



SCHOOL SUPERINTENDENTS of Alabama

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FCC Mail Room

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

April 23, 2012

In the Matter of )
Lifeline and Link Up Reform and ) WC Docket No. 11-42
Modernization )
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 ) WC Docket No. 12-23
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 taking this position as Executive Director of the School Superintendents of Alabama, I was a local superintendent in a relatively rural district that relied heavily on E-Rate funds to maintain Internet access for our classrooms. Now that I work with every superintendent in the state I am even more aware of the vital role E-Rate plays in advancing student learning and balancing various community disparities.

I am concerned that operating the proposed 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.

Having reviewed the available options, SSA believes that this pilot would be better administered through another program such as USF High Cost or Lifeline. The E-rate program is already oversubscribed, and using USAC to administer another program through E-rate could be detrimental to currently successful programs.

Thank you for considering my input 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,

[Handwritten signature of Eric G. Mackey]

Eric G. Mackey
Executive Director

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