

September 11, 2013

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

To Whom It May Concern:

On behalf of Leadership Public Schools I am writing regarding your Notice of Proposed Rulemaking on Modernizing the E-rate Program for Schools and Libraries (Proceeding #13-184).

The charter public school population in California, as well as nationwide, is growing fast. Currently, more than half a million students attend charter public schools in California, with another approximately 50,000 students on waitlists. Even with the large number of public school students attending charters, historically, charters public schools have tended to be under-represented in the E-Rate program, which provides critical funding for technology infrastructure.

Charter schools have historically been under-represented in this program in California. In 2012, the state share was \$463 million, with charters receiving only about \$12.4 million, well less than an equitable share. This represents about three percent of California's portion of funds, though charter schools represent ten percent of public schools in the state and seven percent of student enrollment.

Charter public schools face very different challenges than traditional public schools when building their technology infrastructure. Some of the specific E-rate challenges facing charter public schools include:

- Projecting their free and reduced price lunch data in time for the application deadline and the inability to use their districts free and reduced price lunch data as a projection, as allowed for traditional public schools.
- The application deadline can often be stressful to meet
- Annual changes and restrictions on what is considered 'eligible' for discounts
- The approval process, once submitted, takes extremely long and is now often 6 months into the budgeted and requested year. This is very problematic for budgets.

With these equity concerns in mind, we ask that you take the opportunity to streamline the program and improve access for public schools. Additionally, I support the California Charter Schools Association comments on this proposal.

Sincerely,
Ellen DiGiacomo
Director of Technology