



Anchorage School District

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

Sept. 12, 2013

Dear Sir/Madame,

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes changes to the E-Rate program. Before delving into my response to the proposed changes, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools to obtain affordable telecommunications and internet access.

The E-Rate program is a program succeeding in its mission. As the FCC moves forward with this NPRM, it is prudent to remain focused on the fact that E-Rate is a program that works and that any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step the FCC can take to bolster E-Rates current and future success is to provide \$5 billion in funding, an amount commensurate with current demand.

There are additional programmatic changes and restructuring that can provide additional efficiencies and savings. To rely solely on programmatic efficiencies, however, without providing additional new funding is a shortsighted solution, a policy that fails to address the program's most significant problem: inadequate funding.

I think this NPRM is an opportunity to tackle the important work of expanding a successful program. E-Rate is not a broken program that needs to be fixed; it is a successful program that schools and libraries continue to rely on, a program that must continue to provide funding critical for telecommunications and connectivity.

Phone and voice services are still fundamental and critical tools in education for communicating with parents for attendance, school safety, and other essential notifications as well as supporting school alarm and security systems. Eliminating or reducing funding of these services impacts providing this capability and conflicts with USAC support of the Lifeline Program which provides low cost telephone services to economically disadvantaged households. Typically, economically disadvantaged households do not have broadband technology at home to receive information from schools and the phone is the primary method of communication.

Additionally, replacing public-switch-telephone service with VoIP adds additional cost and complexity to implement and support that many districts cannot afford or be able to provide at a high level of quality and as a reliable phone service. This in essence is forcing schools to become their own phone company and subsequently taking resources away from educational support and infrastructure. Maintaining and supporting a network for educational purposes should be the primary focus of that service.

Implementing measurement of broadband usage is a complex requirement that would be a burden and if required should be standardized and available to all to ensure effective data is collected.

Thank you for considering my response as you move forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved.

Sincerely,
Mike Fleckenstein
Anchorage School District
Executive Director – Information Technology