

September 10, 2013

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

Dear Sir/Madam,

I am writing in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes changes to the E-Rate program. Thank you for the opportunity to comment on these important regulations, and for your continued support for the E-Rate program, which provides critical discounts to assist schools to obtain affordable telecommunications and internet access.

The Collaborative for Educational Services includes 36 member school districts located in Western Massachusetts. E-Rate funds play a critical role in funding Internet access for our members, many of whom are located in the most rural areas of our state. Without this funding our districts would not be able to access the rich content and courseware that is hosted on the Internet, and soon would not be able to administer the new computer-based assessments which will measure students' yearly progress toward meeting the Common Core curriculum goals. Many of our students have no access to high-speed internet in their homes, making schools the only place they can take advantage of the many vital educational resources available on-line. In addition to working with our member districts, we also manage contracts for educational services in juvenile correctional institutions and state run mental health institutions for youth. These facilities benefit from E-Rate funds and internet access provides valuable educational opportunities for these students to continue their education and obtain the skills they need to re-enter society and obtain productive employment.

E-Rate is a program that works. As the FCC moves forward with this NPRM, we urge you to mindful of this fact and focus any changes 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 funding is a shortsighted approach that fails to address the program's most significant problem.

We believe 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 critical funding for telecommunications and connectivity.

A change in E-Rate funding would be catastrophic to the member districts we serve. The fiscal landscape for school funding in our state is bleak; if there is a reduction in E-Rate funds, many of the students we serve will be cut off from one of their few connections to the world at large. It is imperative to increase funding so that Priority 2 services are funded for a greater number of districts.

Many districts have aging infrastructure that will not support the wireless requirements and bandwidth necessary to implement current on-line content, let alone support the technological advances to come. The only reliable funding source for large infrastructure projects is Priority 2 funding and this pool shrinks each year. This funding must be increased to meet the demands and provide equity to all children regardless of their school address.

Thank you for considering my response as you move forward with your decision on the E-Rate program. We applaud the FCC for its continued efforts to preserve and protect the resources of the already oversubscribed E-Rate program and urge you to support significant increased funding for this vital initiative.

Sincerely,

Joan Schuman, Ed.D.
Executive Director

Angela T. Burke
Chief Technology Officer