



National Association of Federally Impacted Schools

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Federal Communications Commission
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In the Matter of: Modernizing the E-Rate Program for Schools and Libraries
WC Docket No. 13-184

Comments of: National Association of Federally Impacted Schools

The National Association of Federally Impacted Schools (NAFIS), representing Impact Aid-recipient school districts nationwide, wishes to share our comments in response to the Notice of Proposed Rulemaking (NPRM) by the Federal Communications Commission (FCC) which, among other things, proposes changes to the schools and libraries program (E-Rate).

First, on behalf of the 11 million students educated in federally impacted schools, we wish to thank the FCC for its continued support of the E-Rate program. The E-Rate program provides critical discounts to assist schools in obtaining affordable telecommunications and internet access and has played a significant role in ensuring almost all schools nationwide are connected to the internet. Many school districts we represent are in rural states and communities that receive a large share of E-Rate funding. We understand firsthand the critical role this program has in ensuring our school districts have the infrastructure and capacity they need to integrate cutting edge technology into 21st century classrooms for their students.

The E-Rate program is succeeding in its mission: increasing the connectivity and the quality of the connection of schools and libraries. As the FCC moves forward with this NPRM, we advise that any changes to E-Rate 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. Currently, the program is capped at just over \$2.3 billion of the Universal Service Fund. This amount remained frozen at \$2.25 billion from 1997 until 2011. Since then, the FCC has provided a slight inflationary adjustment. The incremental addition of dollars linked to inflation, while welcome, does little to adequately address the underlying, ongoing issue of funding. In fact, demand in 2013 exceeded \$5 billion, more than double the available funding. The single most effective step the FCC can take to bolster E-Rate's success is to provide \$5 billion in funding, an amount commensurate with current demand. Any attempt to improve programmatic efficiencies without providing additional new funding fails to address the program's most significant problem: inadequate funding.

NAFIS encourages the FCC to streamline the E-Rate application process to minimize the administrative burden and allow school districts to maintain control of deciding which services to purchase. Flexibility allows the local school to use their E-Rate dollars in the way that leverages the most access in the context of their broader education and technology goals. Flexibility is the best way to strike a balance between meeting federal requirements and recognizing the unique opportunities and obstacles in each community.

NAFIS opposes per-student/per-district yearly funding caps as proposed in the NPRM because it fails to recognize high-cost service factors that often impact rural and small schools. Everything from cost of connectivity to maintenance has higher costs in small and geographically isolated locations, and per-pupil funding would unfairly shortchange all of these districts and the students they serve. Further, the E-Rate program was designed to connect schools and libraries, not fund individual children. NAFIS is concerned by the proposal to make E-Rate funding portable, as it could potentially undermine the overarching goal of connecting schools.

This NPRM is an opportunity to tackle the important work of expanding a successful program. There is still much work to be done. The quality and speed of the connection does not always meet the demand and school districts without the technology capacity to keep up with the cutting edge of online formative assessments and data tracking. Nevertheless, E-Rate 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.

Thank you for the opportunity to provide input. NAFIS strongly urges the FCC to ensure any changes made to the E-Rate program continue to fulfill its original promise of connectivity, work to meet current demand before expanding to new services, and provide adequate funding support.

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