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

WC Docket No. 13-184

**NOVEMBER 8, 2013**

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# Multi-Cultural Academy Charter School

*An Award-Winning Charter High School*
3821 N. Broad Street, Philadelphia, Pa 19140
Website: www.macs.k12.pa.us
Telephone: (215)-227-0513 Fax: (215) 227-0415 E-mail: office@macs.k12.pa.us


**Federal Communications Commission**
**Washington, D.C. 20554**

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| In the Matter of | ) | |
| Modernizing the E-rate | ) | WC Docket No. 13-184 |
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**November 8, 2013**

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A major concern that my peers and I share is that the critical decisions related to this program will be made based on the custom needs and vested interest of larger, traditional school districts, and intermediate education organizations without hearing the concerns of the small to mid-sized schools such as ourselves. Therefore, we wanted to ensure that our points are not only shared through this response, but considered, otherwise there could be consequences to providing the educational opportunities to our students moving forward.

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Options:

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Down-grading the matrix will trigger a domino effect that negatively impacts the budget of the school therefore other essential educational materials and/or resources would need to be re-prioritized and evaluated. Every dollar reduced would sacrifice the school's ability to deliver quality education services placing larger demand on a broader scope of stakeholders.

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 small to mid-sized 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 to mid-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. For example, a required router between the Internet and the school's internal network still costs a specific dollar amount. Using this rational, the cost would be substantially higher based on percentage of the available Priority 2 funding for a small school versus that of a large school. This widens the disparity for students being served at smaller schools compared to those at larger schools.

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Priority 2 funding opportunities are extremely important for our school. All schools are 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.

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Please see the following items which identify current program challenges and concerns as they relate to our funding. Please note that the goal is to detail the most challenging issues for us and not to define every challenge. I welcome the opportunity to provide additional insight/relating to a particular item(s), if needed.

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James Higgins
CEO/Principal

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Office Manager/Parent