

These comments are provided to the FCC's NPRM related to the schools and libraries program, known as E-Rate. I provide these comments in the following context: I am the Technology Director for a school district of 20,000 students that benefit from the E-Rate program. I have worked with the E-Rate program since its inception at three distinct levels: 1996-1999 at the Federal level, 1999-2006 at the State level, and 2007 until the present at the District level.

E-Rate is a program that works. Carefully consider any changes that might be made to ensure the program continues to fulfill the original promise of connectivity, work toward meeting current demand before expanding to new services, and ensure adequate continued funding support for this program. As you move forward, focus on expanding a successful program that has yet to reach its full potential. It would be my hope that any conversation around this program would be framed by methods of improving a successful program so that schools and libraries may continue to rely on telecommunications and connectivity, and anticipate expanded support.

E-Rate has always focused on increasing the connectivity and the quality of the connection of schools and libraries to the Internet. The current E-Rate program materially assists in making essential services affordable and allows me to leverage additional dollars for other areas of my budget, but there is still a great deal of work to do. Although most schools and libraries are now connected, the quality, reliability, and speed of that connection often fails to meet the demand placed upon it by our end users. Public entities often don't possess the technological capacity to keep up with the cutting edge demands placed upon their networks for teaching, learning, and administration of their schools and districts. Additionally, the opportunity to extend learning into the community and beyond the brick and mortar of our schools is often stymied by limitations placed upon access, use, and connectivity. What may allow our suburban school district to leverage access and support our educational programs may not work as well for a rural district in Idaho. E-Rate has always considered the context of the local plans, and that context should not change to an onerous system of well-intentioned incentives that prioritize certain services over others. Flexibility and autonomy at the local level are essential to improving the E-Rate program.

Hand in hand with flexibility and autonomy is the necessity to streamline the application process. If there is one place the current program has fallen short it is the reduction of paperwork and the denial of services because of errors in the application process. The new reality in school districts and libraries is that there are fewer people doing the work and all work must get done, so streamlining the application process is a necessity. Streamlining the process is different and distinct from making something mandatory, such as requiring on-line filing. As an individual district we currently complete everything electronically, but we also enjoy bandwidth and access supportive of e-filing. Some of my colleagues in other districts may not enjoy that ability.

The current cap on the E-Rate program means that demand far exceeds the available funding. Demand in 2013 exceeded \$5 billion, double the available funding of \$2.3 billion, meaning more applications for the important internal connectivity, management and maintenance of the district's and library's connectivity go unfunded. Adequate funding is essential to improving the E-Rate program.

In summary, E-Rate is one of those rare federal programs that works and only requires some tweaking. Rather than simple connectivity, expanded connectivity; rather than partial funding, full funding; and rather than onerous regulations, streamlined, flexible, autonomous procedures. These things must be the focus of the FCC.