

The entire E-Rate program needs an overhaul. I personally think there needs to be a shift from school/library-based funding to a community-based funding program. No, I don't know what that looks like, but we should be focusing on those folks who actually PAY the USF tax to be the recipients of the benefits of that tax. E-Rate funds should be used to increase bandwidth to areas currently receiving less than 10Mbps per household. Maybe businesses wishing to participate would have to partner with a local government agency to ensure proper use of the monies specifically for the purpose of increasing bandwidth. The existing FRLC (Free-Reduced Lunch Count) formula for the schools in the service area could be used to determine the amount/percentage of E-Rate eligible funding is available to said communities. Again, I don't have a solid plan for this, just some ideas I think are worth exploring.

I believe schools, districts and libraries should no longer receive monies for POTS, Long Distance, or Cell phones. The program has outlived its usefulness in this area and now these funds are seen as "entitlements." It is time to turn those funds into more prudent areas of concern.

However, *IF* schools, libraries, and districts are going to continue to receive POTS, Long Distance and Cell Phone discounts, they should no longer be required to fill out the same form every year. They should only be required to fill out a form if their situation changes: number of lines, provider, etc. There should be no need for "E-Rate Consultants" in the process. It needs to be streamlined.

IF schools, districts, and libraries are going to continue to receive E-Rate funding at all, then the discounts should be shifted to bandwidth implementation, filtering and management (again, no more POTS, LD, Cell). That is: Priority 1 should be Internet Access. That should include the cost of sufficient bandwidth to the district as to provide connectivity for daily instructional use. That may include, but not be limited to: DSL, Cellular Internet Access, High-speed dedicated access, etc. Priority 1 should include Internet filtering in order to comply with CIPA. Priority 1 should include Bandwidth Management solutions. This includes, but is not limited to: Bandwidth Aggregation, Bandwidth shaping, bandwidth management, etc. Priority 1 Bandwidth implementation should also include internal infrastructure: wiring, wireless routers/access points, switches, etc. Servers should be removed from E-Rate eligibility along with e-mail, web-hosting, and other ancillary services that do not directly impact internet ACCESS at the school, district, or library.

One solution would be to simply divide the monies among all districts based on FRLC and let the districts decide where/how to spend the money. The money would have to be spent on the types of services/equipment describe in the paragraph above. A simple report would be filed at the end of each fiscal year outlining what money was spent where. Should an audit be triggered, the district, school, or library would have to produce necessary documentation proving their purchases and implementation.

Lest my consolations be misconstrued, I am first and foremost of the opinion that E-Rate funds should be completely shifted away from schools, districts, and libraries to be focused on other areas of the communities in which those entities are located. My second choice would be to eliminate POTS, LD, and Cell from E-rate for recipients. My distant third choice covers the consolations noted above.