



Bangor Union Elementary School District
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Federal Communications Commission
445 12th Street SW
Washington, DC 20554

August 28, 2013

Dear Sir/Madame,

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes changes to the E-Rate program. Before delving into my response to the proposed changes, 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.

Our district is a small, rural, one school district with high poverty counts. Using state new construction and modernization monies, we have been able to provide our students the type of facilities that they deserve. However, our efforts to use these new facilities have been stymied by lack of clear definition and timelines for e-rate funding including the status of our most recent applications. As a result, we have new buildings with no connectivity or telecommunications, and no clear answer when or if e-rate will be available.

We need consistent, clear funding timelines and decisions so that we can plan. Lacking connectivity in these new buildings deprives our students of the opportunities to so use them as designed, and lacking telecommunications presents a clear safety issue. In our current budget climate, we do not have the ability to use general funds without impacting our ability to offer programs and services to students. We rely heavily on these e-rate funds, and hope to see an increase of funds to meet the demands of this very worthy and important program.

In addition the e-rate application process is both cumbersome and time consuming, requiring us to contract with a consultant. We are hoping that this process can be streamlined and simplified, so that we no longer require outside consultants to guide us through.

The E-Rate program is a program succeeding in its mission. As the FCC moves forward with this NPRM, it is prudent to remain focused on the fact that E-Rate is a program that works and that any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step the FCC can take to bolster E-Rates current and future success is to provide \$5 billion in funding, an amount commensurate with current demand.

There are additional programmatic changes and restructuring that can provide additional efficiencies and savings. To rely solely on programmatic efficiencies, however, without providing additional new funding is a shortsighted solution, a policy that fails to address the program's most significant problem: inadequate funding.

I think this NPRM is an opportunity to tackle the important work of expanding a successful program. E-Rate is not a broken program that needs to be fixed; it is a successful program that schools and libraries continue to rely on, a program that must continue to provide funding critical for telecommunications and connectivity.

Thank you for considering my response as you move forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved.

Sincerely,

Paul Arnold
Superintendent/Principal