

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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

**COMMENTS OF SOUTH TEXAS ASSOCIATION OF SCHOOLS**

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## Executive Summary

The Region One area lies along the Texas-Mexico international border and encompasses a seven county area including the area of Cameron, Hidalgo, Jim Hogg, Starr, Webb Willacy, and Zapata Counties. The geographic location of the Region One area lends itself to serving a diverse and unique student population compared to other areas of the state. With over 419,000 students in 37 public school districts and 10 charter school systems, Region One schools serve a high percentage of economically disadvantaged students (85%), the state's highest percentage of Hispanic students (97.5%), English Language Learners (34.8%), migrant students (4.68%), and English as a Second Language students.

The Region One area is an area where you can see dilapidated houses in areas called *colonias* where running water and electricity is considered a luxury. These areas often have unpaved roads that are muddied and impassable when heavy rains or bad weather arrives. As dreadful as these conditions are, you can also witness families calling these areas "home"; their homes consisting of cardboard boxes or school buses.

Region One School districts strive continuously to develop innovative programs and to seek out opportunities that will help the district meet the needs of the students. Additionally, school districts pursue avenues that will support students and bring them to an equal level to the extent that these students have access to instructional resources and technology.

While this paper is a discussion on technology and funding issues in the K-12 environment, let us not forget that the knowledge and skills a K-12 student learns today is the basis for a college education or employment in the increasingly technological workplace. Many colleges and universities have moved to digital textbooks and the use of laptops/tablets for instruction. Many offer on-line courses for specific subjects that are Internet based and cannot be attended other than through the Internet. Our students must be prepared to enter this arena with knowledge that allows them to effectively use technology as an educational and workplace tool.

Many mobile device initiatives in the Rio Grande Valley would not be possible if not for E-Rate.

With increased devices on the network comes the need for increased bandwidth. District in the Rio Grande Valley would not be able to afford the bandwidth needed to support such devices on the network.

Although school districts in the Region One area have benefitted greatly from the E-rate program, the ever changing technology and academic requirements require upgrades to maintain and expand the current networks. This requires an ongoing economic support system to be in place such as E-rate funding.

## **Simplifying the Process**

1. Improve internal communications within USAC. On many occasions during the review process, a reviewer requests documentation that has already been submitted in response to a previous reviewer request. A specific example would be a request for documentation to verify the eligibility for an entity. A centralized database that links the entity notes to all applications would assist USAC in streamlining the review process.
2. Eliminate excessive forms. We are recommending that one form be established to cover all stages of the process including: the initial application process, reporting once funded, and invoicing. We recommend for the form to have stages of approval and that it be accessible at any given time by USAC, the vendor, and the applicant (similar to a work flow system).
3. We recommend that reimbursement of funds go directly to the applicant. The current verification process should be kept, however the check should go directly to the applicant once the verification process is complete.
4. The two-of-five rule should be eliminated. The current system does not allow for cost effective use of the funds. The two-of-five rule, in conjunction with network operations center being eligible only as a consequence of being necessary as a transport hub for Internet access, leads to all entities using one of their two-of-five years anytime the network operations center (NOC) is upgraded. This incentivizes districts to upgrade equipment at campuses that may not need to be upgraded in that year, simply because they are going to be counted as using that year anyway when a NOC upgrade occurs.
5. We support keeping the current funding mechanism in place. The E-Rate program was mandated by the 1996 Telecommunications Act to fund telecommunications and internet access in U.S. schools and libraries, in a manner that the most needy schools and libraries are preferentially funded. If any changes are made to the way funding for schools is determined, it must continue to provide funding to schools in rural and low socio-economic areas that is proportionally equal to or better than the current funding formula. The goal of this program was

never intended to provide equitable funding for all schools, but rather to provide equity among schools by providing more funding to the needier school districts.

6. We support the implementation of a funding cap.
7. We support emphasis of the use of established Regional Purchasing Consortia to leverage pricing.

## **Eligible Services Considerations**

### **The following services should be E-rate eligible:**

1. Privately owned WAN fiber should be E-rate eligible.
2. Content filters are required and therefore should be E-rate eligible.
3. To reach the goal of universal broadband access by students and educators, we recommend the E-rate funding be provided for ensuring easy access to robust broadband connectivity outside of schools including, but not limited to, the home and such publicly accessible institutions as libraries and community centers. (ie: wireless on school buses)

### **The following services should not be E-rate eligible:**

1. Basic Maintenance of Internal Connections.
2. Paging Services.
3. Directory Assistance Services.
4. Cellular Services.

## **Possible sources for Additional E-Rate funding?**

1. All vendors wanting to participate in the E-Rate program should be subject to a SPIN registration fee. This fee should be administered every time the vendor renews their SPIN. Require all vendors participating in the E-rate program to complete an annual E-rate training. This will ensure that all vendors comply with all E-rate rules and regulations. This will help eliminate waste and fraud.
2. Currently only Telecommunications providers pay into the USF fund. Should Internet service providers or internal connection providers that receive funding also contribute to the fund? Each vendor awarded an E-Rate project should incur an administration fee equal to 1% of the total award. These funds would go back to the general fund for the next funding year.

3. Raising the USF contribution factor will increase the funding base. The current proposed contribution level is 15.1 percent of the interstate telecommunications charges on a customer's bill. Some have advocated raising this to as much as 25%.
4. Proposals have been made to increase the number of sources from which universal service fund is collected. This could include expanding contributions to include intrastate telephone services (calls within single states), voice over IP (computer-to-computer calls), and information services such as broadband, and increasing contribution requirements from wireless communication providers. One question is whether the providers of internet access should contribute to the fund like other companies that provide access to telecommunications, if such providers also want to draw from the fund.
5. Basic Maintenance of Internal Connections should be ineligible. This would force manufacturers to provide better warranties. Since the funding for this category is fairly large, this would free up significant funding.

Submitted Respectfully,



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