

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)
Modernizing the E-rate) WC Docket No. 13-184
Program for Schools and Libraries)

**COMMENTS BY Leake County School District
Carthage, Mississippi**

RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING

I write to provide Comments to the FCC on the E-Rate NPRM, proceeding 13-184. The E-Rate has been of great importance to my school district because 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. However, E-Rate funding levels have not kept pace with my district's current and future bandwidth needs. I urge you to consider raising the E-rate funding level to at least \$5 billion per year, which is close to the average demand level for each of the past two years.

As a Technology Coordinator in Mississippi, I know that seamlessly infusing digital learning throughout the school curriculum is a pre-requisite for students to graduate from high school with the skills and knowledge they need to succeed in today's global economy. Access to high speed broadband is the key for modern teaching and learning to occur in all schools across the country.

In my school district 0 we use digital learning to meet common core state standards, administer online assessments, perform online testing, and make data driven decisions.

My school district network is currently failing to keep up with demand, and the need for a high speed reliable network is only going to increase in the near future.

The E-rate program has been a phenomenal success in bringing Internet access to almost every classroom in America. In the last funding cycle applications from schools and libraries totaled more than \$5 billion, more than double the available funding. I respectfully urge the FCC to increase funding for the E-Rate program to at least \$5 billion to meet this demand. All students need access to high speed broadband. Our nation's future depends on their success.

The Leake County School District (LCSD) is located in Carthage, MS. The mission of the Leake County School District is to provide a high quality education that will increase the learning of all students. The Leake County School District's vision will be to graduate critical thinkers with the skills and knowledge to succeed in life. The school district provides the technology environment to achieve this mission and vision of the district. The primary goal of the technology environment is to support the educational and instructional endeavors of the students and employees of the Leake County Schools. The Leake County School District consists of approximately 3200 students with 6 campuses and 5 office locations in the district. Currently our campuses and district offices are connected with metro Ethernet data circuits and we pay for a 100 mbps internet circuit with pricing provided from the State Master Contract (SMC). AT&T is the data and Telcomm provider from that contract. The district has submitted its own competitive bidding process a few years ago and at that time, the State Master Contract was the best solution. At the present time, no other Telcomm provider has run fiber in this county so the construction costs for any other provider to offer a competitive bid does not seem feasible. We as a district are happy to have the State Master Contract to provide us with the best possible solution. We as a district are in need of alternative monetary solutions for Telcomm providers to provide the fiber infrastructure construction costs so that we can achieve competitive ongoing monthly rates that other districts in the state have available. We are happy to respond to the proposed rulemaking as it relates to particular technology environment of the Leake County School District.

RESPONSE TO II, GOALS AND MEASURES, A. BACKGROUND

We agree with the goals stated in this section. We feel that the first goal of affordable access to 21st century broadband can be achieved by deriving a solution for Telcomm providers to drive down the costs of building out fiber infrastructure in rural areas such as ours with funding programs outside of the scope of erate. We feel that even though AT&T has fiber in our county, it is inadequate to provide the service to our rural students as evidenced by the MOTE survey that shows many of our students do not have internet service in their homes because dial up is still their only option. Learning cannot continue at home after school at the same level because of this woefully inadequate service. This affects not only our students but many of our educators as well and seriously hinders their planning time for students. We also feel that, even though we are being provided fiber connectivity to our schools at this time, if the demand for bandwidth increases at the rate proposed in the near future, our local provider will not be able to keep up with the demands without some major replacement of equipment and infrastructure in their central hubs in the area. It is our hope that ConnectED and other programs proposed may help to provide the necessary funding for these much needed upgrades in infrastructure.

Maximizing the cost-effectiveness of E-rate funds takes on many factors and all are needed to be included in the equation. Each district is unique in its environment and how that infrastructure is built cannot be duplicated to fit every district but we can agree on certain factors that are necessary in building out any network infrastructure. We think the focus should be on building out internet access to the student and not the building. While there are many ways to achieve this, there are certain eligible items that should be excluded that are no longer the means to achieve this goal that they once were. Each eligible item should be examined to see if it is the necessary means to provide internet service to the student and if not, then it should be looked at possibly being removed from the list.

Streamlining the administration process should be looked at closely so that each funding year the applicant will know whether or not funding will be available prior to the next year's 471 deadline. It is extremely hard to go through the erate process while still waiting on funding results for the current year. It also affects the district's budget process when your erate budget for the funding year expires June 30 and no notification has been given as to whether or not your P2 funding will be approved and you have to plan another budget year with 2 years of erate budget carried forward (current and prior) in the hopes you may still get funded. This alone could result in getting funded in the next year and having to return those funds due to budget constraints of multiple funding years.

B. ENSURING SCHOOLS AND LIBRARIES HAVE AFFORDABLE ACCESS TO 21ST CENTURY BROADBAND THAT SUPPORTS DIGITAL LEARNING.

Without responding to each section individually we would just like to point out that most school districts have technology departments that are woefully understaffed. Very few have over one or two individuals who maintain the entire technology infrastructure for the district which includes all switches, routers, access points, cabling, filtering, monitoring, firewalling, computers, tablets, software, printers, copiers, cell phones, smartboards, etc and includes both installation and maintenance of said equipment. Out of those staff members, very few of those individuals have

much technology training outside the classroom. Putting strict requirements to monitor, record and report data bandwidth usage and output will put undue stress on these staff members and be entirely out of their scope of their knowledge. This could require the districts to hire outside technicians and further the financial burden of districts that have budgets already stretched beyond their limits. We think the burden of bandwidth monitoring and usage should be provided from the ISP providers who are equipped to accurately measure these data elements.

SPECIFIC SERVICES FOR WHICH SUPPORT MAY NO LONGER BE APPROPRIATE

We can all agree that in the 16 years that erate has been around, the technology available to achieve our goals has drastically changed. What was relevant in year 2 of erate may not be relevant in today's environment. We do think that certain services may no longer be necessary and should be phased out of the eligible services list. The criteria should be focused on answering the question is this equipment or service necessary to achieve the 3 goals as stated in the introduction? Primary focus should be to provide internet access down to the student level in the classroom and the infrastructure it takes to provide that whether it be wireless, wired, access points or switches.

SUPPORT BASED ON DISTRICT-WIDE ELIGIBILITY AND APPLICATION BY SCHOOL DISTRICT

If the erate program removes the 2 of 5 year rule then going to a district wide eligibility might be feasible. However if not then consider this option where a district would apply for services based on per site need. By doing this a district can spread out the budget cost of upgrading when applying for one site per year. This becomes a more manageable solution in terms not only in cost but in purchasing and installing the equipment. Again remember that it may be one individual who oversees the process of erate bidding, application, purchase orders, invoicing, and installation of the project. The logistics of doing this on a per site basis is much more feasible than having to do all schools in a single calendar year.

While there are many facets to consider with the Erate 2.0 proposal, we feel that foremost in our minds while making decisions and changes should be the focus of what is best for the student. By what process can we provide the fastest, most affordable internet access to that student in the classroom. I have no doubt that if we keep this as our focus we can all work together to achieve our goals in a very successful manner.

Thank you for investing in the future of our children.

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