Proposed Rulemaking on Services Eligible for E-Rate Funding
CC Docket No. 02-6

October 3, 2008

As the FCC considers making changes to the list of services eligible for E-Rate funding, please accept the following comments from the Indianapolis Public Schools (IPS) in favor of federal E-rate support for wireless internet access service applications.

IPS is the largest school district in the State of Indiana, serving 34,000 students and 6000 teachers and educational support staff. As a participant in the E-rate Program, we strongly support the inclusion of additional wireless services in the Eligible Services List (ESL). We specifically endorse the position taken by Sprint and others in this docket regarding the addition and clarification of the Eligible Services List as it pertains to Wireless Internet Access service applications and Internet access in the educational environment.

IPS faces tremendous challenges in educating our urban student population. One of the ways we are working to lower our dropout rate and increase our graduation rate is to equip our students with appropriate tools to enable a rich, technology-embedded infrastructure. By doing so, we enable teachers to engage students in a teaching and learning model that is more akin to their 21st century digital experience. Particularly for students who struggle, we try to break down the classroom walls with initiatives designed to allow learning to occur 24/7 rather than within the traditional 7- period day. Additional time for students to master content is a major variable for school improvement. In this model, we ultimately double the learning time and enable it to occur from anywhere.

Ultimately, IPS would be positioned to provide all high school students with laptop computers and access to the Internet. Laptops without wireless internet access, however, would not represent an appropriate return on our investment without also providing support for our students' 24/7 access to the internet. IPS's application for E-rate support for the cost of providing wireless air cards for high school students is currently pending before the FCC. .

The education process has evolved, as has the use of the Internet in providing educational resources to our schools and libraries. No longer can the idea of an “internet pipe” to a school or library be considered the predominate method of accessing the internet for multiple applications that are “integral, immediate and proximate” to the education of the student. As originally provisioned, an ISP would use a network to connect students, teachers and administrators to the Internet via computers or terminals that were large, heavy devices that were not mobile without significant effort by the user. As networks and technology have developed, this has given way to laptop computers, which increased mobility to a degree but still required a significant effort to manage the connection for both Internet, power and network access.

With the advent of the Personal Digital Assistant (PDA) and more recently with other devices such as the Apple iPhone, connection to the Internet has moved beyond a fixed location to a point where they are integrated into everyday life, including and enhancing the interaction between the student, teacher and the administration of the schools and libraries. It is the movement from a fixed location for internet access to an everyday, ever changing location for internet access and for supporting applications that needs to be considered as you continue to assess and enhance the ESL so that the services covered by the E-rate remain relevant to schools' educational needs.

IPS received a U. S. Department of Education Challenge grant that enabled it to pilot a 1:1 Laptop project with 2500 middle school students from 2001 through 2006. The evaluation results of this "Tech Know Build Project" produced some interesting results. Providing students with portable devices was shown to not only increase students' motivation and engagement, but also was directly correlated with increased attendance. There were also gains in parental involvement. By grade 8, the students in this pilot program demonstrated mastery of 21st Century Skills. These students tended to write more often, work in groups effectively and model good oral communication skills. Gains in high stakes testing were evidenced in Math; these gains are attributed to these resources as well as other intervention strategies.

In Sprint's submission in this docket, it advocated making sure that the following applications and services are included on the ESL:

- Student/Teacher/Patron Safety
- School Bus Tracking
- Classroom Attendance
- Assessments of Classroom Effectiveness

IPS believes each of these activities serves as an "educational" opportunity and should be included in Eligible Services List along with services that support a 24/7 instructional environment and virtual school environments for regular and homebound students.

We also share Sprint's view that Text Messaging should be specifically identified and included among the eligible services on the ESL, and we agree that the FCC should clarify any ambiguity on this point. The draft ESL includes e-mail as an eligible service. Text messaging is an extension of this same service, but delivered via a different end user device, the PDA versus a computer. It would be consistent to consider both services as providing the same educational value and expressly include both in the ESL.

IPS thanks you for the opportunity to comment on these important matters before the Commission and welcomes the opportunity for follow-up.

Sincerely,

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