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**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 )

**INITIAL COMMENTS OF THE HUMBOLDT COUNTY OFFICE OF EDUCATION RURAL  
TELECOMMUNICATIONS CONSORTIUM REGARDING  
NOTICE OF PROPOSED RULEMAKING**

To Whom it may Concern,

E-rate funding is very important to the Schools in Humboldt County, California. We are a very rural County with many isolated sites. The Humboldt County Office of Education Rural Telecommunications Consortium represents 21 School Districts, serving approximately 6000 students. Due to the high cost of services in our rural County, it is critical that E-rate funding continues to be available to our Consortium members. As the Consortium facilitator, I appreciate the opportunity to highlight some areas of the proposed rule changes.

**III. C. 2. District Wide Eligibility:**

Using the average discount for the School Districts will greatly lower of the administrative work to process the applications for USAC. This is a fair distribution of E-rate funds for priority one services that are generally shared services. However, priority two requests should still be calculated at the individual site level. Funding of the match for priority two projects, specifically internal connections, is raised at the site level, often times by community fund raising or donations. The higher discount sites do not have the same community resources to prevail upon. Also, the averaging of the discount of district will take many individual schools to a lower discount rate and make them ineligible to receive consideration of priority two funding.

**III. C.3. Funding for Rural Schools:**

Humboldt County is rural territory. We have multiple obstacles in supplying services to our schools. The geography limits the types of technology available to many of our sites. The initial investment to connect a school in remote areas is often prohibitive. So, there is a lack of service providers willing to bid for low recurring cost contracts trying to recoup their investments.

Our districts are single small school districts. Funding based on ADA or number of sites will not bring enough funding for our higher cost of services. Funding will need to continue at the level of true cost for rural schools.

**IV. B. Consortium Purchasing:**

We have created a County level consortium to increase our buying power in our rural territory. This has been successful in negotiating for services. But, it must be stated that many of our high discount schools do not receive funding at their true eligibility due to the averaging of the discount at the Consortium level.

Specifically, one of the Consortium's contracts is funded at a 72% discount level. There are 2 very small schools that would be funded at 90%, but they cannot attract a service provider outside of the Consortium. To increase their bandwidth, these two schools must pay a higher price for the bandwidth at a much lower discount rate.

The consortia applications lessen the administrative work for USAC. For our rural area, it does not offer our districts an economical advantage. An idea to increase additional Consortia participation would be to offer a discount additive like the rural entities receive.

Thank you for this chance to voice my comments.

A handwritten signature in cursive script that reads "Mary Diegan".

Mary Diegan, CCTO  
Rural Telecommunications Consortium Facilitator  
Humboldt County Office of Education