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To: Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington D.C.

From: Colorado Mountain College  
802 Grand Avenue  
Glenwood Springs, CO 81601

Commissioners,

Thank you for the opportunity extended by the Federal Communications Commission to provide our feedback on WC Docket No. 13-184, *Modernizing the E-rate Program for Schools and Libraries*. We are submitting this letter to recommend that rural community colleges be eligible to participate in the E-Rate 2.0 program. Rural community colleges are critical linking pins to educational opportunity and economic development throughout rural America. Yet, these institutions are at a critical disadvantage when it comes to offering students access to high-speed internet, which is not consistently available throughout much of the country where these colleges are located and, when internet access is available, it typically is at prices which far exceed those available to metropolitan colleges. Specifically, we at Colorado Mountain College would like to request that the agency use its authority to expand the definition of schools and libraries to include rural community colleges.

Increasingly, the line between educational services offered at a high school and those available at a community college is becoming less stark. Through extensive dual-enrollment programs offered to high school students seeking post-secondary credits before their formal entrance into a university and through the considerable numbers of academic remediation programs available at community colleges everywhere, the comprehensive, two-year community college of today is in many ways an extension of secondary education. In addition to offering educational programs that enhance the high school experience and classes aimed at assisting those who graduated but are not college-ready, the majority of community colleges also offer such programs as General Educational Development (GED), English as a Second Language (ESL) and other basic education services that are designed for students who may not intend to pursue a community college certificate or associate degree. These programs provide basic skills that prepare students for jobs and, in many cases, provide individuals with the possibility of pursuing a higher education.

Unfortunately, even though these educational services are vitally important to the economic development of the nation, community colleges are invariably funded with substantially lower appropriations than primary and secondary schools. Likewise, they do not garner nearly the level of state and federal funding that universities enjoy. This is particularly problematic for rural community colleges, whose lower enrollments and higher costs can impede the provision of opportune service levels.

Each year at Colorado Mountain College (CMC), approximately 1,000 high school students lay the foundation for their future through dual-enrollment coursework, earning college credit as part of their high school education. Roughly 850 individuals pursue the dream of a high school diploma through the college's GED program. Nearly 2,000 individuals each year learn English here as CMC is the largest provider of English as a Second Language

courses within the state of Colorado. Additionally, 10,500 students, both first-time students and those returning to higher education for new job skills training, enroll in degree or certificate programs. Our ability to integrate these learners into the growing information-based economy is vital to their future career success and the economic success of our region.

Colorado Mountain College is the only degree-granting institution in a service district that spans across 12,000 square miles of rugged alpine terrain within the majestic Rocky Mountains. Traveling within this area can be quite challenging as the north central part of the state is rural, endures long snowy winters, and can, in places, lack infrastructure. CMC plays a vitally important role in the state by making higher education accessible and affordable for residents of its rural service area who are often place-bound and would not otherwise be able to regularly travel well over one hundred miles to the closest university. Furthermore, with the limited capabilities for broadband in our communities distance learning is not a reliable option and, at times, it is not even a viable one. After hearing numerous stories of working individuals, many with small children at home, who could not pursue a bachelor's degree because of the arduous and time-consuming travel required to attend a college on the Front Range, near the metropolitan area of Denver, CMC began offering a limited number of baccalaureate degrees.

As an institution, we grapple with the lack of adequate broadband capabilities that exists in this sparsely populated but extensive part of the country. Given the mountainous geography and rural nature of our district, it is highly challenging and very expensive to provide high-speed internet access for our students. One of our campuses, our Spring Valley Campus, is located nine miles outside any urban center and three miles from any highway. Roughly 1,300 students attend classes at this residential campus. Over the last several years the college has investigated the possibility of upgrading from copper to fiber optic cable. We have approached all major providers. The telecommunication providers have expressed concern over the extreme difficulty and high cost involved in laying fiber optic cable to this campus; the lowest estimate was a minimum cost of \$500,000 for this one campus alone. If the college had contracted with the telecommunications provider to install fiber to the campus location, the ongoing monthly cost of service would have been at least ten times what it would have cost for the same service in a metropolitan area. We currently use microwave technology to provide basic internet service, which, while being a convenient solution at the moment, offers limited long term capabilities because of restricted bandwidth capacity. In addition to enhanced broadband capability, fiber connectivity would enhance the non-existent cellular service in that area which remains a critical health and safety concern for the college administration and community.

Another one of CMC's instructional sites, CMC Buena Vista, also lies outside of the city boundaries and involves another expensive fiber build-out of infrastructure. In that case, the cost of the build-out would be over \$100,000. Again, because the telecommunications provider would necessarily have to recoup the infrastructure investment through a charge-back to the college, the ongoing cost for provider services would be prohibitive for the college. It is worth noting that Buena Vista lies within Chafee County, Colorado, a USDA designated StrikeForce Zone, so designated because of the consistent rate of poverty. According to the USDA (<http://www.usda.gov/documents/usda-strikeforce-fact-sheet.pdf>), ninety percent of America's persistent poverty counties are in rural America. Recognizing this, the USDA aims to increase investment in these areas so as to ensure that this part of the country does not get left behind in economic development efforts.

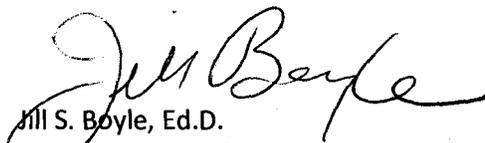
The eleven CMC sites serve as central points of internet access where residents of each local community can connect to distance learning and technical training. Typically, local citizens and students gather in the CMC cafeterias, coffee shops, and libraries at their closest campus. Our libraries, like most community colleges' libraries, are public and open to the local community. As such, they are hubs for educational research and require adequate internet capability. In some of our communities, the CMC library is the primary library.

Unfortunately, under the current rules of the E-Rate 2.0 program, community college libraries are explicitly disallowed from participating in the e-Rate program even if, as is the case for many rural community colleges, these libraries are the only public library for the area. We would request a review of the definition of a public library to include rural community college libraries which offer an invaluable service to the education opportunities for rural communities.

Updating the E-Rate program to allow rural community colleges to apply for funding support would provide considerable direct aid to institutions like Colorado Mountain College so that the institution would be able to upgrade internet infrastructure and better provide modern, high-speed, reliable internet access for the information age. Expanding broadband accessibility within our rural service area would vastly enhance educational opportunities available to both post-secondary students and K-12 students in our communities and would benefit the region as a whole. Community colleges are a key bridge to higher education and economic opportunity for hundreds of thousands of students nationwide and nowhere is their role more pivotal than it is in rural America where these colleges are often the sole provider of so many services ranging from basic education and secondary remediation to higher education.

Thank you for considering our comments on this vital issue that will shape the future of education for rural America.

Sincerely,



Jill S. Boyle, Ed.D.  
Senior Vice President  
Colorado Mountain College