



# FIRELANDS LOCAL SCHOOL DISTRICT

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

August 30, 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.

As the superintendent of a 90 square mile, 1,850 student rural school district, we rely heavily on the E-Rate program to ensure that we can provide our students with the technology necessary to provide a 21<sup>st</sup> century education. As the Ohio legislature continues to ignore the funding difficulties experienced by rural schools, E-Rate provides us with the necessary options to provide a technologically sound infrastructure that is imperative in meeting the pending testing requirements of the Common Core Standards.

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.

Any negative changes to the E-Rate program would severely limit the ability of the Firelands Local Schools to stay ahead of the technology curve. If we fall behind this curve, the ability of our students to become college ready and globally competitive is severely limited. It is clear to me that E-Rate is oversubscribed and underfunded. The program is cloaked in a system of bureaucracy that begs for a streamlined application process and additional funding that surpasses the current \$2.5 billion level. The days of establishing connectivity are long gone and we must move to an era of expanding connectivity, especially for rural districts with high numbers of low-income families. Our students deserve the same opportunities that are afforded in the nearby suburbs.

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,

Dr. Robert F. Hill  
Superintendent