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September 16, 2013

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554.

Re: WC Docket No.13-184 - Modernizing the E-Rate Program for Schools and Libraries – Notice of Proposed Rule Making

Dear Ms. Dortch:

As explained in detail below, BrightBytes strongly encourages the Commission to expand the E-rate program to provide funding for 3G/4G broadband Internet access outside of schools and to provide funding for smartphones, tablets and e-readers (and other mobile learning devices) so that America's poorest and most vulnerable pupils have the same learning tools that other pupils are using after school hours to access educational videos, online encyclopedias and collaborate with classmates.

Indeed, the growing use of mobile device and cloud services, coupled with social networking and the growth of the Internet as a distribution tool are providing many exciting opportunities for enhancing the centuries old teaching model. Today's learner grows up with a mobile device in their hands and with ready access to a bevy of educational applications and social networking tools. Brightbytes provides tools that allow educators to measure which of these new learning tools provide the best results in terms of teacher performance and student outcomes. BrightBytes's Clarity for Schools platform applies "big data" principles to help schools make sense of the data they collect by measuring the impact of the technology they're buying. Our company turns this research into actionable ideas. Indeed, educators don't need 500-page reports – they need straightforward input to decide what next steps to take to continue to improve educational outcomes.

There is no question that mobile technology enables a new world of progress in terms of improving education. The Commission's E-rate Notice, however, fails to appreciate the extent to which mobile technology is enhancing learning. Today, e-readers hold many books and reference materials and cost less than paper textbooks. These devices, like tablet computers, enable development of customized curricula; and provide a dynamic reading experience that blends written with audio and video content. Smartphones and tablets, when used with 3G/4G mobile broadband access, allow students to learn on a 24/7 basis, and this access has been shown to dramatically improve educational outcomes and enable new ways of teaching and learning. Without federal support, however, low-income students will not be able to keep pace with their colleagues that can afford devices and 24/7 wireless access and the existing "mobile divide" will expand.

Enabling learning outside of the classroom is crucial to improving education and ensuring our students are not at a competitive disadvantage in the global marketplace. Access to adequate broadband is a necessity to enable the current generation of schoolchildren to be able to compete in the global marketplace. The Commission's E-rate Notice explicitly recognizes the value of providing students access to broadband off of school grounds, but it falls short of providing full access that wide area 3G/4G connectivity offers. The Commission thus must authorize full E-rate support for such access and the mobile devices needed to take advantage of the added educational capability it can provide.

In sum, the Commission should reform the E-rate program more broadly, by including funding for mobile broadband access and devices to America's poorest pupils so they have 24/7 access to online resources that their peers are using to further their learning.

Respectfully,



Rob Mancabelli
CEO & Co-Founder