

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of Modernizing the E-rate Program for Schools & Libraries
WC Docket No. 13-184

COMMENTS BY:

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RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING:

I am writing to provide Comments to the FCC on the E-Rate NPRM, proceeding 13-184. The E-Rate has been of great importance to my school, Amy Biehl Charter High School, because it has helped our students and teachers gain access to a wealth of online resources, to communicate and collaborate, and to develop the 21st century skills necessary for college and career. However, E-Rate funding levels have not kept pace with my school's current & future bandwidth needs. I urge you to consider raising the E-rate funding level to at least \$5 billion per year, which is close to the average demand level for each of the past two years.

As a Technical Director for my school in New Mexico, I know that seamlessly infusing digital learning throughout the school curriculum is a pre-requisite for students to graduate from high school with the skills and knowledge they need to succeed in today's global economy. Access to high speed broadband is the key for modern teaching and learning to occur in all schools across the country.

In my school we use digital learning to personalize learning, allow for online research and instructional materials, provide online classes, meet common core state standards, and administer online assessments. The online assessments that our state will require for PARCC testing in 2015 will probably mean that our school will need to upgrade our internet bandwidth at a greater cost to the school. Our school's network is currently just keeping up with demand, and the need for a high speed reliable network is only going to increase in the near future.

The E-rate program has been a phenomenal success in bringing Internet access to almost every classroom in America. In the last funding cycle applications from schools and libraries totaled more than \$5 billion, more than double the available funding. I respectfully urge the FCC to increase funding for the E-Rate program to at least \$5 billion to meet this demand. All students need access to high speed broadband. Our nation's future depends on their success.

As a small charter school the process of applying for E-Rate funds in 2011 for the first time in years and actually receiving funds for our internet and phone services was a great financial relief to the school. But the process of applying for funds, drafting a RFP, review quotes and then more paperwork was almost overwhelming for our limited staff. It was almost to the point of not being cost effective to put in that much labor to get the funds. I know this is true for many small charter schools in New Mexico (and perhaps all across the country). Many charter schools here do not have the staff or technical resources to go through the application processes due to the amount of time to devote to the tedious paperwork. And thus many charter schools do not bother to apply for E-Rate.

I would hope the revisions to the E-Rate program would help streamline this process for all schools and libraries. It seems to me that the current process is too bureaucratic and time consuming for most schools. I know it is also that for our current small Internet and phone provider who almost didn't want to bother with being an E-Rate provider due to the paperwork and accounting demands.

In Section 5 of the NRPM there are some good proposals for streamlining the process: better electronic filing, invoicing, disbursement processes, etc. But in Section IV it seems though that some other of the proposed changes in the NPRM would at the same time make the E-Rate more complex for both applicants and USAC. These deal with maximizing cost effectiveness of funds, additional data requirements, disclosures, extended record retentions. These seem like a step backwards in trying to update the E-Rate system and should be changed.

Another comment is in regard to the reimbursement process for Internet and phone services. Currently for us the reimbursements from USAC go to our provider and then the provider pays us. That seems way too cumbersome and means extra paperwork and accounting for both our provider and for us. The reimbursements should come directly to the school.

Thanks for your consideration in regards to these comments.

Sincerely, Mario De la Huerga

Technical Director, Amy Biehl Charter High School