



November 5, 2013

Marlene H. Dortch
Secretary
Federal Commissions Commission
445 12th Street SW
Washington, DC 20554

Re: Modernizing the E-Rate Program for Schools and Libraries, WC Docket 13-184 Comments

Dear Ms Dortch,

AdTec, Administrative and Technical Consulting, Inc., is an Indiana based consulting firm engaged in the business of Universal Service Fund E-Rate Consultation, and wishes to add to our comments posted during the initial filing period. Since that initial filing we have had time to do additional investigation and have found that data does exist to support our claim that funding from ERate generally represents less than 1% of the total revenue received by school entities. We believe this data could be replicated throughout every state and the US territories that the program serves.

As the FCC moves forward with considering the myriad of changes proposed in the NPRM we respectfully request the data presented in this comment be taken with serious consideration. Paragraph 226 seeks comments on FCC proposals and any other ways in which the FCC can streamline the administrative processes.

Response: Simplify, Simplify, Simplify. If the IRS can create a 1040EZ surely the FCC can streamline the E-Rate filing requirements for Priority 1 services, especially for those entities that receive less than \$50,000 in total P1 funding commitments. These are the very entities that have generally given up because the filing process is cumbersome and complicated with the administrative burden being disproportionate to the revenue received. We specifically recommend that the FCC adopt rules that allow a streamlined process for entities receiving less than \$50,000 in total P1 commitments per year. If invited by the FCC we will supply specific details on how to streamline the process.

The following chart serves as an example of randomly sampled Indiana school entities that will support the above response to paragraph 226. The data was collected from the Indiana Department of Education database of financial reports found at <http://www.doe.in.gov/finance/school-financial-reports> and the USAC Data Retrieval System.

Name of Entity	BEN	Total Revenue July 1, 2011 to June 30, 2012	ERate P1 Revenue July 1, 2011 to June 30, 2012	Percent of ERate P1 Revenue of Total Revenue
Adams Central CS	130438	\$12,025,292.49	\$22,350.42	0.19%
Benton Central CSC	130759	\$22,447,509.00	\$66,360.50	0.30%
Crawford County CSC	130546	\$19,382,300.66	\$140,132.89	0.72%
Crown Point CSC	130296	\$99,448,521.16	\$153,968.07	0.15%
Danville CSC	130229	\$26,594,646.29	\$45,914.68	0.17%
East Gibson SC	130708	\$10,000,595.99	\$24,222.00	0.24%
East Noble SC	130429	\$44,773,901.59	\$123,615.05	0.28%
Eastern Howard SC	130479	\$13,368,252.08	\$34,512.83	0.26%
Elkhart CS	130359	\$159,773,222.71	\$244,446.17	0.15%
Geist Montessori Academy	16057422	\$1,539,336.44	\$2,400.00	0.16%
Greenfield Central CS	130245	\$52,778,453.39	\$41,926.69	0.08%
Greensburg CS	130564	\$24,126,244.84	\$39,064.28	0.16%
Greenwood CSC	130246	\$35,499,688.19	\$90,015.41	0.25%
Imagine Life Science West	16055443	\$5,684,150.10	\$41,540.02	0.73%
Jay County SC	130619	\$45,847,177.12	\$108,729.82	0.24%
KIPP Indpls College Prep	16038747	\$2,976,702.60	\$37,400.94	1.26%
Layfayette SC	130738	\$98,430,495.72	\$227,847.82	0.23%
Logansport CSC	130485	\$56,300,720.79	\$155,155.23	0.28%
MSD Shakamak	130644	\$9,215,506.68	\$24,945.03	0.27%
MSD Washington Township	130285	\$124,730,083.81	\$133,450.42	0.11%
Muncie CSC	130582	\$108,312,888.39	\$276,457.34	0.26%
New Prairie United SC	130381	\$31,343,885.79	\$65,883.10	0.21%
North Montgomery CSC	130768	\$21,351,456.16	\$54,876.01	0.26%
North Putnam CSC	130219	\$16,939,827.27	\$34,587.30	0.20%
North White SC	130770	\$11,865,285.10	\$30,688.52	0.26%
Options Charter Carmel	16021597	\$1,143,514.27	\$13,942.26	1.22%
Plymouth CSC	130388	\$36,963,891.83	\$235,640.53	0.64%
Prairie Heights CSC	130434	\$15,803,472.92	\$20,156.88	0.13%
South Bend CSC	130400	\$303,164,927.07	\$884,156.93	0.29%
South Madison CSC	130206	\$46,046,402.70	\$61,442.06	0.13%
South Ripley CSC	130528	\$13,709,989.21	\$11,637.00	0.08%
South Spencer County SC	130704	\$16,803,772.13	\$60,040.43	0.36%
Turkey Run CSC	130728	\$6,349,685.02	\$35,378.99	0.56%
Union Township SC	130338	\$16,630,180.04	\$33,864.30	0.20%
Wilson Ed Ctr. Coop	130535	\$2,171,117.66	\$14,568.48	0.67%

Should you have further questions about the information contained within this letter, please do not hesitate to contact me at charlie@adtecerate.com.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Charles F. Hobbs". The signature is written in a cursive style with a large, sweeping initial "C".

Charles F. Hobbs, PhD
President