



May 1, 2012

Marlene Dortch  
Secretary  
Federal Communications Commission (FCC)  
445 12th Street, SW  
Washington, DC 20554

Re: WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23

Dear Ms. Dortch:

The State Educational Technology Directors Association (SETDA), the principal association of U.S. state and territorial educational technology leaders, is pleased to submit reply comments on the Federal Communications Commission's Further Notice of Proposed Rulemaking (FNPRM) and, in particular, on the proposal to establish a digital literacy training program to accelerate broadband adoption among the nation's low-income population. SETDA has a special interest in the proposed changes to the Universal Service Funds (USF) and the E-Rate program, as our members are responsible for the implementation of educational technology programs including state digital literacy initiatives targeted to children and youth, the coordination of E-Rate funds and state broadband networks.

SETDA members recognize and support the need for comprehensive digital literacy training in and outside of schools; however, we generally concur with comments submitted by the American Library Association (ALA), the Education and Libraries Networks Coalition (EdLiNC), the New America Foundation's Open Technology Initiative and others that oppose the comingling of any funds or coordination of any digital literacy training through the E-Rate program.

We maintain that the core purpose of the E-Rate program should remain the provision of equitable broadband access and advanced telecommunications services to schools and libraries. Given increasing mission-critical needs for these services – including the ongoing shift to digital textbooks, large-scale computer-based assessment, and the rise of online and blended learning – the potential impact of administering a new digital literacy training program via the E-Rate could dilute the program and detract from its core purpose. This is doubly important given recent estimates by USAC that underscore that demand for core program services are far outstripping

available funding. The annual FY2012 E-Rate demand estimate increased by \$927 million (21.5%) since last fiscal year alone.

SETDA maintains that digital literacy training for low-income children and youth should be a higher priority and could be better accomplished via continued Congressional funding of the State Educational Technology Grants Program (Title II, Part D of the *No Child Left Behind Act*), which includes a national requirement for such training for all students by the time they complete the 8<sup>th</sup> grade. The Title IID program was defunded by Congress in FY2011, based in part on the recommendation of the U.S. Department of Education and the Obama Administration. Current legislation in Congress (i.e., *the Achievement Through Technology and Innovation Act*) would update and strengthen the Title IID program, while maintaining an emphasis on digital literacy for all students, especially students at risk.

As the FCC considers alternative options to coordinate the digital literacy initiative within its direct purview, SETDA members believe that permitting only new programs to apply is both unreasonable and will encourage the inefficient duplication of existing programs. Finally, the suggested funding amount of such programs (\$15,000) does not accurately reflect local needs or the capacity to address them. Instead, local budgets should be funded based on the demonstrated ability to serve the specific communities in question.

We welcome the chance to offer further details and information on our members' views. Please do not hesitate to contact me with any questions. I can be reached at [dlevin@setda.org](mailto:dlevin@setda.org) or at 202-715-6636 x700.

Sincerely,

A handwritten signature in black ink that reads "Douglas A. Levin". The signature is written in a cursive, flowing style.

Douglas A. Levin  
Executive Director