

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of

Schools and Libraries Universal Service Support Mechanism CC Docket No. 02-6

A National Broadband Plan for Our Future GN Docket No. 09-51

COMMENTS OF MONTGOMERY COUNTY PUBLIC SCHOOLS

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Montgomery County Public Schools (MCPS) appreciates the efforts to streamline the E-Rate application process and provide for cost-effective services expanding the reach of broadband to the classroom. This memorandum contains comments regarding the technology plans, competitive bidding process, discount matrix streamlining and effective date of proposed changes.

Technology Plans - Technology plans are an essential component defining services and how they contribute to achieving educational goals and objectives. MCPS supports a standardized technology planning process incorporating the five elements required under the Federal Communication Commission's rules in Section 54.508(a). Particularly in these times when cutbacks demand greater workloads for schools, streamlining the technology planning for all districts regardless of size and eliminating the need for third party approval of technology plans provides for consistency in complying with E-rate requirements.

Competitive Bidding Process - The Form 470 provides a consistent and effective method for the competitive bidding process serving both schools and service providers in the procurement of eligible E-rate services. MCPS supports the continued use of a streamlined Form 470 for both priority one and priority two services. Items that do not add value should be eliminated including removal of area code/prefix, Block 2 data requirements, and multiple service category sections (by providing a check off for relevant categories) and enhancement of the space provided for describing the service requirements.

Discount Matrix Streamlining - Priority one services for telecommunication and Internet continue to increase and are essential in supporting school connectivity. Shifting allocations to provide more funding to internal connections and web access would have a significant negative impact on school systems in providing these critical priority one technology services. Set-asides and funding caps jeopardize the availability of priority one funds that are needed more than ever in this time of fiscal crisis.

MCPS does not support applying a single discount for the school district. MCPS is a large district with pockets of high participation in the National School Lunch Program. Applying a single discount would virtually eliminate the possibility of any priority two funding for our schools with the greatest need.

With the growing demand for services and desire to further broadband initiatives, a plan to increase the annual funding cap for E-rate based on the inflation rate is a vital step in meeting the requests received from schools and libraries and highly endorsed by MCPS.

Timing of the Proposed Changes - As planning has already begun for Funding Year 2011, MCPS recommends that any changes not take effect until Funding Year 2012.