



100 Mount Clinton Pike  
Harrisonburg VA 22802

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

September 3, 2013

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.

The Rockingham County Public School (RCPS) division is located in the heart of the rural and beautiful Shenandoah Valley of Virginia. Rockingham County students attend 15 elementary, 4 middle, 4 high schools, a governor's school, a technical center, and an alternative education center. Over 1,850 full-time employees support approximately 11,400 students.

Our division uses E-Rate Priority 1 funding to offset telecommunications costs. E-Rate covers just over 60% of those costs, allowing us to upgrade our WAN to leased fiber and increase our Internet bandwidth to 300 Mbps this school year. That said, we are well short of the State Educational Technology Directors Association recommendation of an Internet connection of 100 Mbps per 1,000 students/staff and WAN connections of 1 Gbps per 1,000 students/staff.

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.

Demand for E-Rate has regularly exceeded the program's funding cap, currently at \$2.34 billion. In fact, FY12 demand was not only more than double the cap (\$5.2 billion), but the available funding was only enough to provide for Priority 1 services, leaving virtually nothing to support schools' internal connections. As our division continues a transition from print to digital resources, we are facing an inadequate wireless infrastructure in our schools.

Our high and middle schools, while providing building-wide managed wireless networks, lack the density required to adequately support a 1:1 computing environment. Even further behind, our elementary schools' wireless networks consist of stand-alone wireless access points. More flexibility in the application of E-Rate funds would allow us to address those critical internal connection needs.

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,

A handwritten signature in black ink that reads "Carol S. Fenn". The signature is written in a cursive, flowing style.

Carol S. Fenn, Ed.D.  
Division Superintendent