

NORTH SLOPE BOROUGH SCHOOL DISTRICT



Nunamiut Wolves

Nunamiut School
P.O. Box 21029
Anaktuvuk Pass,
Alaska 99721
(909) 661-3226
FAX (907) 661-6215

September 12, 2013

Atkasuk Eagles

Meade River School
Atkasuk, Alaska 99791
(907) 633-6315
FAX (907) 633-6215

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

Barrow Whalers

Barrow High School
P.O. Box 960
Barrow, Alaska 99723
(907) 852-8950
FAX (907) 852-8969

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. We appreciate your support for the E-Rate program as it provides critical discounts for the North Slope Borough School District to obtain affordable telecommunications and internet access.

HMS Wolves

Eben Hopson, Sr.,
Memorial Middle School
P.O. Box 509
Barrow, Alaska 99723
(907) 852-3880
FAX (907) 852-7794

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 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 needed for current demand.

Arctic Foxes

Fred Ipalook
Elementary School
P.O. Box 450
Barrow, Alaska 99723
(907) 852-4711
FAX (907) 852-4713

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. We strongly support the FCC's subsequent decision to index E-Rate funding to inflation.

Kaveoook Rams

Harold Kaveoook School
P.O. Box 10
Kaktovik, Alaska 99747
(907) 640-6626
FAX (907) 640-6315

The North Slope Borough School District supports streamlining the E-Rate application process so as to minimize the administrative burden. The annual paper trail and process burdens our district as it takes away from work that should be focused on educating our children.

Nuiqsut Trappers

Trapper School
General Delivery
Nuiqsut, Alaska 99789
(907) 480-6712
FAX (907) 480-6621

Tikiqag Harpooners

Tikiqag School
P.O. Box 148
Point Hope, Alaska 99766
(907) 368-2262/2263
FAX (907) 368-2770

Kali Qavviit

Kali School
P.O. Box 59077
Point Lay, Alaska 99759
(907) 833-2311
FAX (907) 833-2315

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

Alak Huskies

Alak School
P.O. Box 10
Wainwright, Alaska 99782
(907) 763-2541
FAX (907) 763-2550

Box 455 Barrow, Alaska 99723 (907) 852-4710 Fax (907) 852-9760

on, a program that must continue to provide funding critical for telecommunications and connectivity.

The North Slope Borough School District would be impacted negatively if the NPRM's proposal to calculate discount rates at the district level rather than using the weighted average for each school building. This will help ensure that E-Rate discounts are targeted to the right school populations without penalizing school districts based on size.

School Districts should remain in control of deciding which services to purchase through E-Rate. When it comes to implementing any federal policy or program, it is imperative that the overseeing agency recognize that what works in one district will often not always work in another district, even if identical. Flexibility is the best way to strike a balance between meeting federal goals and recognizing the unique opportunities and obstacles in each school and community. Flexibility allows our school to use their E-Rate funding in the way that leverages the most access we can obtain in the context of our broader education and technology goals.

We oppose per-student based funding because it fails to recognize high-cost service factors that impact rural and small schools. The North Slope Borough School District encompasses 89,000 square miles of wide-open territory that is dominated by tundra and wilderness. The district is bordered by the Arctic Ocean to the North and the Brooks Range to the South. The NSBSD is the largest geographic school district within the United States, only ten States are larger geographically. The district serves 1,891 students (PreK3 to 12) in 11 schools in 8 remote villages, none of which are connected by the road system.

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,


Peggy Cowan
Superintendent

Ltr 14-13