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FCC Mail Room

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

April 24, 2012

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

To Whom It May Concern:

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.

My duties cover two rural school districts, both of which have a 70% poverty rate as defined by the National School Lunch guidelines. E-Rate funding has been critical to both school districts by providing funding for technology infrastructure and continued access to the World Wide Web. Adding another program administered by the USAC, which would eventually require funds to be taken from the E-Rate program, adds another layer of bureaucracy and additional paperwork for our small, isolated, rural schools who have little or no capacity to add more work to the staff.

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, 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).

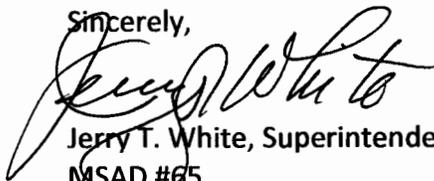
I am concerned that operating the pilot through E-Rate will undermine the important and ongoing work of E-Rate, causing delays in the program's application and appeal processes, creating auditing problems and results in problematic precedents for E-Rate's eligible services. **Specifically, I oppose the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

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Rate program has done more for schools and libraries since its inception than any other program aimed at technology for schools. Once again, diverting any funds from this over subscribed program would create a hardship on the present participants. With school funds in short supply, technology upgrades, current network commitments, and future upgrade would be seriously jeopardized.

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,



Jerry T. White, Superintendent
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