

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of

Modernizing the E-rate
Program for Schools and Libraries

WC Docket No. 13-184

REPLY COMMENTS OF SCHOOLWIRES, INC.

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SUMMARY

Phasing out E-rate support for web hosting services would jeopardize school districts' most important means for communicating important information—their public websites. In its initial comments, Schoolwires presented the results of a survey of school districts it conducted, which showed that an overwhelming percentage of respondents rely on web hosted services for communications and digital learning services that are critical to their educational mission. Along with Schoolwires, a large number of school districts and educators also filed comments asking the Commission to preserve Priority One E-rate support for web hosting. Schoolwires is filing these reply comments to demonstrate, using the words and experiences of these commenters, that the record reflects strong support for continued E-rate funding for web hosting.

The message that Schoolwires and many school districts wish to convey is this:

- Web hosting provides critical services for schools that allow them to communicate with parents, students, and community members effectively and quickly.
- Web hosting facilitates digital learning and drives broadband adoption at low cost, and diverting this funding to broadband access services would not meaningfully advance the Commission's broadband goals. Schoolwires estimates that diverting money from web hosting to broadband access services would provide funding to connect only 1.8% of the total number of eligible schools.
- Phasing out E-rate support for web hosting would cause serious hardship for many school districts that would be forced to cut already tight budgets to pay the full cost of web hosting or abandon a critical communications platform.

Schoolwires, along with the school districts it serves and the educators who have filed comments in this proceeding, asks the Commission to retain E-rate support for web hosting—the school districts' primary channel of communications and a key component of their digital learning strategies.

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Schoolwires, Inc. (“Schoolwires”), through its undersigned counsel, hereby submits these Reply Comments in response to the Notice of Proposed Rulemaking (“NPRM”) released by the Commission on July 23, 2013, in the docket captioned above.¹ The significant number of comments filed in this proceeding attests to the critical role that the Commission’s Schools and Libraries program, also commonly referred to as the E-rate program, plays in facilitating twenty-first century connectivity and learning in the nation’s schools and libraries. Schoolwires has reviewed these comments with interest and appreciates this opportunity to respond. Schoolwires applauds the Commission’s efforts to modernize the E-rate program so that it supports improved connectivity and enhanced digital learning. The comments filed in this proceeding have raised many ideas and issues worthy of discussion. Schoolwires takes this opportunity to expand its comments in support of maintaining web hosting as a Priority One service.

In its initial comments, Schoolwires presented the results of its survey of school districts, which demonstrated the critical role web hosting plays for school districts of all sizes as a

¹ *Modernizing the E-rate Program for Schools and Libraries*, Notice of Proposed Rulemaking, WC Docket No. 13-184, 28 FCC Rcd 11304 (rel. July 23, 2013) (“NPRM”). All references to comments herein are to comments filed in response to the NPRM.

powerful platform for communications and classroom engagement.² The comments filed by educators and school districts reinforce the fact that school districts overwhelmingly support continued E-rate funding for web hosting. In contrast, some other commenters, including some state governments, have suggested that support for web hosting should be de-prioritized or phased out and the money used to further increase access to broadband. While Schoolwires appreciates the importance of funding broadband, these commenters appear not to have considered the strong link between web hosting and achieving these states' broadband and digital learning goals. Web hosting facilities provide the necessary access point that leverages raw broadband services and makes those services meaningful for students, parents, and educators. Because web hosting provides these critical “on ramp” facilities at low cost (as even its critics admit), not only would eliminating funding for web hosting not advance the deployment of broadband services, it would actually be counterproductive to that goal.

A. Web Hosting Provides Broadband Access Facilities at Low Cost

Web hosting provides the broadband access facilities that school districts need to leverage raw broadband services. It provides the infrastructure necessary to provide twenty-first century communications services to students, parents, teachers, and administrators—and it does so at remarkably low cost. The NPRM asks whether web hosting is more expensive than it should be, citing as the sole source for that concern comments filed by the State E-rate Coordinators' Alliance (“SECA”) over four years ago in 2009.³ Schoolwires notes that SECA's views about the necessity and cost effectiveness of web hosting have evolved since that filing, and it now recognizes the crucial importance of web hosting.⁴ In its comments in the present

² Comments of Schoolwires, Inc.

³ NPRM at 97, fn. 138.

⁴ “SECA, however, believes that email, webhosting and telecommunications services used exclusively for

proceeding, SECA writes “First, it appears beyond dispute that in today’s environment, voice telecommunications service, email and a website presence is vitally necessary to schools and libraries.”⁵ It also writes that phasing out support for web hosting “will create a significant financial hardship for many applicants who will need to find additional resources to pay the full costs of these services. These organizations in turn will have fewer resources to pay for their non-discounted share of broadband services which will undermine the FCC’s broadband goals.”⁶

Moreover, even the critics of web hosting admit that “[e]limination of web hosting and email services would have minimum impact [on savings to the program] as these costs are minuscule compared to network infrastructure upgrade costs and monthly ISP costs.”⁷ On the other hand, many school districts, including the Mill Valley School District, recognize that web hosting, in addition to being “critical,” is a “cost-effective service for school districts.”⁸

Funds for Learning has calculated that the average individual school requests only \$252 per year, or \$21 per month, in E-rate support for web hosting and email services combined.⁹ This compares with an average of \$7,097 per year requested for all other services in the Internet access category. Another useful (albeit imperfect) comparison can be made to the broadband connections provided to rural healthcare facilities in the Rural Healthcare program (“RHC”),

voice communications should not be eliminated altogether and continue to be eligible for E-rate funding, albeit based on a different priority system.” Comments of SECA at p.22. While Schoolwires agrees that support for web hosting should not be eliminated, it disagrees that making it a Priority Two service is the right answer, because this fails to take into account the current lack of funding for Priority Two services. Unless other structural changes are made, Priority Two services are unlikely to receive any funding in the future.

⁵ *Id.*

⁶ *Id.*

⁷ Comments of Pacifica School District; *see also* Comments of the Wisconsin Department of Public Instruction (“We have no strong opposition to phasing out support for some services like paging, email, and webhosting, but we do note that doing so will save very little in E-rate funds”).

⁸ Comments of Jim Bowlby, Mill Valley School District.

⁹ Comments of Funds for Learning at 31.

who likely have higher broadband speeds than what schools currently do.¹⁰ Although the analogy is not perfect for various reasons, one Commission order reports a per site cost of \$14,895 for broadband services to RHC participants.¹¹ This is 60 times the cost of providing web hosting services. At that per site cost, the \$28 million currently spent on web hosting would fund broadband services for approximately 1.8% of all schools eligible for E-rate support.¹² These numbers confirm that if the funding now used to support web hosting were shifted to supporting the purchase of raw broadband services, it would not make a dent in advancing the Commission’s broadband goals.

B. Web Hosting Drives Broadband Adoption and Mobile Learning

Despite its low cost, web hosting has a high impact, providing critical infrastructure to school districts and operating as a driver of broadband adoption. Comments filed by the State of Arkansas help explain the breadth of services provided by web hosting, which together drive online engagement:

Web hosting services are used to make content electronically available for all parties, be it recorded lessons for students to access at home, calendar events that are filterable by activity, forms for parents, homework submission for students, shared blogs for teachers and students.¹³

Educator Ken Benich writes that web hosting “greatly impacts the overall education experience” in schools by giving them a “digital presence and access in an ever increasing digital world.

¹⁰ RHC participants typically have a significant portion of their own facilities to boost the impact of RHC funding. Moreover, it is unclear whether the \$14,895 per site cost cited in the Commission’s order includes the matching funds contributed by the healthcare facility.

¹¹ *In the Matter of Rural Health Care Support Mechanism*, Report and Order, 27 FCC Rcd 16678 (rel. Dec. 21, 2012).

¹² Based on 101,000 schools participating in the National School Lunch Program <http://febp.newamerica.net/background-analysis/federal-school-nutrition-programs>; *see also* NPRM at 97 (reporting a total cost to the E-rate program of \$28 million for web hosting in funding year 2011).

¹³ Comments of the State of Arkansas.

Taking away funding for Web Hosting will hamper the transparency that we are striving for in our district.”¹⁴ Dwight Woodley writes that web hosting is “an important piece for our teachers in the educational process...[f]rom posting [homework] assignments, providing easy access to important educational web sites, and informing the community on the curriculum being taught.”¹⁵ For many school districts, a broadband transport service alone is insufficient to drive adoption of broadband services.

Further, as more school districts are looking to expand their online presence to mobile devices, web hosting can provide a solid platform from which to build mobile services that are tied to educational purposes. As Michele Wagner of Baltimore County Public Schools explained in her comments, “The cost to schools of NOT offering web hosting as an e-Rate eligible service will continue to increase as we depend on our web hosting services to support a whole new line of mobile applications that are buil[t] upon the services and content on our web hosting environment.”¹⁶

C. Web Hosting Is School Districts’ Primary Means of Communicating with Students, Educators and Parents

The school districts and educators who submitted comments in this proceeding describe web hosting as their primary means of communicating with students, educators and parents, and advancing digital learning goals. Wisconsin Rapid Schools writes that web hosting, along with e-mail and collaboration tools, provide parents “with opportunities to see how their children are performing academically and to discuss critical education issues with their children and their

¹⁴ Comments of Ken Benich.

¹⁵ Comments of Dwight Woodley.

¹⁶ Comments of Michele Wagner (Baltimore County Public Schools).

children’s teachers.”¹⁷ Knox County Schools writes that the services provided by web hosting “have proven to be mission critical services for our district.”¹⁸ Many other educators filed comments describing the school districts’ need for E-rate supported web hosting:

- “Almost all School Districts have a (need for) website and use email for communication. These are fundamental essentials for resources and quick communication not only for internal staff and students but the parents and community members alike.”¹⁹
- Web hosting and email “are primary sources of communication with our parents, keeping them abreast of what their children are learning to foster the necessary home-school relationship for student success.”²⁰
- “Our web portal is the central communication hub for the district, parents and the community at large. In a world that depends a great deal on the web and the services provided, it is a great concern to our staff, students and families to potentially lose [sic] access to a communication portal that took years to build and teach the community to rely on for district updates, emergency notifications and access educational resources and programs. We strongly urge you to consider keeping web hosting services among the priority 1 category.”²¹
- “Websites are critical to [student] success, and instrumental in attracting and retaining families, teachers and administrators, and in improving teaching and learning outcomes through parental engagement and school-to-home communications.”²²
- “We feel that this is a must for our school district as a communications tool with parents and community.”²³
- “Web hosting [is] a critical communication piece for most K-12 public education institutions. Our web site is used heavily for communicating information to parents, students, and community members on our school district”²⁴
- “Please DO NOT REMOVE funding for school district websites via E-rate rebates. Our district of 125,000 students rel[ies] on this service and it is critical to how we share information with parents and other key stakeholder groups (emergencies, school activities, district/school/classroom information, supplemental learning content, 21st century learning, etc).”²⁵

¹⁷ Comments of Wisconsin Rapid Schools.

¹⁸ Comments of Knox County Schools.

¹⁹ Comments of Brandon Curless.

²⁰ Comments of Erin Ryan (Mother of God School).

²¹ Comments of Scott Major (Boyerton Area School District).

²² Comments of Marissa Baptista.

²³ Comments of Nil Grove.

²⁴ Comments of Dwight Woodley.

²⁵ Comments of Mark Sherwood.

- “As the 26th largest school district in the State of Missouri, we, as well as the majority of school districts, rely heavily on website communication to keep parents informed and engaged. Our website is the hub of information that we constantly point and direct parents to. O[u]r parent portal allows parents to check grades, lunch accounts and more. In a busy world with sometimes both parents working (sometimes working more than one job) face-to-face contact is less likely.”²⁶

Support from the E-rate program has allowed schools to implement web hosting as an effective and ubiquitous means of communications between schools, parents, students, and educators. Of the school districts surveyed by Schoolwires in connection with this proceeding, 95% reported that web hosting provides a cost effective mechanism for sharing information with community members.²⁷ 79% reported that web hosting allowed district leaders to communicate quickly and efficiently during times of crisis.

It is important to note the impact that phasing out support for web hosting would have on parents. Parents use web hosting services to communicate with teachers and monitor the academic progress of their children. The loss of E-rate funding would have an immediate and significant impact among parents at all participating schools.

In fact, data from Project Tomorrow’s Speak Up National Research Project²⁸ indicates that school websites are a crucial channel through which parents communicate with teachers, and that a school web portal is a major way parents want to receive information about their child’s grades

²⁶ Comments of April Bryant.

²⁷ Through more than a decade of directly serving and partnering with educators, Schoolwires has made it a point to thoroughly understand the needs of the customers it serves. It also believes that when it comes to E-rate reform, the voices of school districts, individual schools, administrators and teachers are among the most valuable. For these reasons, Schoolwires surveyed its customers regarding E-rate modernization in 2013. 208 education leaders representing their districts responded to the company’s 2013 survey.

²⁸ Project Tomorrow is a national education nonprofit organization with a 16 year history of impacting education and changing the lives of children through science, math and technology education. The Speak Up project was started in 2003 as an outcome of a national AmeriCorps program. The first Speak Up online surveys were funded by a small grant from the US Department of Education, which was interested in infusing some student views into its National Education Technology Plan. Subsequently, additional Speak Up surveys were developed to provide opportunities for teachers, librarians, technology coordinators, administrators, parents and pre-service teachers to share their voices as well. Since 2003, over 2.6 million online surveys have been submitted through the Speak Up project. These represent the largest collection of authentic, unfiltered stakeholder input on education, technology, twenty-first century skills, schools of the future and science instruction.

and assignments. Because web hosting increases parental involvement, it also increases student achievement.²⁹ The Commission should not remove support for this service at the moment when it is most needed by educators, students, and parents.

D. School Districts Overwhelmingly Support Retaining E-Rate Support for Web Hosting

The comments filed in this proceeding reinforce what Schoolwires reported in its initial comments: school districts overwhelmingly want E-rate support for web hosting to continue. Schoolwires' survey found that 98% of responding school districts believe that their websites perform critical educational functions. This opinion is not limited to a single type of school. Predominantly rural Au Gres-Sims School District writes that "the continued e-rate allocation funding for our website, web hosting and email is critical toward making a positive impact to education, the learning experience and the future of our students."³⁰ Kerry Perkins of Yupiit School District, located in a remote part of Alaska, writes that:

Web hosting service under the Schools and Library is an important service for our district. Because of our remote location in Rural Alaska, our district needs to be able to communicate to our parents, students, staff and communities. Our New Website/Web Hosting service, (www.yupiit.org) is now live and all parents, students, staff and communities are finally able to collaborate for the first time!³¹

Rural Fort Cherry School district explains that with web hosting, "[w]e have a lot of information that makes it much easier to communicate with the community, parents, and students. Without the E-Rate we get, I doubt the district could afford to keep Schoolwires and our website as it is."³²

²⁹ Andrew J. Houtenville, Karen Smith Conway, *Parental Effort, School Resources, and Student Achievement*, The Journal of Human Resources, Volume XLIII at 438 ("parental effort is consistently associated with higher levels of achievement. The magnitude of the effect of parental effort is also substantial—along the order of an additional four to six years of parental education or more than \$1,000 in per-pupil spending.").

³⁰ Comments of Au Gres-Sims School District.

³¹ Comments of Kerry Perkins (Yupiit School District).

³² Comments of Matthew Nelson (Fort Cherry School District).

Urban school districts also benefit from web hosting. Writing for Baltimore County Public Schools, Michele Wagner asks the Commission to:

Please allow web hosting to remain an e-Rate eligible service so that school districts can continue to enjoy the benefit of this highly effective and continually expanding communication tool. Effective communication with our parents and community directly impacts the success of our students and teachers in the classroom.³³

Ray Eernisse of the suburban Francis Howell school district writes that:

Our communications and public relations staff rely on the use of our district website to inform and engage our community in the business of the District. The proposed changes to eligible services that would eliminate funding for web-hosting would be detrimental to the district in terms of budget dollars for communication.³⁴

Web hosting services allow school districts in rural, urban, and suburban areas to communicate with their communities and provide educational services to their students. Far more than simply providing a static web page, web hosting provides a scalable communications platform that can be used successfully by schools of any size.

E. Phasing Out Support for Web Hosting Would Mean Increased Costs to Schools that Could Exceed the Cost of Paid Web Hosting

Many of the school districts that filed comments were concerned that a phase-out of E-rate support for web hosting could lead to dramatically higher costs for their budgets. As Gary Oke of Center Line Public Schools explains,

Our website, web hosting, and e-mail systems make a positive impact on supporting education. These tools are especially important in cash-poor urban districts such as ours. It has been said that websites, web hosting, and e-mail are going to be dropped from E-rate support because there are free products in the marketplace that can run web and e-mail services. While it is true that free

³³ Comments of Michele Wagner (Baltimore County Public Schools).

³⁴ Comments of Ray Eernisse (Francis Howell School District).

options exist, "free" is not really free. Running web and e-mail onsite requires servers, server operating system software, in-house support to maintain and backup hardware, and more. In general, it is much LESS expensive to run paid web and e-mail options in "the cloud" than [sic] it is to run "open source" products in-house.³⁵

Similarly, Michele Wagner of Baltimore County Schools notes that:

Migrating the services we currently offer may reduce the amount we are charged to host our services, but [the] costs to recreate the services offered by K-12 targeted services would be extremely high.³⁶

Commenter David Canaday writes that "[l]osing this credit would just be one more expenditure we would need to absorb as a result of E-Rate and state cutbacks. We need this service to continue as E-Rate eligible services."³⁷ Dave Del Boccio writes that "[e]limination of E-rate funding for Web hosting would result in the need to make cuts in staffing and/or other programs in order to increase IT budget to offset the loss of the funding and hosting."³⁸ Matt Penner explains the costs in staffing and support that would attend a phase-out of support for web hosting, and refutes the claim that free services are an acceptable substitute:

There are a very small number of free tools that might have the capability of providing the same content of the paid versions, however, this would only be after several hundred hours of creating content, developing modifications and providing in house support, all which would vastly exceed the cost of the paid service. Free is simply not free. The costs are just shifted elsewhere where staffing and funding sources are often limited at best.³⁹

When Schoolwires surveyed its school district customers, 84% reported that the elimination of E-rate funding for web hosting would result in cuts in staffing or other programs. These comments clearly demonstrate that the web hosting services supported

³⁵ Comments of Gary Oke (Center Line Public Schools),

³⁶ Comments of Michele Wagner (Baltimore County Public Schools).

³⁷ Comments of David Canaday.

³⁸ Comments of Dave Del Boccio.

³⁹ Comments of Matt Penner.

by E-rate offer solutions that are very cost effective for both schools and the E-rate program.

F. Phasing Out Support Could Mean Abandoning Communication and Education Tools and Undermining Digital Learning Goals

At worst, phasing out E-rate support for web hosting could drive school districts to abandon the communication and learning infrastructure that they use every day. As educator Kristy Machamer writes,

Eliminating this funding may cause hardships on small rural districts like mine, which will sever our relationship with our website host and then the lines of communication that we have begun to bridge with our parents and community will then crumble.⁴⁰

Similarly, Kerry Mooney writes “[w]ithout the E-rate funding for web hosting we would not be able to offer as much information in a timely manner to our staff, students, parents, and public. We do not have the budget to pay for it alone and really appreciate the E-rate funding for this.”⁴¹ Commenter Nicholas Ward finds his school district in a similar situation: “Removing web hosting services from e-rate would basically eliminate the web presence we currently have.”⁴² Stephen Johnson writes,

The ability to leverage E-rate funds to help cover part of the cost for a managed Web-page and Email services is a huge help to a small district like ours. We do not have the man power or the financial resources to pay the salaries for someone to build Web pages or purchase the necessary equipment to host our own e-mail services.⁴³

Phasing out or de-prioritizing web hosting services will lead to dramatic and immediate hardship for school districts across the country, and will curtail their ability to communicate with parents and engage students in broadband-enabled learning services.

⁴⁰ Comments of Kristy Machamer.

⁴¹ Comments of Kerry Mooney.

⁴² Comments of Nicholas Ward.

⁴³ Comments of Stephen Johnson.

G. Free Services Do Not Provide the Security or Communications Services that School Districts Need

As many of the comments quoted above indicate, free web hosting services are not an adequate substitute for the paid web hosting that E-rate supports. For one thing, free web hosting services do not provide the security that school districts require for web sites that host large amounts of highly sensitive personal data relating to their students. As Mark Massingill of Union Hill Independent School District writes, “[u]sing Free services, we will have security and privacy concerns, as well as not have a product that was designed especially for our environment.”⁴⁴ E-rate consultant Chris Quintanilla writes that “[r]emoving web-hosting and email services in favor of free cloud offerings is a critical error. Such offerings due [sic] not ensure privacy or confidentiality.”⁴⁵

While “free” services are advertised as no-cost alternatives to paid web hosting, in fact large amounts of school resources are required to replicate the services provided. Kim Stephens writes that “[w]e have looked at the free sites that are available and none will serve our needs. It takes many more hours of labor in our district to maintain a free site.”⁴⁶ Similarly Kendt Eklund notes that “[h]aving a well-developed and supported system for collecting and sharing school information is critical to school and community communications. Free services cannot address this need, and to use existing free sites and tools requires technical expertise and time that school districts simply do not have.”⁴⁷

⁴⁴ Comments of Union Hill ISD.

⁴⁵ Comments of Chris Quintanilla.

⁴⁶ Comments of Kim Stephens.

⁴⁷ Comments of Kendt Eklund.

Finally, free services simply do not provide the types of services that many school districts need. As Jim Bowlby of Mill Valley School District writes of paid web hosting “a paid service provides valuable tools that free services either don't have or will only provide with advertising.”⁴⁸ In its comments, the Software & Information Industry Association writes that: [S]chools and libraries should be provided the flexibility to purchase the most cost-effective services that best meet their needs.⁴⁹ Put simply, the free services contemplated in the NPRM are not, for the vast majority of schools, acceptable substitutes for modern, secure, and reliable paid web hosting.

H. Eligible Services Should Not Be Reduced to a One-Size-Fits-All List

Schoolwires agrees with commenters who argue that the Eligible Services List should not be reduced to a one-size-fits-all set of services, but instead should preserve flexibility for school districts who face different needs. As the United States Telecom Association writes in its comments,

Individual schools and libraries have unique needs, requirements and uses for E-Rate Program funded services. For example, certain schools may be more heavily dependent on distance learning capabilities, or the streaming of educational videos, while others may have more basic needs, such as e-mail or access to web-based online content.⁵⁰

The National Cable & Telecommunications Association cautions against emphasizing connectivity above school districts' other needs, writing “[f]orcing schools and libraries to spend money on a one-size-fits-all connectivity target could lead to insufficient spending on other important elements that are not covered by the program, such as teacher training and devices for

⁴⁸ Comments of Jim Bowlby (Mill Valley School District).

⁴⁹ Comments of the Software & Information Industry Association.

⁵⁰ Comments of the United States Telecom Association.

students.”⁵¹ One-size-fits-all solutions must, by necessity, draw bright lines to distinguish what is permissible and what is not. The myriad of comments summarized above demonstrate that any such solution that eliminates funding for web hosting would deprive many school districts of the key piece of infrastructure they need to make broadband transport services truly accessible to students, educators and their communities.

CONCLUSION

The record in this proceeding shows that web hosting services are essential to school districts, educators, parents, and students. Web hosting provides school districts’ most critical means of communication and one of the most effective platforms for digital learning and broadband adoption. Schoolwires joins with these school districts and educators and asks the Commission to preserve Priority One E-rate support for these vital services.

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⁵¹ Comments on the National Cable & Telecommunications Association.