



Michael D. Saperstein, Jr.
Vice President, Federal Regulatory Affairs
2300 N St. NW, Suite 710
Washington, DC 20037
(202) 223-6807
michael.saperstein@ftr.com

November 20, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: *Modernizing the E-rate Program for Schools and Libraries*; WC Dkt No. 13-184

Dear Ms. Dortch:

On November 18, 2013, Kathleen Q. Abernathy, Executive Vice President, External Affairs; and the undersigned of Frontier Communications met with Michael Steffen, FCC Director of Digital Learning; and Lisa Hone, Michael Jacobs, James Bachtell, Charles Eberle and Dania Ayoubi of the Wireline Competition Bureau to discuss the above-captioned docket.

Frontier discussed its support of the Commission's goals for modernizing its E-rate program, which are in line with its own transformation to a provider of broadband services. Frontier used the attached document, the source of which is the West Virginia K-12 Education Report to the Broadband Deployment Council, to discuss its experiences with school broadband usage in West Virginia.¹ Specifically, Frontier's experience shows that schools are continually upgrading to higher speed subscriptions. But Frontier also highlighted that even in a scenario where all schools in the state have access to a fiber connection, 40% of schools are subscribing to speeds less than 100Mbps. Frontier noted that funding of the monthly recurring costs associated with very high-speed broadband services remains a barrier to full adoption, as the report also concludes.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Sincerely,

A handwritten signature in blue ink that reads "Michael Saperstein, Jr." in a cursive script.

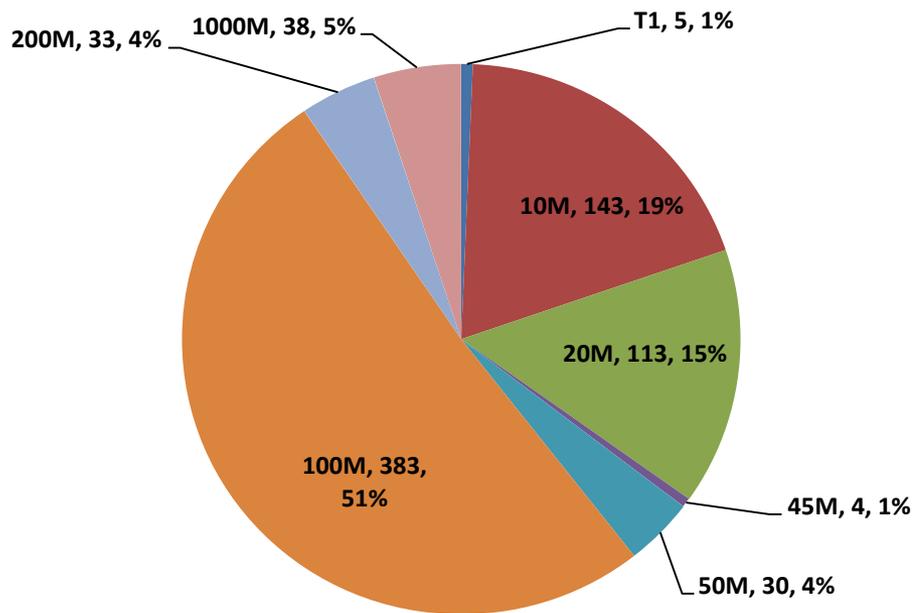
Michael D. Saperstein, Jr.

¹ WEST VIRGINIA STATE SUPERINTENDENT, WEST VIRGINIA K-12 EDUCATION REPORT FOR REPORTING REQUIREMENTS IN WEST VIRGINIA CODE §31-15C-11E (2013), data available at: <http://wvde.state.wv.us/technology/btop.php#>.

West Virginia School Broadband Subscription

735 Fiber-Connected Schools

School Connection Speeds



Representative Pricing

Speed	Price/month
10Mbps	\$575
20Mbps	\$650
100Mbps	\$1500
1Gbps	\$2500

“West Virginia is one of only a few states where all schools have access to high speed fiber-based broadband services. However, many schools are struggling to find funds to pay the monthly recurring costs of those broadband services.”

—West Virginia K-12 Education Report to Broadband Deployment Council