

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In The Matter Of)	
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Schools and Libraries Universal)	
Support Mechanism)	CC Docket No. 02-6
)	

To: The Commission

REPLY COMMENTS OF THE SAN DIEGO UNIFIED SCHOOL DISTRICT

The San Diego Unified School District (“SDUSD”) hereby submits these Reply Comments in support of the filings by AT&T, Inc. (“AT&T”), Sprint Nextel Corporation (“Sprint”), and Verizon and Verizon Wireless (collectively, “Verizon), which urge that the E-rate Eligible Services List for funding year 2010 clarify that equipment for wireless internet access, including 3G (EV-DO or WCDMA/HSPA) connection cards and USB modems, 3G wireless routers, and other wireless Internet remote access devices, as well as wireless data plans and applications, are all eligible for E-rate support.¹

I. Summary

SDUSD respectfully files these reply comments to reiterate that wireless Internet equipment, access, and applications are all increasingly important tools for schools to implement innovative educational programs and to improve primary and secondary education in many ways, and, therefore, to urge the Commission to rule that wireless Internet equipment, access, and applications are all be deemed eligible for E-rate support. The Commission itself has recently recognized that broadband Internet access, often on small, easy-to-use devices, is

¹ See AT&T Comments at Page 3; Sprint Nextel Comments at Pages 1-2; Verizon Comments at Pages 2 to 4.

rapidly transforming the way Americans learn. See FCC Report on a Rural Broadband Strategy, May 22, 2009 at Page 7. Moreover, the Commission has also recently written that “(h)igh speed ubiquitous broadband can help to restore America’s economic wello-being and open the doors of opportunity for more Americans, no matter who they are, where they live, or the particular circumstances of their lives.” Notice of Inquiry, A National Broadband Plan for Our Future, FCC 09-31, released April 8, 2009, at Page 2. The entire nation is buying and relying on wireless Internet equipment, access, and applications at an ever-increasing rate. Schools should not be forced to rely only on fixed, wireline technology. The E-rate program will not fulfill its mission if it does not provide support for wireless

For a large urban school district, such as SDUSD, wireless Internet equipment, access, and applications are very important tools for improving learning and will only become more important in the future. Just as most American businesses can no longer rely exclusively on fixed, wireline internet access or equipment, schools cannot do so either. Our teachers and students are mobile, even during the school day. Wireless Internet equipment, access, and applications allow learning to take place no matter where our students or teachers are located. But, E-rate support is essential because school budgets are so limited, and the pace of innovation in the areas of wireless Internet equipment and educational applications is so rapid. For all of these reasons, SDUSD agrees with AT&T, Sprint, and Verizon that wireless Internet equipment, access, and applications should all be deemed eligible for E-rate support.

II. Background

The San Diego Unified School District serves over 132,000 students. It is the second largest school district in California and the eighth largest urban school district in the United States. The student population is extremely diverse, representing more than 15 ethnic groups and

over 60 languages and dialects. The district consists of more than 221 educational facilities, with 14,555 full-time equivalent staff positions representing more than 15,800 employees. The district's facilities include 118 elementary schools, 24 middle schools, 29 high schools, 35 charter schools, and 15 atypical or alternative schools. In particular, SDUSD is very active in using technology for education. For example, in 2006, SDUSD received a \$2.24 million grant to integrate technology into its middle school science curriculum.

III. Wireless Internet Equipment, Access, & Applications Should Be Deemed Eligible for E-rate Support

SDUSD agrees with AT&T, Sprint, and Verizon that wireless Internet equipment, access, and applications should be deemed eligible for E-rate support. As Sprint explained in its comments, schools, like American society in general, are turning more and more to mobile technologies. Sprint Comments at Page 2. Wireless Internet access and applications allow our teachers to reach our students, and vice versa, no matter where they are during the day or night and will substantially enhance learning. As Verizon stated, many schools across the country are purchasing wireless laptops and notebooks (or other wireless devices) to enhance learning initiatives and to provide access to "anytime, anywhere" educational applications. Verizon Comments at Page 3. Finally, as AT&T noted, schools must have access to an ever evolving set of telecommunications services and equipment to support their 21st Century educational missions. AT&T Comments at Page 1.

The nation's use of wireless Internet equipment, access, and applications is growing at exponential rates. The E-rate program should reflect the nation's increasing reliance on wireless technology. SDUSD believes that schools should not be left out and be made to rely exclusively on fixed, wireline technology, which is increasingly becoming obsolete.

IV. Conclusion

Wherefore, the San Diego Unified School District respectfully requests that the Commission rule that wireless internet equipment, access, and applications are all eligible for E-rate support and will be added to the 2010 Eligible Services List.

Respectfully submitted,

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