

September 16, 2013

Subject: NRPM Response

This letter is in response to the FCC's request for comment on the E-Rate NPRM, proceeding 13-184. E-Rate has been of great importance to the NE Colorado BOCES and its member districts. It has helped our students and teachers gain access to a wealth of online resources, to communicate and collaborate, and to develop the 21st century skills necessary for college and career. President Obama addressed the need for connecting schools to next-generation, high-capacity broadband in his ConnectEd initiative. For the rural districts in NE Colorado, broadband connectivity at speeds of 100 Mbps was not possible until the BTOP project made connectivity with EAGLE-Net Alliance a reality. We wish to point out that geography should not be a prerequisite for broadband access--every child counts. This initiative should be for 100% of schools across the country; to ask for anything else would leave small, rural schools and communities at a disadvantage.

The NE Colorado BOCES, in support of our 12 districts, advocate raising the e-rate funding cap. The current funding levels will not allow schools to reach the access and connectivity levels that are needed in the ConnectED project.

As a BOCES, we provide direct support to students and are the avenue for cooperative purchasing for our districts. Currently, the NE BOCES warehouses and supports the infrastructure for Distance Learning capabilities between districts, requiring broadband connectivity. Because the BOCES is an integral component to small districts, we feel BOCES should continue to be funded through the e-rate program. BOCES are as integral to the business of schools as Libraries. Cooperatives and consortiums across the country are valuable, cost effective ways for school districts to leverage e-rate funding and should continue to be a valuable, local resource for schools.

Affordable Access – There is a lot of discrepancy in the cost of broadband between rural, suburban and urban districts. Rural districts continue to pay more per student for broadband connectivity. Additionally, due to small student counts, bulk buying is not an option. The total cost of ownership for educational software, hardware, infrastructure, networking . . . is more and is in direct competition for dollars left for classroom instruction and support. Therefore, committed dollars to upgrading software, infrastructure components, wireless access and WAN upgrades are depleted. Most rural districts do not have the internal connections to support a 1:1 initiative.

Cooperative purchasing makes sense in many instances for rural schools and as a BOCES we work with our schools and BOCES statewide to leverage cooperative purchasing when possible. Distance Learning capabilities would not exist without cooperative purchasing. But cooperative purchasing is not a one-size-fits-all scenario. Cooperative purchasing should be an elective based on cost effectiveness and long term plans. Local control and voice in this decision making process is extremely important—national buying projects do not always reflect the needs of the local community.

Proposed Measurements – The NE BOCES is interested in researching the cost per student measures and would support sharing of this information noting that rural districts pay more per student for e-ratable services.

Transparency - The NE BOCES is an advocate for transparency. It should be public record what districts pay for connectivity, not only for local taxpayers but also for true accountability for both providers and applicants.

We respectfully urge the FCC to increase funding for the E-Rate program to meet the growing needs of students. All schools and students need access to affordable, high speed broadband. Our nation's future depends on this success.

Sincerely,

Arlene Salyards, Technology Director
NE Colorado BOCES