appreciate the opportunity to comment on these important issues and strive to provide the perspective of a large school-district that is an active participant in the program, among these as a representative and advocate for over 1200 sites, and as an administrator supporting the FCC and USAC/SLD in these important efforts.

Among the important goals of our comments are these:

- The program's primary focus needs to remain with applicants, assisting them to complete their network infrastructure and allow on-going infrastructure maintenance in support of their educational goals.
- Consideration of changing the priority of how basic maintenance is funded.
- The eligibility of the fail-over with redundancy built-in the network design is an essential component for transmission of information within the school.

Please don't hesitate to call on us for any assistance in these important matters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tracy Okumura". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tracy Okumura
Administrative Services Manager
Los Angeles Unified School District