

Federal Communications Commission
16, 2013

September

Re: Federal Communications Commission FCC 13-184
Modernization of the E-Rate Program for Schools and Libraries
Notice of Proposed Rulemaking

Dear Commissioner,

Let me start by commending you and your organization for embracing change and the “hard work” ahead. Over the years the E-Rate program has been a great asset to so many. I believe through efficiency, true competition and leveraging the best of advancing technologies, your vision of a better program is prudent and possible. Dallas ISD has proven this recently and it is therefore from this observation that I offer the following input.

Dallas ISD maximized procurement methods and advancing technologies by introducing true competition and technology advancements for network electronics and telecom services thereby reducing the initial cost by 50% and the annual cost of services by 60%. All of these savings could be replicated by other districts with the FCC proposed changes in the incentive structure. The initial cost savings came by opening procurement to all providers and moving away from the idea of a “closed shop” which is so very common across many districts. The annual savings comes from truly open competition. By moving away from traditional telephone services, collapsing two networks into one and leveraging the dark fiber leasing options now available, cost go down while reliability goes up.

Based on observations, I offer the following:

- 1) To achieve cost savings for both the FCC and local districts, the program needs prudent reform in the procurement method and reliance on established providers and manufactures. As experienced in Dallas, true competition in the form of open bidding not specific to any manufacture or provider will achieve a tremendous cost savings. This will require education and support to some districts as change can be a challenging endeavor.
To enable districts to mix network electronic manufactures and service providers, contracts have to be fair concerning termination fees and proprietary features that preclude migration or interoperability. Either rules should be establish that prevent such contracts or standardized contract clauses and criteria adopted as a requirement for funding.
- 2) The practice of replacing equipment every 3 years just because you can is not an appropriate use of public funding. Most equipment installed today should have a service life of at least 7 years if selected properly. Yet, some critical components are rapidly advancing benefitting students safety and access to “advanced services”. I recommend extending the life expectancy of general network electronics, while shortening the life of core networking in support of Internet connections.
- 3) Student computing mobility is the future of education as the classroom extends beyond campus walls. Students with wireless devices supporting classwork, communication and collaboration with educators is now common. “Advanced services” now include unified messaging, mobile devices and cloud based educational resources. Internet access from both the traditional school building and the student’s home is necessary to meet student needs for education. Many students in both low income urban areas and those in un-reached rural areas share this need for connectivity to the Internet. This matter alone continues to drive a wedge between societal classes. Additional consideration and program flexibility for technological advancement in the area of mobility and its educational application, should be considered.

- 4) Another technological advancement not yet accepted is Unified Messaging as a form of Voice over IP. As properly suggest “voice telephone services”, do not directly serve students other than life safety systems such as code required fire alarms. Yet in conjunction with mobile computing is the need for students to communicate and collaborate with educators and fellow students. Whether in the form of chat, text, messaging, voice, video phone, document collaboration or screen sharing, unified messaging is a growing “advanced service” for students. I suggest the licensing and required support systems for Unified Messaging as an educational tool be included in the eligible funding.
- 5) The idea that the funding should “follow the student” has issues in the application. While the idea of funding being student focused is good, in practice, technology installation is a facility or school building application. Historically, this has been a matter of confusion as to how cabling and network electronics can “follow the student”. I suggest initial funding be established by student population but then be implemented and set by school building or rather location. For instance, the application and cost of a fiber cable connection is the same for a 5000 student high school as it is for a 300 student elementary. Conversely, the port count and cabling cost is directly correlative with the student population. A simple building based formula could separate the common cost from the student based cost.
- 6) The flat rate per student raises concerns as the actual cost of systems and services may disable some districts from being able to provide advanced services to students at all. If the district does not have the matching funds then the funds provided my go unused nor meet the intended need. Conversely, at other times districts may receive too much funding thereby incentivizing them to overspend. Therefore, the actual cost method is better than a flat rate system.

Educating All Students for Success,

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