

Comments – NPB Public Notice # 15

1. Issue 1C – Barriers to Increased Broadband Deployment (p. 3)

While the E-Rate program provides funding for the internet and wide-area-network connections, significant limitations exist inside the school facilities. Each of our schools has at least a 10Mb broadband connection, but have only 1-2 network drops per classroom. Our 35% free-reduced level precludes our district from getting Priority 2 funding for internal connections.

In addition, a 2004 electrical study found that, at best, our classrooms could support no more than 5 technology devices (computers, printers, projectors). We have several schools that can only support one computer as the electrical circuit is shared between two classrooms.

2. Issue 6 - Accountability and Reporting Systems (p. 4)

The Washington (state) Schools Information Processing Cooperative provides data services (student, fiscal, personnel) for 280+ of the state's 295 school districts. One key benefit of the cooperative is the simplicity and consistency of data reporting through one common system. Data from the cooperative's systems is uploaded to the ever-struggling and ever-changing state reporting system. While it is critical that these two systems remain separate, there is significant work on the part of the cooperative to keep up with changing (and unfunded) mandates from the state and federal levels.

3. Issue 7 - Educational Data Interoperability (p. 4)

Once again, the Washington (state) Schools Information Processing Cooperative provides data services (student, fiscal, personnel) for 280+ of the state's 295 school districts. The implementation of a district-to-district student transfer is helping streamline the enrollment and placement of students as they enter a new school. Currently in pilot, this process holds great potential for accuracy and timeliness of student information.

4. Issue 11a - E-Rate Modifications (p. 5-6)

The South Kitsap School District recently implemented a broadband WAN to each of our school sites. One frustration was the need to bid for managed services, when providers were willing to provide dark fiber (unlimited bandwidth), but this service was not E-rate eligible. Pricing in the broadband market is very volatile, but usually comes with significant installation costs (\$270k for 10 sites, in our case). Even with the E-rate subsidies, it is not a trivial jump for broadband implementation.

5. Issue 11b – Technology Plans (p. 6)

The South Kitsap School District, as we prepare for future bandwidth needs, we look at current utilization, anticipated system growth (streaming video, videoconferencing,

migration of services to the world wide web) and then oversubscribe the capacity in an attempt to stay ahead of demand. Our RFP and contracts are written to allow for additional capacity within the current agreements, but the cumbersome SLD approval process slows our response to instructional needs.

6. Issue 11c – Educational Purposes Restriction (p. 6)

The Kitsap (county) Regional Coordinating Council has a standing Broadband Task Force to look at how to increase broadband penetration in Kitsap County. As the agencies share their efforts (county services, police, fire, regional library, community college, Native tribes), the schools and library are often at a disadvantage because the projects and providers are not E-rate eligible. It seems odd to our taxpayers that a government program (E-rate) restricts local agencies from working together.

If a library or school district could be the “lead agency” for a project, and include specifications that would meet the needs of other local agencies, it would help drive down installation costs for everyone. In the case of the South Kitsap School District, our installation costs were much higher because we were the first to have service in certain areas. If we had been able to join with other non-E-rate agencies (local fire departments, for example), we could have shared some of the one-time build costs that the providers were passing along exclusively to us.

7. Issue 11d – Eligible Users (p. 6)

The E-rate process is one of the most slow, complex and cumbersome government programs we work with. As with many other districts, we actually hire a consultant to help us navigate all of the nuances! Expanding the class of eligible users could not possibly improve an already overburdened system. In the current arrangement, we begin using services in July with the hope they are funded, as the Funding Commitment Decision Letters run 3-6 months late. In the case of our broadband deployment, had the funding not been approved, we would have been liable for over \$30,000 in services that had already been expended.

Without any additional funding (the current cap of \$2.25 billion has not been increased) and the unmet K-12 needs already addressed in these comments, the process needs to allow for funds to be distributed to existing needs, not add more needs.

8. Issue 12b - E-Rate Disbursement (p. 7)

While not desiring to make the formula more complex, free/reduced lunch is a broad variable that actually leads to more disparity among schools in our district. Our free/reduced percentages range from 15% to 54%, but there is not parity between this and the physical site needs! The age of the facility can be more of a factor for internal connections and installation costs than the free/reduced status of the students inside. We currently have two funding methods for internal connections: (a) take the district average and not be eligible for any internal connections, or (b) break out each individual school,

and create inequities across buildings which then create other (internal) funding challenges.

9. Issue 12c – Regional Broadband Networks (p. 7)

As mentioned earlier, the Kitsap Regional Coordinating Council desires to coordinate a county-wide broadband network to deliver cost-effective services to taxpayers. In the recent ARRA stimulus packages, some of the application questions were cumbersome as they conflicted with E-rate requirements and priorities when they could have built in harmony with E-rate to maximize the government support of broadband.

10. Issue 13b. – Additional Broadband Requests (p. 8)

As the South Kitsap School District has found with its broadband implementation, the higher backbone speeds then show the performance bottlenecks in other places such as at the school building's wiring infrastructure and the speed of desktop computing. With our current variance in Priority 2 funding, the E-rate program does not help our goal of "meeting the needs of all learners".

11. Issue 13g – Supplemental Programs (p. 8)

Once again, the EETT program uses a free/reduced factor, especially at our state level. Our district free/reduced count makes us ineligible for many of these programs, though the needs clearly exist in our district as evidenced by the wide variance in our school counts. Priority 1 E-rate is the only significant, consistent federal technology funding received by the South Kitsap School District.