

Comments – NPB Public Notice #15.

The New York State Education Department offers the following comments in response to National Broadband Plan (NBP) Public Notice 15, requesting comments on broadband needs in education, including changes to the E-rate program. Docket Numbers 09-47, 09-51 and 09-137.

The New York State Education Department is the administrative agency supporting the education policies established by the New York State Board of Regents. The Board of Regents is the policy making body for the University of the State of New York (USNY). USNY is the most complete, interconnected system of educational services in the United States. USNY includes 7,000 public and private elementary and secondary schools; 248 colleges and universities; 251 for-profit schools; nearly 7,000 libraries; 750 museums; the State Archives, Library and Museum; vocational rehabilitation services for adults with disabilities; State schools for the blind and for the deaf; 25 public broadcasting facilities; and more than half a million licensed professionals.

Broadband and Education

The Board of Regents envisions an educational environment transformed by powerful learning tools. The expansion of digital information and access will lead to increased student achievement; multiple digital learning environments, unbound by place or time; equitable access to curriculum and learning tools for all learners; and increased access to information by students of all ages through schools, libraries, museums, and other community centers, to broaden and deepen knowledge about subjects in ways unimagined by prior generations.

To be supportive of this vision, the national broadband plan should assume universal access to broadband capacity. This capacity should be measured in three basic dimensions: **universal access to high-speed broadband; digital literacy education and assistance for underserved populations** to learn how to use broadband access; and **development of effective digital content** that enhances the quality of life for all citizens.

The Department recommends that the national broadband plan define access to high speed broadband in the following way:

- All citizens should have easy, consistent, affordable, and sustainable access to broadband, either at their residence or through freely-available anchor institutions and community centers such as libraries.
- Bandwidth should be sufficient, affordable, and reliable enough to support use of voice, video and e-government/e-business applications. Such bandwidth may be different for residences, public institutions, and business, depending upon the digital content and applications needed by each.
- All broadband connections must use easily upgradeable technologies that enable citizens and institutions to improve their connectivity over time in response to advances in technology and increases in demand.

- All public libraries, elementary and secondary schools, community colleges, and other public computer centers should be served today by sustainable broadband networks capable of 100 megabits per second (Mbps) to meet current needs.

The Department recommends that the national broadband plan include support for digital literacy, defined as a citizen who possesses a basic set of technology and information evaluation skills to access and use current digital applications. Digital literacy education should include publicly-available information, support, and/or hands-on training necessary to use digital technology and understand the relative value and veracity of digital information.

The Commission has asked for background data on existing broadband capacity. The New York State Universal Broadband Strategic Roadmap contains much of the data the Commission seeks. This document was developed by the New York State Chief Information Officer, with significant input from the State Council for Universal Broadband. It is available at http://www.oft.state.ny.us/assets/documents/Final_Broadband_Strategy_June2009.pdf

The Commission's request comes at a time when the Board of Regents is deeply focused on insuring the strongest possible foundation for technology in learning and teaching. In May 2009, the New York State Board of Regents approved the following mission and vision statement as part of a Statewide Learning Technology Plan.

The education technology mission of the Board of Regents is to develop policies, recommend practices, advocate for resources, and create incentives for action that turn our vision into a commonplace reality. Our mission, through USNY, is to provide a user-friendly and seamless technology-enhanced learning environment that serves the increasing needs of our citizens.

The Regents have an urgent need to raise the knowledge, skill and opportunity of all the people of the State of New York. New technologies have created powerful new learning tools which will transform the learning environment for students of all ages. Learning technologies will be seamlessly integrated into teaching and learning to increase student achievement. USNY will use technology to measure performance and communicate results to learners, teachers, leaders, and citizens. Through USNY, New York citizens will benefit from technology that brings information and knowledge to enhance their lives.

USNY will provide learning technologies that change how students learn, what they learn, and why they learn. Students will access information to broaden and deepen knowledge about subjects in ways unimagined by prior generations.

All students will access learning materials in electronic form, including video, text, and other digital content related to the school curriculum. Students will create work, define and solve problems, and research and evaluate information using technology. Students will manage the flow of information and use technology to work with others from diverse backgrounds and locations. Our students will develop innovative approaches to communicate and collaborate.

Multiple environments will exist for teaching and learning, unbound by place, time, income, language or disability. The classroom, gymnasium, laboratory, library, theater, and museum will be a workspace for teachers and learners but will not always be a physical space. Students will access learning resources anywhere, anytime through the use of technology.

Technology is a path for teaching and learning, but it is also a body of practices, skill, and knowledge to be learned. All New York State learners will develop technological literacy to enter college, become productive members of the workforce, and succeed as citizens. Students, teachers, and leaders will have clear standards for what students should know and be able to do with technology, and these standards will be visible to the public to drive the standards even higher.

The Statewide Learning Technology Plan will be discussed at the December 2009 meeting of the Board of Regents. The technology plan includes six high-level goals to achieve the vision:

- **Digital Content:** Standards-based, accessible digital content supports all curricula for all learners.
- **Digital Use:** Learners, teachers, and administrators are proficient in the use of technology for learning.
- **Digital Capacity and Access:** New York's technology infrastructure supports learning and teaching in all environments.
- **Leadership:** USNY institutions are united in realizing the vision.
- **Accountability:** It is easy to obtain, understand, and compare information about the results achieved by New Yorkers in their efforts to build knowledge, master skills, and grasp opportunities for a better life.
- **Funding:** Funding is coordinated, adequate, and sustainable.

A draft version of the plan is available at www.emsc.nysed.gov/edtech.

This plan for technology sets the framework for our vision of broadband in New York State. It is not enough that schools, libraries, colleges, museums, and archival institutions have access to necessary bandwidth. New York must strive to achieve universal access by all citizens, wherever that access is needed, for individuals to be well-informed, educated, and productive citizens.

E-rate program

Specific feedback has been requested on how the Commission can modify the E-rate program to more effectively meet the needs of applicants. The Department recommends that the existing focus of the E-rate program on telecommunications and internet access services be retained. The program has been successful in its intent to assist schools and libraries in obtaining advanced telecommunications. Additional funding, requiring removal or a change in the current cap, is necessary to meet demand. Simplification of the program rules would encourage greater participation in the program and reduce the chance of inadvertent misuse of program funds. The Department suggests a change in program rules to support universal use of and access to E-rate

funding for libraries and educational institutions by making the E-rate program an “opt-out” program for any library or school qualifying for a discount, rather than the current “opt-in” model. This universal approach will encourage participation, ease the process of obtaining E-rate funding, lead to greater equity in access and facilitate attainment of the educational goals outlined above.

The Department supports permanent exemption from the Anti-deficiency Act (AdA) for the E-rate program.

The national broadband plan must recognize that additional funding for other necessary aspects of broadband need to be made available. Funding for digital literacy training, e-content development, computers and other access technologies must be made available to leverage the benefits of the E-rate program without placing the burden of delivering those components through the program. Development of a separate program or programs with separate funding source(s) is preferred.

11/18/09 (TR,LP,DAW/MBK)