FOX CHAPEL AREA SCHOOL DISTRICT

COMMENTS RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING

WC Docket No. 13-184

NOVEMBER 6, 2013

FOX CHAPEL AREA SCHOOL DISTRICT

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Before the
Federal Communications Commission
Washington, D.C. 20554

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

COMMENTS BY FOX CHAPEL AREA SCHOOL DISTRICT
RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING

November 6, 2013

Introduction:

To whom it may concern,

We are a public school district that provides education to a diverse population of students. In speaking with our educational peers and fellow school districts distributed throughout Pennsylvania it became apparent to us that there is a dire need to identify our challenges and provide our input, considerations and evaluations regarding the next generation of the E-rate Program. Our concerns are that critical decisions which will drastically impact resource access and corresponding educational opportunities of our children will be dictated by the large school districts, intermediate organizations and other entities based on their custom needs and vested interests. Unfortunately, this would create a huge technical and resource disparity between students of the large school districts and the children of smaller and medium-sized schools (traditional, alternative education and private).

The E-rate Program has become embedded in our district's strategic planning as an important critical tool and funding resource to provide the for the required education model and corresponding technical/resource infrastructure. Although there are a substantial number of items and challenges which impact us we felt it more important for us to identify several of the key issues and/or proposed changes within the E-rate Program which would be the most beneficial or inflict a negative impact on our students. The Program's goal should be to provide for the needs of all schools equally so all children have the same opportunities. That is why it was so important for us to provide insight to the challenges and needs from smaller and middle-sized schools' perspectives such as ours. It is hoped that by identifying and voicing our concerns there will be a conscious effort by the FCC to consider the needs of the smaller and middle-sized schools and provide equitable solutions.

FOX CHAPEL AREA SCHOOL DISTRICT November 6, 2013

Summary:

Please see our comments in regards to potential changes to the E-RATE program. As all schools will attest, this program is vital cog in contributing to the education of our children. The evolving technical eco-system demands that schools are in-step and can provide the necessary basic business and educational functions on a daily basis. Continuing these essential functions through E-RATE resources is mission-critical in these budgetary challenging times for all schools. The most impactful possible changes to the program are addressed individually below:

1. Change the funding distribution model:

a.) Revise discount matrix to adjust discounts downward at all levels

Down-grading the matrix will trigger a domino effect that negatively impact the budget of the district whereas other essential educational materials and/or resources would need to be re-prioritized and evaluated. Every dollar reduced would sacrifice the district's ability to deliver quality education services which today demand a broader scope of stakeholder requirements.

b.) Move to a per-pupil formula

This scenario is extremely one-sided and bias towards large school districts. Realistically, to implement such a per-student calculation would effectively eliminate any appreciable Priority 2 opportunities for all medium and small schools and negatively impact the budget as it relates to Priority 1 services. Supporters of this solution have vested interests in acquiring as much of the available Priority 2 funds as possible for large school districts. There is not one small or medium-sized school that does not realize that this per-student funding matrix would effectively eliminate them from vying for available Priority 2 funds of any significant consequence. It should be noted that just because a school has less children the cost of technology for that school does not get cheaper.

c.) Move to an upfront grant formula

Any solution whereas the entity is required to pay for all services up-front will cause dramatic levels of budgetary challenges and should not be considered. The current program requirements at least permit the schools to make sensible choices in how/when to implement critical services and materials to align with needs and timelines.

d.) District-wide discount calculations

This would negatively impact the schools ability to leverage program resources in a manner in which schools at higher poverty rates would be likely prevented for applying for critical funds to support technology infrastructure. Schools depend upon external funding mechanisms to help them deliver needed resources at affordable fair-share allocations.

2. Change priorities so that high-capacity broadband and the associated equipment needed to disseminate that broadband to and within those buildings becomes the top priority

a.) All schools should be eligible for networking equipment, not just the 90% schools

This would be a top priority change for our schools. This new prioritization will enable the district to provide vital on-premise networking equipment to match the demanding need for higher bandwidth capacity. Additionally, this level of funding to permit the district to reach adopted common-core goals inclusive of cloud-based initiatives and educational assessments. Currently we are typically challenged in deciding to replace and upgrade infrastructure or provide instructors, purchase educational materials and/or acquiring end-user devices which are not E-RATE program eligible.

3. Consider whether some services should be eliminated

The school strongly advocates that services such as hosted-VoIP, cellular, webhosting and other voice services such as POTS should continue to be funded as they are integral services pertinent to the education of our children and represent a fair portion of technology budgets. Without the funding for these the district would be challenged to re-prioritize technology and educational spending options.

Identifying positions/challenges re: current E-rate and potential E-rate 2.0 Revisions:

Please see the following numbered items which identify current program challenges, concerns regarding funding limitations and potential matrixes being evaluated, and statements of consideration regarding next-generation E-rate. Each bullet item listed is tagged with a category ("Statement", "Existing Issue" or "Next-Generation E-rate") to help provide structure and assist the reviewer in understanding the responses as a whole. Again, please note that the goal is to detail the most important items and not define every issue. Also please note that the school would welcome any opportunity to provide additional insight/opinion regarding a particular item(s) if needed. Our submission of items for review is as follows:

1.) **Statement:** Priority 2 funding opportunities are extremely important for our schools. All schools are being mandated to participate and provide testing, data and reporting at the state and federal levels. To do so requires adequate network infrastructure (cabling and equipment w/corresponding installation) and internet access. Without Priority 2 funding there would be no opportunity for the schools to establish this infrastructure. Such infrastructure is needed at the opening of a school and cannot be implemented over a period of time. It is essential that funding for Priority 2 remains…by either increasing the allocation of funds available for the program and/or reducing/eliminating some currently eligible services such as Basic Maintenance.

2.) **Statement:** Priority 2 funding opportunities can potentially have more funding made available for it by making schools accountable for providing proof of actual cellular minutes leveraged from a previous year's total invoicing and only funding that initiative/service within a certain percentage of actual services used verses a collection of high-usage service plans that are only leveraged at a fraction of their potential capacity. Doing so could potentially reduce a majority of schools'/districts' funding request for said services by a significant amount and accumulatively recoup substantial funding back into the program.

3.) **Existing Issue:** We understand the ideal ology regarding the "start of services" date requirement of July 1st or later of a current e-rate year. The problem is that this restriction is not practical for cabling services. The challenge is that there are typically a limited number of qualified SPIN registered cabling service resources available in a region. Those vendors must try to address multiple cabling jobs for multiple schools within a very short amount of time (July 1st to typically the second week of August) after which the network equipment must then be installed and tested. If just cabling services were permitted to begin before July 1st (but not allowed to be invoiced until July 1st or later) it would substantially reduce issues for *all* schools. Such a change would have no impact on E-rate financially.

4.) **Next-Generation E-rate:** One of the proposed Priority 2 funding proposals up for consideration consists of calculating a flat not-to-exceed funding dollar amount based on an assigned dollar allocation per student. It should be noted that just because a school has less children the cost of technology for that school does not get cheaper. A required router between the Internet and the school's internal network still costs a specific dollar amount. That amount however would end up being a substantially higher percentage of the available Priority 2 funding for a small school verses as that of large school. This creates more disparity of opportunity between children and staff of smaller schools compared to larger schools. Any other solution would be more agreeable…even to the point of reducing funding percentages to actually match the student poverty level (i.e.: if a school's poverty level is 75% they would get funded at 75% and not 90%....if it is 80% then 80% funding, etc.)

5.) **Next-Generation E-rate:** One of the items identified for consideration is the simplification of the overall E-rate processes to "eliminate the need for consultants". E-rate consultant fees are not E-rate eligible and the existence of these resources has no impact on funding availability. The elimination of consultants will not infuse additional monies into the program. These resources are valuable to schools of all sizes as they play an important role in assisting the schools in identifying and acquiring the needed services. Many schools already are staff resource starved and have no capacity to absorb additional responsibilities. Parties supporting the elimination of E-rate consultants have no idea the level of challenge schools have in just executing everyday responsibilities let alone the would be stress in dealing with the multitude of actions, verifications, coordination and documentation not to mention the schedules and time deadlines of their E-rate endeavors. The amount of lost funding, over funding and subsequent misguided purchases would create a dire situation whereas the integrity of the program as a whole would suffer. Managing and registering the consultants makes more sense. Expand upon that process.

Final comment:

Thank you for reviewing, evaluating and considering our posted items listed above. We appreciate the opportunity to confirm the importance of E-rate to our school, voice our concerns and identify issues regarding the E-rate program as a whole and its next evolution.

Sincerely;

Doug McCausland

Administrative Assistant for Business Affairs