



September 16, 2013

**Via posting on www.fcc.gov/ecfs
for Proceeding No. 13-184**

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

**RE: Comments on FCC's Notice of Proposed Rulemaking, Including Changes to
E-Rate Program**

Dear Sir or Madam:

This letter addresses the Federal Communication Commission's ("FCC") Notice of Proposed Rulemaking, which included proposed changes to the E-Rate program. Kansas City Public Schools ("KCPS"), like most public school districts in the United States, participates in the E-Rate program to obtain affordable telecommunications and internet access. Accordingly, before addressing the proposed changes, I want to first thank the FCC for its continued support of the E-Rate program.

The E-Rate program is succeeding in its mission to secure access to affordable telecommunications services to schools and libraries. Like the technology it funds, however, the program is strained from increasing demands for "faster" and "more," while struggling under persistently low funding. The most effective step the FCC can take to bolster the E-Rate program's current and future success is to provide \$5 billion in funding, an amount commensurate with current demand.

KCPS is an urban school district, comprised of approximately thirty-two schools and two administration buildings. KCPS has an extremely high percentage of free-and-reduced lunch students, with an average E-Rate weighted discount for the district in 2013 of 89% (only one percentage point below the highest discount level of 90%). KCPS applies for E-Rate funding each year for priority one telecommunications and internet services. KCPS's applications for maintenance of its almost nine year old wide-area network equipment was denied the last two years because all available funding was allocated before reaching KCPS's discount level. KCPS has applied for funding in FY2013 for a new telephony system (its current system is twenty years old) and a new firewall. During a recent discussion with USAC, KCPS personnel were informed funding was unlikely to reach the 89% discount level for these requests. KCPS also was planning to request E-Rate funding in FY 2014 for an update of its wide-area network equipment, which is ten years old and extremely outdated, but without E-Rate funds, which is unlikely at the current rate of program funding, KCPS cannot afford the update of the equipment.

While a discount rate of 89% in the past would have secured priority two funding, currently, only schools and libraries in the 90% bracket are likely to receive any funding for internal connections,

leaving schools and libraries in desperately poor communities, like KCPS, with the inability to update their rapidly aging technology infrastructure. With the need for increased bandwidth and speed to support the increased use of digital curriculum, this inadequacy will result in an inability to serve the technology needs of the children in these communities.

KCPS agrees with many of the proposed changes in this NPRM. For example, streamlining the effectiveness of E-Rate administration through requiring electronic filing of all documents, speeding USAC processing of applications, simplifying the eligible services list, and streamlining the appeals process will result in decreased costs and increased efficiency. KCPS already files all documents electronically where possible, and supports moving to an all-electronic filing process. Electronic filing of Form 500s, for example, also would aide in applicants easily returning unused funds back to USAC at the end of the funding year, when they realize those funds will not be needed. 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 of inadequate funding.

Thank you for considering this response as the FCC moves forward with its decision on the E-Rate program. I urge you to ensure the future of the E-Rate program by supporting significant increased funding.

Sincerely,


Shana J. Long
Senior Staff Attorney and
E-Rate Compliance Officer

cc: R. Stephen Green, Ed. D., Superintendent of Schools
Allan Tunis, Chief Financial Officer
Ray E. Sousley, Chief Legal Officer
Thomas Brenneman, Executive Director of Technology