

9/13/2013

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

To Whom It May Concern:

On behalf of the **Summit 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:

- 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.

**Adding new schools based on current E-rate requirements places charter schools at a disadvantage because of the flat versus weighted average measurement. Our schools have a high threshold to need higher FRL based on the flat average therefore losing the opportunity to obtain additional priority 2 funding that could help enhance our schools use more of the funding to enhance the classroom learning experience.**

**Having a weighted average FRL measurement levels the playing field for new charter schools when compared to the district schools. Choice and equality is what we need to ensure all our students get equitable access to resources.**

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,

**Bryant Wong  
Chief Technology Officer  
Summit Public Schools**