

**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 Bryan Cofer, Director of Technology
Cannon County School District, TN
RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING**

Introduction

Cannon County School District is a small, rural, public school system located in Middle Tennessee. My position with the school system is Director of Technology, and I am beginning my 10th year in that capacity. Previously, I was Supervisor of Technology for another school system in East Tennessee for a period of 7 years. During this span of time, I have experienced the beginning of the E-Rate program, and have been responsible for all related school system applications/filings every year since the program began. I firmly believe that the funding provided by the E-Rate program is absolutely vital for school systems like ours, as it is simply not possible for us to afford the expense of providing the level of Internet service necessary to deliver online resources for a quality education of our students. Although the funding itself is a tremendous benefit to education, I find the administration of this funding to be considerably “overblown”. There seems to be no end to the litany of rules, regulations, applications, stipulations, reviews, etc. Even the efforts to streamline the process usually end up with the addition of more rules, and more paperwork. I can’t help but be skeptical that E-Rate 2.0 is going to continue in that regard. The idea of major reform to the E-Rate program is certainly a worthwhile idea, but this truly needs to be major reform, and not just another set of “tweaks”. I appreciate the commission’s consideration, and respectfully submit the following 3 points:

Point #1 – Priority One funding needs to be converted into formula funding.

Priority One Funding is has been 100% approved since the beginning of the E-Rate program, provided all the necessary applications are properly filed. The ultimate goal is to provide financial assistance to school

systems for their telecommunications/Internet. So, what is the point of wasting all of this time for school personnel to prepare these applications? And what is the point of spending millions of dollars to get USAC to review these applications? All of this wasted time and money could be avoided by creating a formula that divided the available funding among the school systems, and simply restricting the use of this funding to telecommunications/Internet expense. The only applications that really warrant any significant level of scrutiny are the Priority Two applications for Internal Connections. This is where the bulk of potential abuse, waste, etc. lies. This brings me to my next point...

Point # 2 – Increase Priority One Funding, and eliminate Priority Two.

Priority Two Funding is the most problematic area of E-Rate. This is where most of the waste takes place. This area has the potential for the most abuse as well. Distribution of this funding is very “spotty”, as it is usually only available to the top 10% (90% discounted Free & Reduced Schools). Once in a blue moon (when there is a backlog of undistributed funds), this becomes available to schools who are at a lower discount level. While there is an excessive amount of rules and regulations regarding application procedures and what is and is not eligible, there is nothing that actually examines the scope of the projects, or determines the level of need or impact. Priority Two funding would be better utilized if the category was simply eliminated and the funds dumped into Priority One (Isn't Priority One more important than Priority Two, anyway?). Second to that scenario, it seems that Priority Two needs are more suitable for grant applications, instead of just submitting a laundry list of items that are on an eligibility list. The grant applications could be reviewed by each state's Dept. of Education and funding distributed appropriately. In short, the Priority Two category doesn't need to be part of the E-Rate program, which brings me to my next point...

Point # 3 – Universal Service Administrative Company (USAC) is not needed.

If Priority One funding is converted to formula funding, and Priority Two funding is eliminated, then there is no need to even have the Universal Service Administrative Company (USAC). This could potentially save over a hundred million dollars annually, which could also be used to increase Priority One funding. I believe I could make a very compelling case regarding shortcomings and failings of USAC, but this really isn't the forum for that. The short answer (whether you think they are effective or not) is that E-Rate funding can be properly distributed without them.