



TRI-VALLEY LEARNING CORPORATION

September 12, 2013

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

To Whom It May Concern:

On behalf of the Tri-Valley Learning Corporation, 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:

- The inability to project 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, which is typically in February, does not align with the petition submission for charter schools and many have to wait an extra year to apply for this funding.
- Due to the application timeline challenges, charter schools have had to open with no network at all, while other schools are getting funding for upgrades.

We have experienced each of these challenges as we opened our schools. Just this year alone, we opened two schools with significant free and reduced lunch eligibility; due to



TRI-VALLEY LEARNING CORPORATION

the fact that we had no past enrollment, we were unable to install the necessary network infrastructure prior to opening day.

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,

Julie Lassig
Director of Development, Tri-Valley Learning Corporation