

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
Modernizing the E-rate) WC Docket No. 13-184
Program for Schools and Libraries)

**COMMENTS BY APPALACHIA INTERMEDIATE UNIT 8
RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING**

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INTRODUCTION

Appalachia Intermediate Unit 8 (IU8) was created to furnish a broad range of educational services to the 35 public school districts, five area vocational-technical schools, two charter schools and approximately 81 non-public schools in Bedford, Blair, Cambria, and Somerset counties in west, central and southwestern Pennsylvania—serving approximately 65,000 students in an area covering 3,500 square miles. IU8 provides programs for curriculum development and the improvement of instructional materials; it also offers educational management and pupil personnel services and serves as a liaison between school districts and state and federal education agencies.

At IU8, we depend on e-rate to help finance our Regional Wide Area Network, PAIUNet, Internet access, telephone service, cellular service, cellular data plans, and web hosting. If funding was cut for our telephone services, cellular services, cellular data plans, and web hosting, IU8 would need to pay approximately an additional \$46,300 per year, which could negatively affect employee productivity and certain services that we provide.

COMMENTS

Paragraph 97 – Potential deprioritizing/phase-out of web hosting

IU8 does not employ a webmaster. Therefore, a number of IU8 personnel are responsible for posting content to the website. For several years, they have struggled to maintain this content, which was locally hosted, due to the difficulty and unreliability of the content management systems that were previously in place. As a result, the website consistently displayed outdated or incorrect information. In addition, no one at IU8 has the skills to change the graphical appearance of the website in order to update its look and put it on par with other IUs across the state.

Then, about a year ago, IU8 entered into a contract with a company for web hosting services. By utilizing one of the company's templates, IU8 was able to change the appearance of the website to a more modern design. Also, IU8 personnel now have an easier time uploading content to the website, so now the site is consistently updated. IT Department resources are also saved due to the remote hosting, which is critical because the IU has limited physical server space and only one person on staff qualified to work with advanced networks. Our annual fee for this service is \$2,340. Our discount reduces this cost to approximately \$935. IU8's website is a critical tool for informing member entities about the programs, services, and activities that are offered. Therefore, paying for web hosting is essential for us. However, with our overall budget being limited, paying full price for this necessary service would result in other IU projects or purchases not being funded, which could affect the quality of some services we provide for our member entities.

Paragraph 102 – Potential deprioritizing/phase-out of cellular data plans

At this time, 27 IU8 employees use company-issued iPhones that have unlimited data plans. These employees travel on a regular basis, so their ability to access the Internet and e-mail on their phones is important in order to correspond with IU and school district personnel. In addition, 11 employees utilize 3G-enabled iPads with unlimited data plans for the same reasoning. The total cost of these data plans for the 2012-13 fiscal year was approximately \$22,000. After our 65% discount was applied, our resulting cost ended up being approximately \$7,700. If this funding was deprioritized or phased out and we don't receive it, other activities or projects may have to be sacrificed in order to cover the additional costs. Alternatively, we could potentially discontinue our data plans and rely on wi-fi access to utilize the e-mail and Internet features of these devices, but this could negatively affect employee productivity and communications depending on where these employees are located.

Paragraph 108 – Potential deprioritizing/phase-out of voice phone service

Appalachia Intermediate Unit 8 operates not only five offices located in Altoona, Duncansville, Ebensburg, Johnstown, and Somerset, but also classrooms in 27 different locations across four counties. We have voice telephone lines in each of those locations as well as our five offices. These lines are necessary for our teachers and staff to be able to verbally communicate with parents, administrators, other service providers, etc. in a quick, confidential manner and vice-versa. In eight of these classrooms, the telephone lines also provide the Internet service through a DSL connection. In some of these locations, DSL is the only high-speed Internet option available. During the 2012-13 fiscal year, the total amount billed for these telephone services was approximately \$47,000. After our 65% discount is applied, the resulting cost for 2012-13 is approximately \$16,450. If e-rate funding was taken away from this example, we would need to pay an additional \$30,550 to sustain service at these locations, therefore hampering our ability to fund other activities necessary to sustain IU8 operations.

Comments respectfully submitted by:

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