

**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)	

REPLY COMMENTS BY INTRAFINITY INC. RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING

INTRODUCTION

Intrafinity Inc. thanks the FCC for its continued support of and dedication to the E-rate program, the extent of which is reflected in the time, care and consideration involved in drafting the above noted NPRM and in allowing for a period of open comment such that any person or organization has the opportunity to be a part of the laudable goal of modernizing the E-rate program in accordance with the ConnectED initiative.

As to the above, Intrafinity believes that the hundreds upon hundreds of comments submitted by applicants to and beneficiaries of the E-rate program should be of primary importance in crafting “E-rate 2.0”, and highlights the fact that those comments are universally and overwhelmingly in agreement as to the educational value of web hosting and email services and in favour of continuing and increased funding for same.

In addition to the reply comments found below, Intrafinity Inc. strongly supports and wholeheartedly adopts the initial and reply comments submitted by our sister service providers, particularly those of *Schoolwires, Inc.*, but also those of *eChalk, Gaggle.Net, Inc.* and *eBackpack, Inc.*

REPLY COMMENTS

From a review of the many comments, both initial and in reply, that have been submitted re: this NPRM, whether from applicants or service providers, whether from governmental bodies or professional organizations, whether from lobby groups or non-profit organizations, the following conclusions emerge:

By virtue of the overwhelmingly complete and total support reflected in applicant comments as to the critical importance of continued and increased funding for web hosting and email services, the FCC’s decision to include these services in the E-rate program in the first place should be seen as an unmitigated success.

Further, web hosting and email services are of such educational value that they have become a critical component of successful education in the 21st century, a role that can only increase exponentially in the future. Unfortunately, the

financial reality for districts and schools is that E-rate funding is necessary if they are going to be able to harness the power and reap the benefits of these services.

The ConnectED initiative heralds the ascendancy of high speed broadband and connectivity as the primary purpose of any modernized E-rate program, and it is clear that continued funding for web hosting and email services is entirely consistent with this purpose and of particular benefit to same. Of equal and opposite impact, the elimination of such funding will have a demonstrably detrimental impact, in both the short and long term.

For reasons of functionality, quality, actual cost, and suitability to the K-12 market, including requirements re: statutory compliance, the “basically free” services envisioned by the FCC are not viable alternatives to the currently funded cost-based services that have been tailored to address the needs and concerns of educators and students.

Given that the “basically free” services envisioned by the FCC are neither cost effective nor viable in the K-12 context, the reduction or elimination of funding for web hosting and email on this basis would be a mistake, one that is tantamount to denying students and teachers access to these educationally valuable tools.

For the most part, comments in favour of eliminating funding for web hosting and email have done so on purely financial grounds, and not on the grounds that these services are not valuable or do not have an educational purpose in line with the stated goals of the E-rate program.

In addressing these arguments, it is crucially important to bear in mind that the amount of money that could be saved by the elimination of such funding is almost negligible (i.e. 2%) when assessed in light of the total annual cost of the E-rate program as a whole, and is extremely disproportionate in terms of the extremely negative impact of the loss of such funding on districts, schools and students.

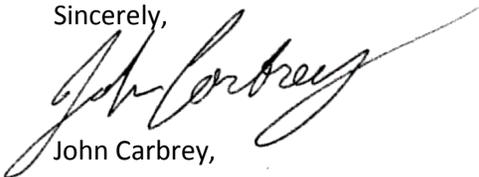
CONCLUSION

A review of the entire record of the above noted proceeding makes clear that educators working at every level and in any capacity in the K-12 milieu regard web hosting and email services as essential, and that a loss of E-rate funding for those services will almost certainly create an insurmountable financial burden for districts that are already under severe financial strain, and particularly for those whose students are already the most disadvantaged and in need of assistance.

Intrafinity agrees and joins in their request that the FCC preserve priority one status and funding for these vitally important services.

We thank the FCC for allowing us the opportunity to participate in this process, and for considering our comments as to the development of E-RATE 2.0.

Sincerely,



John Carbrey,

Chief Technology Officer