

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. Before delving into my response to the proposed changes, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

USD 340 Jefferson West is a rural Kansas district of about 850 students in grades K-12. We have used E-Rate to help support our bandwidth and our telecommunications needs. Recently our district embarked on a plan to improve the use of technology by our students and teachers in an effort to improve student engagement in the learning process. As part of that process our community approved a bond issue to support that process along with multiple updates to our facilities. Due to cutbacks of more than \$600 per student by the Kansas legislature about five years ago and a lack of any real increases districts such as our had to resort to passing a bond issue to provide our students with the opportunities to learn that other districts in Kansas provide for their students. The demographics of our district have changed in the past ten year with a 50% increase in the number of students qualifying for free and reduced lunches. As part of the improvement process came the need to increase our bandwidth from 20 mgs to more than 50 mgs. Our cost for that along increased by 100%. Not knowing that our provider at that time was being sold and the new provider cost was considerably more than what we were paying the former provider. This change came about in the late spring and as a result we were not able to attach this cost to our e-rate application at an increase of tens of thousands of dollars. We are counting on being able to apply this added cost of providing internet access to our students and staff as part of the learning process to our e-rate application for next year. Our phone system in some of our buildings is more than 20 years old and phones are no longer available to replace those that no longer work. We continue to make due with the equipment and services we have but they do hinder, at times, our ability to provide the service our patrons have come to expect.

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 persistently 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 commensurate with current demand.

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 programs most significant problem: inadequate funding.

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

Any change in the E-Rate program that would limit our opportunity to provide the needed services for our students would place our students in a disadvantaged position compared with other students from more affluent districts in Kansas. E-Rate has been funded at the same level for the past several years while the demands for E-Rate support have doubled over the same period of time. It is time for the funding of the E-Rate program to reflect the necessary demands for those funds. District budgets are becoming smaller but the cost to doing business is not. If we expect to have students that are College and Career Ready then we must have the support to provide those opportunities to our students. They are the backbone of the future of our country and our economy and an investment now will pay dividends a hundred fold in the future.

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,

Pat Happer Superintendent, USD 340 Jefferson West