

We find ourselves in agreement with Item 77 as it relates to the removal of Web Hosting. We have found that Web Hosting services typically sought and provided under current program rules far exceed the intent of the current ESL. Most ISP's provide web hosting and storage at minimal or no cost. We have found that serious complications arise from the interpretation of the services from many third party Web Hosting providers. These third party services are over and above what is available at low or no cost from most ISPs. Almost without exception they include additional services, whose costs are almost impossible to ascertain. The cost of many of these third party services are determined on a per student basis. They include applications, file storage, content creation and many other ineligible services. Even under cost allocation, these services are still 75% to 90% eligible. Which when examined is far more expensive than provision by other means and exceeds any definition of 'basic conduit'. Further, the cost and procurement of an individual Web Server for a School district is at most a few thousand dollars. Even for a large district. The maintenance costs in subsequent years on in house systems is very small as well. By way of conclusion, a Priority 2 Web server is not a significant investment for most school districts. High need districts would benefit appropriately under current program rules