

Chisum Independent School District

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April 24, 2012

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|---------------------------------------|--|---|----------------------|
| | In the Matter of |) | |
| Wesley Jackson Alternate Secretary | |) | |
| | Lifeline and Link Up Reform and |) | WC Docket No. 11-42 |
| Lisa Butler | Modernization |) | |
| | |) | |
| Dashielle Floyd | Lifeline and Link Up |) | WC Docket No. 03-109 |
| | |) | |
| Paul Hutto | Federal-State Joint Board on Universal |) | CC Docket No. 96-45 |
| | Service |) | |
| | |) | WC Docket No. 12-23 |
| | Advancing Broadband Availability Through |) | |
| | Digital Literacy Training |) | |

Dear Sir/Madame:

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes a Digital Literacy Pilot to fund schools and libraries operating digital literacy training courses. Before delving into my response to the proposed pilot, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

Chisum ISD is a rural school district of approximately 850 students. We are 45% economically disadvantaged and are 100 miles from the nearest urban area. Through the use of E-rate, we are able to provide Internet capability which affords our students the opportunities to experience many of the cultural resources only found in an urban area. Our school does virtual field trips, distance learning, go to meetings, and professional development to name a few resources using the e-rate discounted services. The E-rate funding received by our district is critical to the preparation of our students with 21st century skills needed to be positive contributors to our society.

The pilot would provide grants to K-12 schools and libraries, lasting four years, to hire trainers, conduct training courses and provide resources/materials to those who lack digital literacy skills. While the FCC does not propose to fund the pilot using E-Rate funds,

Chisum ISD does not discriminate on the basis of race, sex, disability, or ethnicity in its educational programs or employment as required by Title IX, Section 504 and Title VI.

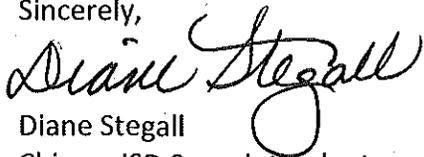
it does propose implementing and administering the program through the same division that oversees the E-Rate program. Specifically, the FCC proposes implementing/administering the program through the Schools & Libraries Division of the Universal Service Administrative Company (USAC).

I am concerned that operating the pilot through E-Rate will undermine the important and ongoing work of E-Rate, causing delays in the program's application and appeal processes, creating auditing problems and results in problematic precedents for E-Rate's eligible services. **Specifically, I oppose the proposal to operate/administer the proposed pilot through the E-Rate program.**

With the expansion of technology in public schools as well as other entities, the E-rate program is over-subscribed. We must keep E-rate for the purposes it was designed for and administer the Digital Literacy pilot through other programs. This could then be re-evaluated once the data is back from the pilot project. The importance of maintaining a functioning E-rate program is critical to public schools and I urge you to continue with the Digital Literacy pilot and manage it through other means.

Thank you for considering my response as you move forward with your decision on the Digital Literacy Pilot. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by not funding the pilot with E-Rate funding. I urge you to take similar protective measures when it comes to the implementation and administration of the pilot; please ensure that critical, limited E-Rate resources—both fiscal and administrative—are protected.

Sincerely,

A handwritten signature in cursive script that reads "Diane Stegall". The signature is written in black ink and is positioned above the printed name and title.

Diane Stegall
Chisum ISD Superintendent