

Paragraph 23--I agree with proposed connectivity goals. We need to assume everyone at times is online simultaneously doing the most data heavy connections. The Common Core Standards require a much higher degree of technology usage, including much student and staff collaboration in the cloud. Implementing this will require much more bandwidth. Please increase the minimum connectivity goals.

Paragraph 34--Applicants should have dedicated equipment for measuring performance IF it is part of E-Rate funding of discounts, and this should really be at or near a 100% discount with no poverty data required as long as poverty data is met in other areas since it would be a requirement with funding.

Paragraph 97--No--Please do not phase out web hosting. True, it is not a physical connectivity for a school; however, by having hosting services provided outside of the school district (1) we lower overall cost, (2) we are able to provide emergency information when our systems are otherwise disabled, and (3) the hosting system manages amazing amounts of communication and document storage for students and teachers beyond what our local network could handle, enabling students and teachers to work from home or school through the hosted site.

Paragraph 149--Yes. A simplified allocation and priority system would be welcome. No more targeting funding to individual schools.

Paragraph 174--Yes. An increase to the 16 year old funding cap is needed. Times have changed, as well as inflation has taken place. New common core standards require students and teachers to work and collaborate in the cloud, and standardized testing will soon all be online. We cannot make these happen on current connectivity and with current budgets. We need the help E-Rate gives us.

Paragraph 261--Yes. It would be helpful for BEAR applicants to be directly reimbursed by USAC rather than through the provider. We have noticed that the providers (especially Verizon) take forever to provide reimbursements, which seems as though a way for them to make money via interest on stored funds since USAC is in effect using the provider as a pass through.

Paragraph 54.516--No. Don't extend the paper retention requirement to 10 years. Why on earth does an E-Rate audit need to be so restrictive? Five years should be sufficient.