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September 16, 2013

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

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 (like mine) to obtain affordable telecommunications and internet access.

Seminole County has a population of approximately 425,071. Ninety-six percent is urban and 4% is rural. There is an unemployment rate of 6.5% and 16.5% of children under the age of 18 live in poverty. Our school enrollment is approximately 64,000 students with forty-five percent of these children on free and reduced lunch status. Of these students, 11,855 receive exceptional education services and 2,398 are enrolled in ESOL. In 2010 the cost of living index in Seminole County averaged 99.64, since then it has dropped to 86.9, less than average for Florida and the nation.

E-Rate provides the district with critical funding for technology resources to ensure academic success. E-Rate discounts vary from 20% to 90% depending on the percentage of students on free and reduced lunch. Last year Seminole County received approximately 60% in funding. With this source of funding, we were able to supplement the cost of our district network connections that allows us to connect our school district together. We were also able to supplement our telecommunication (phone services) allowing us to interconnect our schools' phone systems together and to provide local and long distance phone service to our students, teachers and district personnel.

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 would welcome the opportunity to speak with an administrator to share solutions for efficiencies.

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.

E-Rate is a critical funding source for Seminole County Public Schools today and for the future plans. It provides approximately 60% of the funding for infrastructure services. It is imperative that we continue to increase the network connectivity to the schools. With the requirement of state online testing and recent common core standard adoption, we must have the ability to provide high speed reliable connections that are needed for online testing and digital curriculum. It is necessary that we maintain and expand these connections. We are entering a new era where data is gathered, analyzed and rapidly dispersed to the teachers, parents, students and staff. This way schools can be proactive instead of reactive. With less E-Rate funding it would be extremely difficult to be able to do what is now being required by our State and Nation. E-Rate funding should be expanded and the application process should be stream-lined so that school districts can react to the ever changing digital requirements in today's world.

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,



Karen Almond
School Board Chairman