

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of

Modernizing the E-rate  
Program for Schools and Libraries

WC Docket No. 13-184

**COMMENTS OF SCHOOLWIRES, INC.**

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## SUMMARY

In the twenty-five years since it began, the Commission's Schools and Libraries program, also commonly referred to as the E-rate program, has been a catalyst for connecting the nation's schools and libraries to the Internet, bringing the promise of connected classrooms and digital learning to communities across the country. In its Notice of Proposed Rulemaking, the Commission proposes an array of updates to bring the program in line with the needs and realities of twenty-first century schools and libraries. **Critical among these needs is universal access to high-speed broadband.**

Schoolwires, Inc. is a highly respected and fast growing educational technology company that provides services to more than 11,000 public schools in 47 states across the United States. Schoolwires has surveyed its customers to obtain their views on E-rate modernization. Despite tight survey response deadlines during the busy start of a new school year, more than two hundred educational leaders responded to ensure that the views of their districts would be heard and represented in our response. Speaking on behalf of its public school partners, Schoolwires applauds the Commission's initiative and believes that the best reforms are those that will make it easier for schools and libraries to get the support they need for the services they want and need. Based on the feedback from the schools, Schoolwires makes three primary recommendations:

- 1) Streamline program administration and competitive bidding processes so that schools and libraries can participate in E-rate with as light an administrative burden as possible while continuing to ensure program integrity.
- 2) Invest in the communications infrastructure that educators prioritize as critical, including services that drive engagement and support next generation digital learning.

Specifically:

- Support high-capacity broadband which can help set the stage for successful digital learning initiatives;
- Maintain Priority 1 funding for web hosting services, which school leaders tell us meet critical educational, administrative and communications needs within their district communities. If web hosting is eliminated as an eligible service, parents,

teachers, students, and other community members may lose access to those services. Many school districts (especially rural and urban school districts, which have the least economic resources and the greatest need for the benefits delivered by web hosting services) will be forced to find funding for their website hosting from other existing and limited budgets. Web hosting is essential to the educational purposes of schools and is instrumental to the ability of school districts to address the academic and communication imperatives that are mandatory for the success of students.

- 3) Carefully design program changes to minimize unintended hardships on schools, libraries and the students, parents, teachers and community members who currently benefit from eligible services today. For example, avoid “flash cuts” to any service that is removed from the eligible services list as it is updated.

Schoolwires and the school districts it supports appreciate this opportunity to comment on the Commission’s proposals for E-rate, and look forward to an ongoing dialogue about how best to update and improve this important and successful program.

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**COMMENTS OF SCHOOLWIRES, INC.**

Schoolwires, Inc. (“Schoolwires”) submits these comments in response to the Notice of Proposed Rulemaking (“NPRM”) released by the Commission on July 23, 2013, in the docket listed above.<sup>1</sup> Schoolwires, a provider of education-focused web hosting services to school districts across the country, supports the Commission’s efforts to modernize and streamline the E-rate program. It is concerned, however, by the NPRM’s request for comment on whether E-rate support for web hosting should be phased out, and appreciates the opportunity to explain the benefits of web hosting in these comments. Among many other benefits, web hosting plays a critical role in driving the adoption and effective use of broadband services by schools—a fact recently confirmed in a Schoolwires survey of the many school districts it serves. The survey data clearly indicates that web hosting services perform “critical educational functions” (99% of respondents agree) and are “more important now” (98% of respondents agree) than when the web hosting was added to the Eligible Services List. Because today’s web hosting services utilize advanced Internet technology and meet essential needs, 100% of respondents indicated that “web hosting should remain funded within the E-rate program as a Priority 1 service.” The

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<sup>1</sup> *Modernizing the E-rate Program for Schools and Libraries*, Notice of Proposed Rulemaking, WC Docket No. 13-184, FCC 13-100 (rel. July 23, 2013) (“NPRM”).

survey also confirms that school districts support proposals in the NPRM that are designed to streamline the E-rate program, such as those intended to streamline the application process, as well as removing outdated services (including paging and dial-up Internet service), as long as these changes are phased in over a reasonable period of time so that any hardships imposed on schools are minimized.

## **I. INTRODUCTION**

### **A. About Schoolwires**

Founded in 2000, Schoolwires is a highly respected education technology company with offices in the United States and China that has participated in the E-rate program since 2003. The Company is headquartered in State College, Pennsylvania and is led by a diverse and experienced group of people who are passionate about leveraging technology and best practices to drive engagement within K-12 communities and to support twenty-first century digital learning.

Schoolwires provides software and services, including web hosting services, to over 1,500 K-12 school districts and education agencies across the country. The company's customer partners range from small, rural schools with student populations of less than 100 to large urban systems such as San Diego Unified School District, Oakland Unified School District, Houston Independent School District, Baltimore City Public schools, Boston Public Schools and Loudoun County Public Schools.

**Schoolwires advocates on behalf of its network of approximately 1,500 K-12 school districts and education entity customers. This network includes:**

- 11,000 schools in 47 states (more than 1 out of 10 US schools)
- 32 of the nation's largest urban districts
- >300 hundred small and/or rural public school systems
- More than 70 education service centers and leading non-profit education associations
- 600,000 educators
- In total, an estimated 11 million students, parents, teachers and administrators

Schoolwires actively partners with teachers, administrators and educational thought leaders to design and continuously update its offerings to meet their evolving technology needs. As a result, the company's products and services effectively meet the specialized needs of districts, schools and educators. Schoolwires' services support district, school and student success by strengthening school communities, fostering parental involvement, facilitating student engagement and supporting digital learning goals. Schoolwires' services also drive broadband adoption.

One of the most critical services offered by Schoolwires — *web hosting* — is eligible for funding support through the E-rate program.

**B. About Web Hosting**

Simply put, a web hosting service is one that hosts a school or library website. Web hosting services include Internet connectivity, storage and website administration tools for the creation and maintenance of school and library websites. In addition, eligible web hosting services can and often do include password-protected pages, interactive communication features such as blogging and webmail, and other features that facilitate real-time interactive communication to better connect members of the school community.

Web hosting has advanced far beyond the early, static web pages offered when E-rate support was first authorized as a Priority 1 service in 2003. At that time, web sites were often static pages created by people with specialized technical skills.<sup>2</sup> Today's Internet is part of students' lives and learning style and is anything but static: tools abound that allow students to actively contribute to the Internet's evolution in ways that dramatically enhance their education. This new and dynamic state of the Internet is often referred to as Web 2.0.<sup>3</sup> Web 2.0, which was made possible in schools through web-hosting services, has enabled teachers to create a variety of engaging online learning activities for students,<sup>4</sup> including furthering students understanding of art and making art,<sup>5</sup> sustaining student engagement in health education through blogging,<sup>6</sup> fostering student's learning of Shakespeare with YouTube,<sup>7</sup> and encouraging more relevant classroom discussions by allowing students to post online comments regarding aspects of reading assignments they find confusing where they can express themselves anonymously.<sup>8</sup>

Thus, the role of school websites has expanded dramatically over the past decade. And, as the chart on the following page conveys, school leaders tell us that web hosting is dramatically more important now than it was in 2003 when the service was added to the ESL.

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<sup>2</sup> Brunsell, E. and M. Horejsi, *Introducing Science 2.0!*, *Science Teacher*, 77(1): 12-13.

<sup>3</sup> *Id.*

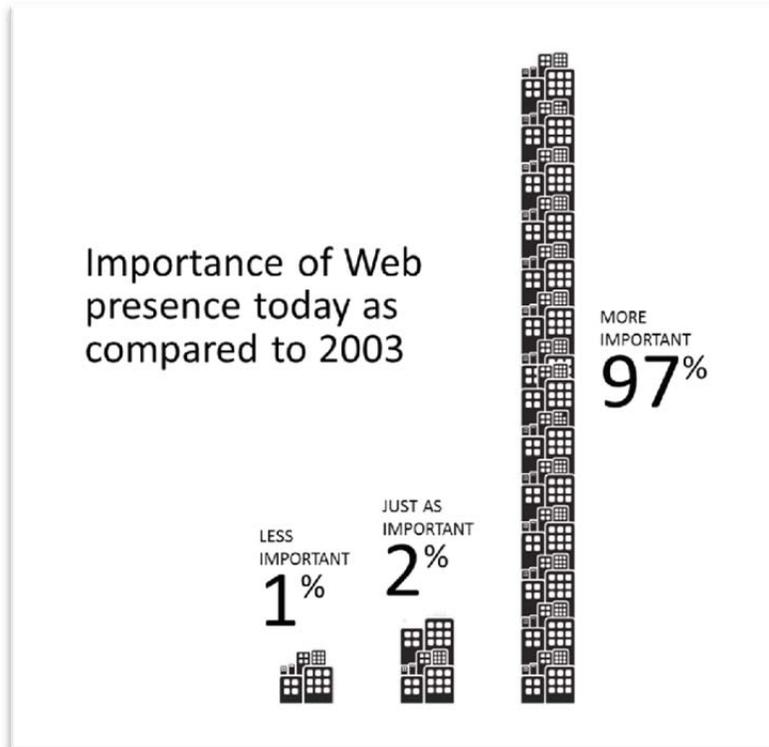
<sup>4</sup> Brunvand, S. and H. Abadeh, *Making Online Learning Accessible: Using Technology to Declutter the Web*, *Intervention in School and Clinic*, 45(5): 304-311.

<sup>5</sup> Buffington, M.L. (2008). *Creating and Consuming Web 2.0 in Art Education*, *Computers in the Schools*, 25(3): 303-313.

<sup>6</sup> Burke, S. and J. Oomen-Early (2008), *That's Blog Worthy: Ten Ways to Integrate Blogging into the Health Education Classroom*, *American Journal of Health Education*, 39(6): 362-364.

<sup>7</sup> Desmet, C. (2009), *Teaching Shakespeare with YouTube*, *English Journal*, 99(1): 65-70.

<sup>8</sup> Iktepe, C.H. (2009), *Writing for Real Purpose*, *Learning & Leading with Technology*, 36(7): 36-37.



In fact, education leaders tell us that today's school websites perform a wide array of essential educational functions including:

- Providing access to digital learning resources and support the district's digital learning strategies (81%)
- Increasing out-of-school learning with 24/7 access to classroom information and educational resources (75%)
- Sharing relevant and timely information about district and school initiatives (95%)
- Increasing access to district information and data; enhancing transparency (94%)
- Strengthening parent engagement (85%)
- Making it possible for district leaders to communicate quickly and efficiently in times of crisis (79%)
- Leveling the playing field, providing all students, educators, and parents with easy access to twenty-first century tools and resources (61%)

### C. About the Survey Data

Through more than a decade of directly serving and partnering with educators, Schoolwires has made it a point to thoroughly understand the needs of the customers it serves. It also believes that when it comes to E-rate reform, the voices of school districts, individual schools, administrators and teachers are among the most valuable. For these reasons, Schoolwires surveyed its customers regarding E-rate modernization in 2010 and then, building upon the earlier survey results, again in 2013. 208 education leaders representing their districts responded to the company's 2013 survey; 218 responded to the 2010 survey. Schoolwires offers its recommendations based upon the clear themes that have emerged from its school district survey data.

Within these comments, Schoolwires also presents data from the **Speak Up National Research Project** conducted by Project Tomorrow. Project Tomorrow is a national education nonprofit organization with a 16 year history of impacting education and changing the lives of children through science, math and technology education.<sup>9</sup> The Speak Up Research Project data aligns closely with the Schoolwires survey data upon which our recommendations are based.

From the survey results, it is clear that education leaders support the Commission's goals of streamlining the E-rate program and making it simpler to apply for funding, while ensuring program integrity and compliance. Educators are concerned, however, that any plan to phase out

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<sup>9</sup> Speak Up was started in 2003 as an outcome of a national AmeriCorps program. The first Speak Up online surveys were funded by a small grant from the US Department of Education, which was interested in infusing some student views into its National Education Technology Plan. Subsequently, additional Speak Up surveys were developed to provide opportunities for teachers, librarians, technology coordinators, administrators, parents and pre-service teachers to share their voices as well. Since 2003, over 2.6 million online surveys have been submitted through Speak Up. These represent the largest collection of authentic, unfiltered stakeholder input on education, technology, twenty-first century skills, schools of the future and science instruction.

Each spring, Project Tomorrow creates national reports on the aggregated US survey data. The US national reports are released in a series of Congressional Briefings in Washington DC and through numerous conference presentations, webinars and meetings with federal agencies, state education agencies, associations, organizations, research groups, think tanks, business groups, and policy organizations throughout the year.

E-rate funding for web hosting would have a profoundly negative effect on their school districts and the constituents that they serve. Further, it would contravene the very purpose and goals of the ConnectED initiative.<sup>10</sup> A reliable and secure web hosting service is a requirement for school districts to expand digital learning and broadband adoption. Many school districts, especially rural and urban school districts that have the fewest economic resources and the greatest need for the benefits delivered by modern school websites, will be forced to find funding for web hosting from other areas of their already strained budgets if E-rate support is withdrawn. Any shift of school district resources will affect students, either directly, through cuts to supplemental educational programs, or indirectly through cuts in other areas. Some districts have indicated to Schoolwires that these cuts could be in the form of staff reduction or elimination of academic programs. “Providing reliable, secure and ongoing communications with our constituents is critical to the success of our district and our students,” says Wayde B. Byard, Public Information Office, Loudoun County Public Schools. “And the avenue for these communications is our portal supported by off-site hosting.”

## **II. RECOMMENDATIONS**

Schoolwires offers the following recommendations based on the survey responses from hundreds of education leaders.

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<sup>10</sup> Press Release, The White House, President Obama Unveils ConnectED Initiative to Bring America’s Students into Digital Age (June 6, 2013) (available at <http://www.whitehouse.gov/the-press-office/2013/06/06/president-obama-unveils-connected-initiative-bring-america-s-students-di>).

**A. Streamline the E-rate Program and its Application Processes – Maximizing Fairness, Flexibility and Competitive Choice for Participants While Continuing to Ensure Program Integrity**

The districts and educators Schoolwires serves support reforms that will streamline administrative processes but at the same time, they are concerned that many of the proposed changes would actually complicate the bidding process and increase administrative burdens.

**1. Streamline the Application Process by Allowing Multi-year 471 Forms**

Schoolwires and 99% of the school districts it surveyed support allowing E-rate applicants with multi-year contracts that are no more than three years in length to file a single FCC Form 471 application for the funding year in which the contract commences, and to go through the full review process just one time for each such multi-year contract. Survey respondents agree with the proposed reform because there is no compelling reason to require schools and libraries with limited resources to reapply each year under the same contract for the same services. This reform would significantly reduce administrative costs without any appreciable increase in the potential for waste, fraud, or abuse.

**2. Streamline the Competitive Bidding Process**

Schoolwires' school district partners support streamlining the competitive bidding process for E-rate funds. A full 96% of survey respondents agree that competitive bidding for all funding requests must be fair and open and comply with all state and local procurement regulations. The same number support a rule change that would permit small funding requests (under \$10,000) to be subject to a streamlined process, *i.e.*, such contracts would not be subject to newly proposed requirements to submit bidding documents or comply with Federal bidding regulations (all state and local procurement laws would still apply). This exception would be especially meaningful to rural school districts, which have great need for the services delivered

through the E-rate program and yet must bear disproportionately high administrative and E-rate consultant-related costs because of the relatively small funding levels they receive through the program.

80% of survey respondents oppose requiring applicants to submit all competitive bidding documents (*i.e.*, a copy of each bid received, the bid evaluation criteria, bid sheets, a list of people who evaluated bids, memos, board minutes, or similar documents, all bids for E-rate supported services, all purchase prices and all correspondence with vendors during the bidding, evaluation, and award phase of the process) and extending document retention requirements from five to ten years. These proposed changes would place significant additional burdens on schools and libraries.

In order to create a more streamlined process, bidding requirements should be applied equally to all applicants, including service providers applying pursuant to state master services agreements (“MSAs”) or, alternatively, make the streamlined MSA process open to all service providers. In addition, school districts should be permitted to use the competitive bidding process to purchase services that are not on an MSA list unless impermissible under state law. This would maximize the competitive choices available to E-rate participants.

### **3. Avoid Other Administrative Changes that Increase Burdens**

The majority of school districts surveyed by Schoolwires oppose proposals that would increase the burdens on applicants, such as requiring E-rate applicants to implement dedicated equipment to monitor network performance, which would result in significant administrative burdens and new costs. Participation in the E-rate program already entails significant administrative burdens, especially for small schools, and the school districts are very concerned

about adding more to this burden. Program participants seek as light of an administrative burden as possible while embracing efforts to ensure accountability and program integrity. Nearly 60% of the responding schools said they would consider withdrawing from participation in the E-rate program if administrative burdens continue to grow and become too great.

**B. Invest in the Communications Infrastructure that Educators Prioritize as Critical, Including Services that Drive Engagement and Support Next Generation Digital Learning**

**1. Educators Share Their Tech Priorities**

Schoolwires and its school district customers believe that the E-rate program is, and should continue to be, a vital driving force in bringing the benefits of twenty-first century connectivity to classrooms and libraries throughout the nation. Teachers, administrators, information technology staff, and even students and parents, recognize that high-capacity broadband works hand in hand with the school's online infrastructure (*i.e.*, its website system) to facilitate community engagement and successful digital learning initiatives. Both are necessary for success. The key next steps for the E-rate program should be to expand the reach of high-capacity broadband while continuing to support services such as web hosting that enable access to information, improve engagement, support digital learning objectives, and connect schools to the students, parents and community members that they serve.

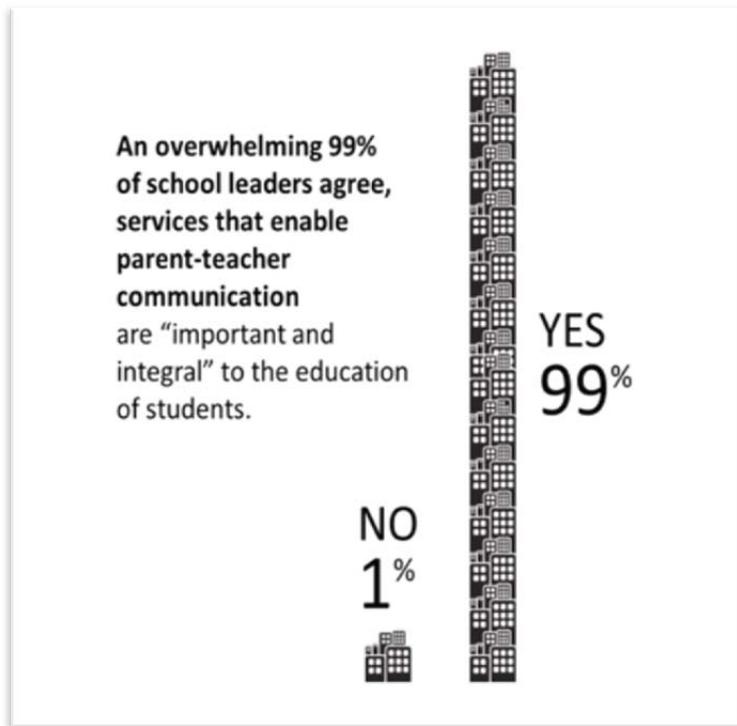
**2. Education Leaders Support New Funding for High-Capacity Broadband**

Educators and policy leaders agree: high-capacity broadband is crucial to next generation digital learning. This is why 97% of the educational leaders surveyed by Schoolwires support the addition of new funding for initiatives aimed at expanding access to broadband for schools and libraries. They know that the ability of students, teachers, and educators to communicate

and engage in digital learning depends on access to high-speed connections. As the number and scope of online services and digital learning opportunities grow, so too must bandwidth.

### **3. Education Leaders Support Continued Funding for Web Hosting Services**

As one educator wrote, in a testimonial typical of those provided to Schoolwires, “[t]he ability for my staff to communicate with students and parents is invaluable. The E-rate program on web hosting has made this possible.” “In today’s world,” another wrote, “over 90% of parents are using the [*sic*] web communication to the district, school, and classroom teachers. Web communication has become our parents [*sic*] #1 form of communication.” According to 2012 data published by the Speak Up National Research Project, 76% of technology leaders and 53% of educational administrators said that school and district websites are the most effective way of communicating with parents. Because of its critical importance, 100% of Schoolwires survey respondents indicated that “web hosting should remain funded within the E-rate program as a Priority 1 service”.



**a. Web Hosting Services Perform Critical Educational Functions**

The NPRM asks for comments regarding the possibility of phasing out E-rate support for web hosting. Specifically, it asks:

Should the E-rate fund should be supporting services such as web hosting and email at costly monthly rates when many such services are cloud based and offered basically for free to other users? Is there any continuing and compelling policy reason to continue to fund such services?<sup>11</sup>

Education-focused web hosting services are an integral component of modern school district operation — connecting students, parents, teachers, and administrators in critical ways that cannot be replaced by free services. Today’s web hosting touches almost every aspect of school communication — from access to digital learning resources and scheduling information to emergency alert notifications. Along with other compelling policy reasons to continue funding

<sup>11</sup> NPRM at 97.

web hosting services, cutting E-rate support for web hosting would have an immediate, dramatic, and detrimental impact on schools' ability to communicate with students and parents.

Today's school websites enable stakeholders to access the information, resources and people that are integral to their success. A full 98% of survey respondents tell us their district, school, and classroom websites perform critical educational functions. According to 2012 data published by the Speak Up National Research Project, 43% of educational administrators say that school portals and websites hold the greatest potential for increasing student achievement and success (up from 18% in 2007).

Clearly, web hosting has moved far beyond the early, static web pages offered when E-rate support was first authorized as a Priority 1 service in 2003. Because of this, 96% of respondents tell us that their web presence is more important now than it was in 2003 when the service was added to the ESL. And 94% of respondents indicate that the E-rate supported web hosting services increase the ease of access to district information and secure access to data. Web hosting services are anything but outdated.

As one educator reported, “[i]n 2003, the website was used to show pictures and post events. Now... more content is being developed and delivered digitally through websites.” Another wrote that “[w]e are just beginning to use the many tools available to us via our service that allow students to collaborate, expand reading and writing skills, and practice 21st century skills.”

Nearly all respondents (99%) report that such services are “important and integral to the education of students”. The communication capabilities provided by today's web hosting services allow parents to stay engaged with teachers, assignments and classroom activities at home. Educators responding to the survey report that a full-featured school web site provides a

“[g]ood easy source for parents to obtain information and communicate concerns with staff/teachers.”

**b. Web Hosting Services Facilitate Blended Learning Opportunities**

Today’s school websites serve as critical access points for digital content, course-specific information and interactive two-way collaboration. In a twenty-first century classroom, digital content and online collaboration can be as much a part of learning as traditional textbooks and classroom instruction. School web hosting services expand learning time and provide the safe, secure access points and collaboration capabilities that are required to support twenty-first century blended learning and digital learning initiatives.

Teachers confirm that access to technology in the classroom yields positive effects on students learning. In a survey completed by the Riley College of Education and Leadership, teachers consistently reported that technology engages many types of students regardless of learning style, language barriers and academic needs.<sup>12</sup> As Arne Duncan, U.S. Secretary of Education has stated, “students must be fully engaged. This requires the use of technology tools and resources, involvement with interesting and relevant projects... [E]ducators must be given and be prepared to use technology tools; they must be collaborators in learning constantly seeking knowledge and acquiring new skills along with their students.”<sup>13</sup> Web hosting services enable the kind of collaborative mutual learning that Secretary Duncan referenced.

According to 81% of survey respondents, school websites are key access points for digital learning resources. 75% of survey respondents indicate that school websites increase out-

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<sup>12</sup> Educators, Technology and 21<sup>st</sup> Century Skills: Dispelling Five Myths: A Study on the Connection Between K-12 Technology Use and 21<sup>st</sup> Century Skills, The Richard W. Riley College of Education and Leadership, Walden University, PRNewswire, June, 2010, p. 14, available at: [http://www.waldenu.edu/Documents/Degree-Programs/Full\\_Report\\_-\\_Dispelling\\_Five\\_Myths.pdf](http://www.waldenu.edu/Documents/Degree-Programs/Full_Report_-_Dispelling_Five_Myths.pdf) (last visited July 8, 2010).

<sup>13</sup> *Id.* at 5.

of-school learning time by providing students and parents with 24/7 access to classroom information and supplemental educational resources. As one educator reported, the school's website "[c]onnects parents and students to enrichment and intervention materials."

The encouraging news is that teachers are increasingly using technology to offer interactive and collaborative learning experiences and to extend learning opportunities beyond the classroom. Web hosting provides the access to this technology. If the Commission eliminates web hosting as an E-rate eligible service, teachers and their students may lose access to the ability to use these learning tools. Web hosting service is a foundation for the use of these learning tools and is therefore, without a doubt, integral, immediate and proximate to the education of students.

**c. Web Hosting Services Strengthen Parental Involvement and Community Engagement**

According to educational leaders, school websites provide the #1 means of communicating and engaging with parents and the community. Data published by the Speak Up National Research Project substantiates this finding. According to 2012 Speak Up research data, educational administrators and technology leaders both identified school websites as the primary technology they rely upon to communicate with parents (tied only with voice notification services). Earlier Speak Up reports show that parents also strongly agree. In fact, 60% of parents ranked schools websites as their top choice for driving student achievement, providing direct access to information and to their children's teachers.<sup>14</sup>

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<sup>14</sup> Project Tomorrow, *Creating Our Future: Students Speak Up about their Vision for 21st Century Learning*, Speak Up 2009 National Findings, K-12 Students & Parents, March 2010.

This topic is vitally important because, as nearly all school leaders are keenly aware, increased parental involvement leads to improved student achievement.<sup>15</sup>

The communication facilitated by web hosting can be as broad as district-wide announcements sent directly to the family of each student, or as targeted as personalized homepages that provide parents with easy access to everything from schedules to assignments to intervention materials to notifications tailored for the needs of their particular children.

Among the responding schools, 95% use web hosting to provide a cost-effective mechanism for sharing relevant and timely information about district and school initiatives with community members.

**d. Web Hosting Services Drive Broadband Adoption**

Students and parents will only take advantage of high-speed broadband connections to schools if they have access to the educational, communication and engagement capabilities that are provided by easy-to-use, school-focused web hosting services. Broadband, by itself, does not provide that.

On June 13, 2013, the Leading Education by Advancing Digital (LEAD) Commission released a five-point blueprint outlining specific actions to accelerate the expansion of digital learning in K-12 education in the United States.<sup>16</sup> One of its major recommendations is to accelerate the adoption of digital curriculum, a laudable goal that can only be achieved by supporting the adoption of systems that provide students and teachers with access to digital

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<sup>15</sup> One hundred percent of the research studies compiled by The Parent Institute\* indicate that parent involvement has a significant impact on student success. The statistics show that with as little as a one-third increase in parent participation, school achievement scores increase dramatically. It only takes a small increase in parent input to see measurable results in student output. See <http://www.parent-institute.com/educator/about/>

content. Today’s web hosting services play a critical part in this effort, as school districts across the nation already know.

Further, school and district websites are the number one method school leaders rely upon to communicate with their community members — including parents, parent organizations, taxpayers, businesses, and other community-based organizations — to obtain their input and engagement with district initiatives, needs and priorities. School leaders use their websites as vital tools to gain support for and adoption of district technology initiatives — including broadband technology initiatives.

e. **Web Hosting Services Are Essential for Student Safety, Student Health and Crisis Communication**

Student safety is an essential responsibility of school districts. Not only do school districts rely on their websites to make vital information about school closings and weather-related schedule changes available to parents, but school districts depend on website tools to provide information about health and safety emergencies to parents and students on an immediate basis. Web hosting services allow schools to rapidly communicate with students and parents in times of crisis including when school lock-downs or evacuations are necessary due to natural disasters or other emergencies (gas leaks, power outages, and meningitis outbreaks, for example) that jeopardize student health and safety. Today’s methods are much more efficient than yesterday’s means, which included tickers on local television news, radio announcements and time-consuming telephone call down lists. This is why 79% of school leaders tell us that they use school websites to communicate quickly and effectively during times of crisis. As one educator wrote, web hosting “can be the only form of communication on a timely basis.”

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<sup>16</sup> “Paving a Path Forward for Digital Learning in the United States” (*available at* <http://www.leadcommission.org/sites/default/files/LEAD%20Commission%20Blueprint.pdf>).

Another reported that among the benefits of the school's web site is that it "provides direct messaging for any crisis situations that may occur."

April Bryant, another commenter in this proceeding, provides an example of the need for this type of communication: "On September 19th, 2012, our district went into a lock down due to a very real threat against our schools. We were able to mass communicate quickly via our website and keep parents up to date during a very scary time."<sup>17</sup>

**f. Web Hosting Services Are Environmentally Friendly**

97% percent of respondents to the 2010 Schoolwires survey indicated that school websites increase efficiency and reduce the time, effort, and waste associated with printing. As evidenced by the survey data, the contribution of paperless learning to global green efforts is clear. The ability of teachers and school district administrators to use school web hosting services to post material (from announcements to homework assignments) dramatically cuts down on the paper, ink, postage, and electricity necessary to produce hard copy mailings and handouts. While this benefit may be an ancillary consideration in this proceeding, its value should not be overlooked by the Commission.

**4. Free Web Hosting Services Are Unacceptable for Most Schools**

The Commission asks whether services that are "offered basically for free" can replace the web hosting services currently supported by E-rate.<sup>18</sup> The answer is, in the experience of school districts and educators across the nation, unequivocally "no." "Free" website services are not viable for schools due to the overwhelming number of concerns cited by school leaders.

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<sup>17</sup> *In Re Modernizing the E-rate Program for Schools and Libraries*, Comments of April Bryant, Community Relations Specialist, WC Docket No. 13-184 (filed Aug. 19, 2013).

<sup>18</sup> NPRM at 97.

As the survey results indicate, 80% of respondents indicated that “[f]ree website services are not tailored to meet the needs of educational entities, nor do they provide the specialized tools needed to create and maintain the site.” 80% of respondents also believe that free web hosting services are inferior because they have a “[l]ack of awareness and compliance with industry-specific regulations such as FERPA, CIPA and Section 508.” Administrators understand their district’s requirements and the benefits of school website hosting services. As one administrator wrote, “[o]ur web service has enabled our district to provide digital learning tools for our students and staff in a centralized, secure manner rather than having teachers use a hodgepodge of outside resources with no control or consistency.”

As one educator wrote, “[t]hese [free] systems are not built with the needs of school district communication in mind.” For this reason, 71% of schools surveyed reported that free web services are not sufficient for enterprise-level use. As one respondent wrote, “it is imperative that we have a STABLE and CONSISTENT tool in which to share information that relates to the educational environment for our children. Nothing less is acceptable.” (emphasis in original).

**a. Free Sites Are Not Dependable Over the Long Term**

Another reason school districts are loath to adopt free web services is that schools have no guarantee that free web services will continue to operate, and have no recourse if service ends or is scaled back. A full 85% of survey respondents report that the use of free web hosting services is problematic because “[f]ree website services can be eliminated or otherwise canceled at any time by the provider.”

**b. Free Sites Lack the Specialized Capabilities Needed for Education**

A school's web presence is vital. It would be inappropriate to ask schools to rely upon services with which they have no negotiating power with respect to such critical issues as capabilities, legal terms and user permissions. This is why 80% of survey respondents believe that free web services do not provide the hosting infrastructure and specialized capabilities necessary to create and maintain modern school websites.

**c. Free Sites Lack Adequate Security and Privacy**

The Commission should not ask schools to rely on the security and privacy policies of free web services, which may be changed at any time and perhaps without notice, to protect their students' information when the school cannot negotiate these policies. Schools deal with very sensitive information and communicate with parents about students' health issues, custodial arrangements, grades, and other personal issues. 74% percent of the school districts that Schoolwires surveyed were concerned that "[l]egal terms and privacy policies for free website services could change at any time." As one respondent wrote:

The security of having a great host for our site as well as great customer service for issues is vital for a district our size. Case in point, we used our website this year for our online registration process that would not be possible with a free website. We have used free websites in the past and it has caused major problems during emergencies like weather alerts. Free websites are not the way to go."

As another education technology specialist has commented in this proceeding, "[a]ccess to free website builders is available, but [reliance on] the security of those sites with our data and sensitive student information would not be wise."<sup>19</sup>

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<sup>19</sup> *Modernizing the E-rate Program for Schools and Libraries*, Comments of Krissy Machamer, Media Specialist and Technology Integration Coach, Maysville Local Schools, WC Docket No. 13-184 (filed August 23, 2013).

According to education leaders, therefore, free website services are not safe and not viable for use by their school districts.

## **5. School Web Hosting Services Deliver High Value at an Extremely Low Cost**

The NPRM asks for comment on whether the Commission should phase out funding for web hosting as part of an effort to end support for outdated services and, presumably, re-purpose this funding to support high-capacity broadband access. Opponents to the E-rate eligibility of web hosting services inaccurately imply these services are unnecessary and represent an inefficient use of E-rate funds.<sup>20</sup> These assertions are erroneous and shortsighted, not only because of the critical role web hosting services play in school districts across the country, but also because these services are remarkably cost effective — especially in light of the infrastructure costs required to deliver them. For instance, enterprise-class privacy, security, availability during emergencies, and standards are critical requirements for school districts. Because of the quickly growing trend for school districts to use the website as a vehicle to communicate, collaborate and engage with the community and stakeholders, extremely high volumes of user traffic are managed. This significant level of utilization requires a dedicated and specialized infrastructure to ensure scalability, performance and reliability standards. Companies such as Schoolwires provide a centrally managed enterprise-level hosting infrastructure with secure data and facilities protection that are continually monitored. School districts are subject to privacy requirements and must maintain a secure environment for data regarding their schools, students and families. Access to a school district's data is limited, protected and audited, unlike

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<sup>20</sup> See SECA 2010 ESL Public Notice Reply Comments at 3. SECA claims that K-12 web hosting vendors are charging fees for eligible web hosting features that are significantly higher than web hosting fees charged in other market sectors. SECA 2010 ESL Public Notice Comments at 15-16.

the services that are offered by other commercial webhosting companies such as Go Daddy, Yahoo!, Register.com and Network Solutions.

Despite the stringent requirements, school web hosting services are remarkably cost effective.<sup>21</sup> The \$28 million spent on web hosting is only 1% of the total E-rate spending each year, yet making content accessible to schools, parents and students is a powerful driver of broadband demand and adoption, long term goals of this Commission as well as the President's ConnectEd initiative. E-rate support for web hosting advances both goals. School website hosting services deliver high value at an extremely low cost.

#### **6. Schools and Students Will Suffer if Web Hosting Is De-Prioritized or Removed from the ESL**

If, despite these powerful testimonials from schools, the Commission phases out E-rate support for web hosting, school districts and the communities they serve will be harmed and broadband adoption undermined. Many school districts, especially rural and urban school districts that have the fewest economic resources and the greatest need for the benefits delivered by modern school websites, will be forced to find funding for web hosting from other areas of their existing, limited budgets if E-rate support is withdrawn. Any shift of school district resources will certainly affect students, either directly, through cuts to supplemental educational programs, or indirectly, through cuts in other areas. Some districts have indicated to Schoolwires that these cuts could be in the form of staff reduction or elimination of academic programs.

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<sup>21</sup> For example, Loudoun County Public Schools in Virginia, which has 87 schools, receives approximately \$39,610 for E-rate for web hosting services. This translates to approximately \$450 per school on an annual basis, or \$38 per school on a monthly basis. Drilling down further, it is about 2/10 cents per student per day — less than the price of a packet of ketchup.

Moreover, if districts were forced to eliminate web hosting services, other hardships would result. One educator told Schoolwires that “Our main form of community information is through our website. Elimination of E-rate funding for our website would result in financial hardships for our school/IT staff and eliminate our main source of school-to-home communication.” School districts will need to hire additional IT staff to create “homemade” websites. One educator described a typical predicament: “[w]e have a very small technology staff. Schoolwires enables us to have a portal that's easy for our staff to use. More complicated options would be very time consuming requiring time and staff that we don't have.” Another writes of paid web hosting:

They provide a solid location for overall communications about the schools and district. The sites are an extension of the school something that a free hosted base solution would not offer. Parents know and expect the schools to keep sites up to date and [...] use it as a primary resource for information. *If funding was cut it would put more demand on IT departments to add web servers, maintain them and also require a Full [sic] time webmaster to keep sites up to date...* I have been a Technology Director for 13 years and [have] been on both sides of this. I can assure you if they cut funding we are moving backwards in what we have now. (emphasis added).

School districts simply cannot afford to lose E-rate support for web hosting services. If they do, budget cuts to other programs or compromised communication with parents will be the unavoidable result.

### **III. IMPLEMENT PROGRAM CHANGES IN A MANNER THAT CAREFULLY CONSIDERS UNINTENDED IMPACTS AND MINIMIZES HARDSHIPS FOR SCHOOLS AND LIBRARIES**

Given the number and scope of the questions raised in the NPRM, Schoolwires encourages the Commission not to rush to action, but rather, to listen to all stakeholders, seek to understand the implications of potential decisions, and do as much as it can to avoid unintended consequences. Schoolwires and the school districts it serves are convinced that web hosting is a

critical component of the modern school system, and a necessary part of broadband adoption. Indeed, today's education-focused web hosting services are the very antithesis of an "outdated" service.

However, neither Schoolwires nor these school districts oppose reducing E-rate support for those services that truly are outdated. Only 25% of the school districts Schoolwires surveyed oppose phasing out support for paging services; only 31% oppose phasing out directory assistance; and only 29% oppose phasing out dial-up Internet service. However, in the case of these outdated services, the Commission should not impose flash cuts, and should not de-fund categories in 2014-15 other than those under consideration in the current ESL.

In addition, even though paging services, directory assistance, and dial-up Internet service may be deemed as outdated, school districts may be bound to multi-year contracts that lock them into specific arrangements and pricing. To make significant changes E-rate rules mid-contract after the school relied on existing Commission rules would provide insufficient notice. The Commission should therefore only impose rules on new contracts executed after new rules come into effect. Further, the Commission should phase in any de-funding over a 36-month period beginning in 2015-16 to minimize hardship and give schools time to identify alternative funding sources should they feel compelled to maintain the service.

## **CONCLUSION**

Based on feedback from education leaders, Schoolwires makes three primary recommendations:

- 1) Streamline program administration and competitive bidding processes so that schools and libraries can participate in E-rate with as light an administrative burden as possible while continuing to ensure program integrity.

- 2) Invest in the communications infrastructure that educators prioritize as critical, including services that drive engagement and support next generation digital learning. Specifically:
  - a) Support high-capacity broadband which can help set the stage for successful digital learning initiatives;
  - b) Maintain Priority 1 funding for web hosting services, which school leaders tell us meet critical educational, administrative and communications needs within their district communities; and
- 3) Carefully design program changes to minimize unintended hardships on schools, libraries and the students, parents, teachers and community members who currently benefit from eligible services today. For example, avoid “flash cuts” to any service that is removed from the eligible services list as it is updated.

Based upon our survey results, we want to emphasize that eliminating web hosting as an eligible E-rate service will have a profound impact on the ability of school districts to address the academic and strategic imperatives that are critical to the success of each and every student they serve. This is counter to the goals established by this Commission, the current administration and the ConnectED initiative.

For the foregoing reasons, Schoolwires asks the Commission not to phase out E-rate support for web hosting, but to proceed with reforms that will streamline the E-rate program without adding undo administrative burdens to the schools and libraries who participate in it.

Schoolwires and the school districts it supports appreciate this opportunity to comment on the Commission’s proposals for E-rate, and look forward to an ongoing dialogue about how best to modernize this important and successful program.

Respectfully submitted,



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