



Comanche Independent School District

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August 30, 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.

Comanche ISD is a small rural PK-12 district in central Texas with a high incidence of generational poverty, minority enrollment, migrant and first generation immigrant students. With the assistance of E-Rate funding through the years, this district has successfully deployed multiple robust technology strategies to mitigate those barriers to student success. Such strategies include a one-to-one laptop initiative, bring-your-own- device, and virtual course offerings at the high school campus. Additionally, we participate in many distance learning activities at all levels and are continuously striving to integrate technology across the curriculum. However, our infrastructure has about reached its capacity and without continued support through E-Rate funding, our ability to continue to equip our students with the tools they will need to be successful in their future will be dramatically impacted.

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 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.

Since its inception, E-Rate has been focused on increasing the connectivity and the quality of the connection of schools and libraries. When I first came to this district as its superintendent in 2000, there were only 65 machines in the entire district connected to the internet. With the assistance of E-Rate funding, there are now 1,500 machines networked, successfully removing many of the barriers to student access that still exist in their homes and around our community. Please do not reduce this program that is proving to be meeting its desired outcome.

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,
Rick Howard, Superintendent
Comanche ISD