



# NEBRASKA RURAL COMMUNITY SCHOOLS ASSOCIATION

455 S. 11th St, Ste B  
Lincoln, NE 68508

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Received & Inspected

APR 30 2012

April 24, 2012

FCC Mail Room

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Advancing Broadband Availability Through Digital Literacy Training	)	WC Docket No. 12-23
	)	

Dear Sir/Madame:

My letter is in response to the FCC's Notice of Proposed Rulemaking, which includes a proposal for a Digital Literacy Pilot to fund schools and libraries operating digital literacy training courses. I am currently Executive Director of Nebraska Rural Community Schools Association, made up of Nebraska public schools ranging in enrollment in our sparsest areas of 120 K-12 students to 1500 students across the state. Our members are critically impacted by the current E-rate program, and are very appreciative of its existence and funding opportunities. We strongly believe educational opportunity must exist for all students, and E-rate is an important component toward making that goal a daily reality.

Rural community school districts are finding their local economies in a somewhat conflicting circumstance. While the agricultural sector has been somewhat more stable, the population of free and reduced lunch qualifying families has been increasing in many districts. Over the last few years, it has not been uncommon to see free and reduced lunch qualifiers in rural community districts exceed 50%, where the norm used to be below 35%. We are finding less personal capacity to expand technology across that category, in the face of greater demands for improved student performance and broader/deeper school curricula. That places additional pressure and responsibility on the public K-12 district to help students regarding both availability and access. The E-rate program provides funding toward specific parts of this educational responsibility. And as a former seventeen-year

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superintendent, as part of my 39 years as an educator, I can attest to the funding issues local rural community K-12 districts face in their ever-increasing efforts on behalf of student learning.

Our understanding is that this 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, 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). This could help strengthen on-going efforts that schools and regional education service units have been providing. The concern is not that the pilot concept is not a positive addition, rather that, it appears to be blended into other funding and management that needs to stay focused on a critical program, E-rate.

**While we support efforts to improve digital literacy including programs like this pilot program, to fund this and/or other pilot programs through E-Rate has the potential to 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. Anyone who has worked annually to navigate the E-rate process will tell you, that it is not able to fund all requests, and is not easy to track and manage locally. To potentially dilute one program that is so necessary to rural community school districts to add another program, albeit a very worthy goal, may cause too many problems to justify potentially dividing funding and management. Providing separate and new funding and management for the pilot would make a cleaner pilot to evaluate on its own merit, without adding the potential side effects to the E-rate program. Therefore I oppose the proposal to operate/administer the proposed pilot through the E-Rate program.**

Thank you for considering my response as you move forward with your decision on the Digital Literacy Pilot. I support 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,

Dr. Jon Habben, Executive Director  
Nebraska Rural Community Schools Association

Cc: Nebraska's Congressional Delegation: The Honorable Senator Mike Johanns, The Honorable Senator Ben Nelson, The Honorable Congressman Lee Terry, The Honorable Congressman Jeff Fortenberry, and The Honorable Congressman Adrian Smith