



BIG SPRING SCHOOL DISTRICT
Office of the Superintendent of Schools
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September 13, 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. The E-Rate program provides critical resources that the Big Spring School District uses to obtain affordable telecommunications and internet access.

Our district is a rural district of 2,700 students encompassing 200 square miles. Most of our land is used for agricultural purposes. Our poverty rate just topped 40% this year. Like most school districts in our situation, we are challenged financially and E-rate allows us to get basic telephone and internet connection (priority one) services; we've never been able to access priority two services despite the challenges of rising poverty and our large boundary area.

As the FCC moves forward with this NPRM, it is prudent to remain focused on the fact that E-Rate works and any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential. There are additional programmatic changes and restructuring that can provide additional efficiencies and savings. However, to rely solely on programmatic efficiencies, without providing additional new funding is a shortsighted solution, a policy that fails to address the program's most significant problem: inadequate funding.

The Big Spring School District supports the following changes to the program:

- Improve, streamline and mandate the online application process
- We do not support targeting services for additional support; we prefer local flexibility
- We strongly support modification of the discount matrix that only allows 90% schools to access tier 2 services. With only a 10% match, they order cutting edge network equipment while we struggle to get basic services.
- We support the calculation of discount rates at the district level to help offset the disadvantage of our large boundary area.
- We support allocation of E-rate service on a per-student basis using a modified discount matrix; this would mitigate some of our challenges above and current inequities in the funding formula.

Thank you for considering my thoughts 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, appearing to read "Richard W. Fry". The signature is fluid and cursive, with a large initial "R" and "F".

Richard W. Fry
Superintendent of Schools
Big Spring School District