

December 8, 2011

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Extension of usage period for EDU2011 funding  
WC Docket No. 10-222 and CC Docket No. 02-6

Dear Ms. Dortch:

The e-Bookroom Initiative (“e-BI”) is an association of schools and other educational organizations formed to promote the adoption of standardized, school-friendly, e-textbook licensing terms for the K-12 market. e-BI was initially formed by 38 of the applicants for the FCC’s EDU2011 wireless Internet pilot program (also called “Learning On The Go”), ten of whom were selected as EDU2011 participants (see Appendix B).

All of the e-BI members share the FCC’s conviction as to the importance and promise of e-textbooks and other online educational resources. And all members, whether selected or not for the EDU2011 pilot, are eager to see the FCC’s wireless Internet pilot succeed. We are concerned, however, with the limited nature of the pilot program — not so much with the funding, which we recognize is limited, but with the duration of the trial period. One year — or, as discussed below, less than one year — is simply too little time to achieve meaningful trial results.

**e-BI believes that there is a simple step that the FCC can take to at least double the duration of EDU2011 pilot without exceeding the program’s \$10 million budget.**

As currently structured, the EDU2011 pilot provides discounts on wireless Internet services for off-school or off-library premises for FY 2011 only. As such, discounts for pilot services are scheduled to end June 30, 2012. For EDU2011 participants, who waited for funding approval before beginning or expanding their wireless projects, this will mean that funding will have been provided for significantly less than one year. Our analysis is shown in the table provided in Appendix A.

The funding history of the EDU2011 program is characterized by two important points, namely:

1. EDU2011 funding awards were issued in Waves 14-23. The average EDU2011 application had an FCDL date of October 12, 2011. Assuming that the pilot participants did not begin their trials until they were funded — probably a conservative assumption, but one we believe the FCC is investigating — this would mean that the trials are slated to provide less than three-quarters of a year's worth of experience. This is hardly a meaningful trial period.
2. As a group, EDU2011 participants had applied for discounts of \$9.5 million. After PIA review reductions, EDU2011 awards totaled only \$7.1 million (including \$0.4 million in discounts for non-recurring charges). Assuming that discounts for recurring services will be fully used for less than three quarters of a year, the actual funding requirements for the EDU2011 would total only \$5.1 million. With less than 100% utilization, actual funding would fall well under \$5 million — less than half the program's budgeted cost. This, by itself, may indicate to many that the EDU2011 trial was a failure.

If the Commission is willing to maintain funding of the EDU2011 pilot at the \$10 million level, as we believe it should, e-BI believes that there would be sufficient funding to extend the existing EDU2011 trials for a full additional year — i.e., through June 30, 2013. This would provide for a trial period approaching two years and should yield a much truer test of the benefits of 24x7 Internet access availability to students and library patrons.

e-BI believes that this result could be achieved, without additional applications or reviews, simply by waiving the “last date to receive service” for EDU2011 funding from June 30, 2012, to June 30, 2013, and by expanding the participants' funding commitments proportionately.

By our calculations, shown in Appendix A, the monthly use of recurring service charges, at the approved rate, would provide for discounted services through at least mid-March 2013. More realistically, assuming an 80% utilization rate, as has been the historic rate for Priority 1 services, funding could actually be provided into July 2013 without exceeding the program's budget of \$10 million. Any errors in this total budget projection could be limited by constraining individual participant discounts to their proportionately-extended commitments.

e-BI applauds the Commission's initial decision to set aside \$10 million of E-rate funding to explore the possibilities of e-learning. We urge the Commission to commit the full amount of this designated funding to provide a meaningful trial of off-campus wireless Internet access by waiving the recurring service deadline for EDU2011 pilot of June 30, 2012 (perhaps to June 30, 2013), and by expanding the participants' funding commitments proportionately.

Sincerely,



Winston E. Himsworth  
Executive Director, CentralEd

**FY 2011 E-Rate Funding for EDU2011 Participants**

Name of Participant	BEN	City	State	471 No.	Funded Amount	Funding Wave	Funding Date	Days Left (3)	Funding Projection (4)
Aurora Public Schools	142119	Aurora	CO	806916	58,063.50	14	09/20/11	284	45,054.74
Boys' Latin of Philadelphia Charter	16050077	Philadelphia	PA	819808	95,278.23	23	11/22/11	221	57,531.39
Clay County, School District of	146121	Green Cove Springs	FL	808351	196,034.40	23	11/22/11	221	118,370.50
GST BOCES (Greater Southern Tier BOCES)	225599	Elmira	NY	798035	234,058.50	21	11/08/11	235	150,283.46
Haralson County Board of Education	127280	Buchanan	GA	795179	404,456.74	20	11/01/11	242	267,427.68
Katy Independent School District	141311	Katy	TX	816827	377,892.00	14	09/20/11	284	293,227.67
Maysville (Foxfire Center for Student Success)	16050815	Zanesville	OH	793107	121,876.65	23	11/22/11	221	73,592.18
Michigan Technical Academy	16056326	Redford	MI	789712	167,400.00	15	09/27/11	277	126,693.44
Mohican School in the Out-of-Doors	16055572	Butler	OH	800802	23,683.20	23	11/22/11	221	14,300.51
New Rochelle Public Schools	123714	New Rochelle	NY	821658	288,997.56	14	09/20/11	284	224,249.47
Onslow County Schools (NCITS)	127028	Jacksonville	NC	801470	452,727.32	21	11/08/11	235	290,685.57
Orleans Parish School Board	139223	New Orleans	LA	779770	93,909.24	14	09/20/11	284	72,869.46
Piedmont City School District	128103	Piedmont	AL	813699 (1)	861,576.94	21	11/08/11	235	695,890.48
Riverside Unified School District	143748	Riverside	CA	820912	1,067,872.00	17	10/12/11	262	764,432.96
Roy Municipal Schools	143298	Roy	NM	814947 (2)	65,259.60	23	11/22/11	221	47,688.45
San Diego Unified School District (2)	143662	San Diego	CA	791254 & 812679	1,199,165.04	20	11/01/11	242	792,890.55
Sioux City Community Schools	132300	Sioux City	IA	805648	1,129,777.20	14	09/20/11	284	876,657.72
Southern Tier Library System	125132	Painted Post	NY	808297	4,686.25	14	09/20/11	284	3,636.33
Summit Academy Management	228168	Akron	OH	810225	8,817.24	17	10/12/11	262	6,311.79
Westwood Community Schools	130890	Dearborn Heights	MI	789641	264,600.00	17	10/12/11	262	189,413.11
				NRC	419,574.27				419,574.27
				RF	6,696,557.34				4,691,633.21
				<b>Totals/Averages</b>	<b>7,116,131.61</b>		<b>10/12/11</b>	<b>262</b>	<b>5,111,207.48</b>

Notes:

- (1) Includes discounts on one-time charges = 398,666.67
- (2) Includes discounts on one-time charges = 20,907.60  
Total NRC discounts 419,574.27
- (3) Days to June 30, 2012, based on 366 days in fiscal year (incl. extra Leap Year day)
- (4) Assumes full use of NRC and proportionate use of RC through June 310, 2012
- (5) Assumes full use of NRC and extended use of RC to deplete full \$10 million

Full Funding Projections		
Utilization Assumption	Days Left	Projected Funds Depletion Date (5)
Full \$10M with utilization = 100%	524	03/18/13
Full \$10M with utilization = 80%	655	07/27/13

## Appendix B

### K-12 e-Bookroom Initiative Members

#### FCC Wireless Internet Pilot (EUD2011) Applicant Members (Participants in Yellow)

Alexandria City Public Schools, VA	Nettleton Public Schools, AR
<b>Aurora Public Schools, CO</b>	<b>New Rochelle Public Schools, NY</b>
<b>Clay County, School District of, FL</b>	New York City Department of Education, NY
CSD 158 - Huntley High School, IL	Oneida-Herkimer-Madison BOCES, NY
Dover Area School District, PA	<b>Orleans Parish School Board, LA</b>
Dysart Unified School District No.89, AZ	Pennsylvania Cyber Charter School (The), PA
Gobles Public Schools, MI	<b>Piedmont City School District, AL</b>
<b>Greater Southern Tier BOCES, NY</b>	Pinconning Area School District, MI
Hermitage Public School District, AR	Portland Public Schools, MI
Highland Park School District, MI	Prairie-Hills Elementary School District #144, IL
Hunterdon Central Regional High School, NJ	Revere Public Schools, MA
Lee County Schools, NC	<b>San Diego Unified School District, CA</b>
Lincoln Intermediate Unit #12, PA	Santa Paula Union High School District, CA
Los Angeles USD (Huntington Park SHS), CA	Saratoga Springs City School District, NY
Los Angeles USD (Melrose ES), CA	Seattle School District 1, WA
Los Angeles USD (Stevenson MS), CA	<b>Sioux City Community Schools, IA</b>
Los Angeles USD (Young Oak Kim Acad.), CA	Thomasville High School, NC
Merrill Community Schools, MI	Val Verde Unified School District, CA
<b>Michigan Technical Academy, MI</b>	<b>Westwood Community School District, MI</b>

#### Other Members

National Association of State Textbook Administrators

Association of Educational Service Agencies