



May 2, 2012

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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:

On May 1, 2012, the following members of the Education and Libraries Networks Coalition (EdLiNC) met with Christine Kurth of Commissioner McDowell's office to discuss the Digital Literacy pilot portion of the Lifeline Further Notice of Proposed Rulemaking (FNPRM):

Jon Bernstein and Whitney Silverman, representing the International Society for Technology in Education and the Consortium for School Networking  
Corey Williams of the American Library Association  
Hilary Goldmann of the International Society for Technology in Education  
Lucy Gettman, National School Boards Association

During the meeting, EdLiNC expressed its support for the FCC making a digital literacy a priority and for funding a digital literacy pilot through parts of universal service other than the E-rate. We indicated to Ms. Kurth that the recent Program Year 2012 E-Rate demand letter from USAC, which stated overall demand at \$5.237 billion and calculated a 21.5% increase over last year, demonstrated that the vastly oversubscribed E-Rate program could not afford to fund any other services no matter how meritorious.

We also expressed to Ms. Kurth our concerns about the concept of operating the digital literacy pilot through the E-rate program, which would necessitate changing the program's eligible services list to include items such as labor costs, administrative costs and marketing and materials costs. Specifically, we pointed to the following possible issues with implementing digital literacy through E-Rate's administrative structure:

- 1) Likely delays in processing E-rate applications and appeals as the E-rate program's administrator would have to handle the processing of potentially thousands of digital literacy pilot applications;
- 2) Great difficulty for E-rate's administrator in auditing digital literacy pilot outlays as compared to E-rate expenditures; and
- 3) Possible establishment of precedent for using E-rate dollars for services not directly focused on the delivery to schools and libraries of basic conduit access to the Internet.

Finally, we commented on other aspects of the digital literacy pilot contained in the FNPRM, including our objection to restricting eligible applicants to only those entities that are not currently operating digital literacy training courses. We stated that we thought that scaling-up existing successful courses made more sense than trying to fund the launch of new and unproven programs.

Sincerely,

Jon Bernstein  
President  
Bernstein Strategy Group