

September 16, 2013

The Honorable Mignon Clyburn, Acting Chairwoman  
The Honorable Jessica Rosenworcel  
The Honorable Ajit Pai  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: WC Docket No. 13–184

Dear Chairwoman Clyburn, Commissioner Rosenworcel, and Commissioner Pai:

The undersigned organizations, which represent school superintendents, teachers, principals, school boards, libraries, assessment consortia, rural schools, civil rights organizations, education technology organizations, and others, appreciate the opportunity to provide comments in response to the Notice of Proposed Rule Making in the matter of modernizing the E-rate program for schools and libraries (WC Docket No. 13–184). In response, we urge the Federal Communications Commission (FCC) to modernize, simplify, and expand the E-rate program to achieve the goal of providing 99 percent of America’s students with high-speed internet access in their schools and libraries within the next five years.

The E-rate program has been remarkably effective in bringing the internet to schools and libraries across the country. When E-rate was created in 1996, only 14 percent of classrooms had internet access; by 2005, that figure was 94 percent. Libraries have also experienced a dramatic change in connectivity. In 1996, 28 percent of libraries provided public internet access; today, virtually all libraries offer this service, and 91 percent offer Wi-Fi access.

According to the U.S. Government Accountability Office (GAO), 83 percent of public schools and 51 percent of library systems participate in the E-rate program. However, steadily emerging research demonstrates that the E-rate program must be expanded in order for schools and libraries to effectively utilize technology to enhance teaching and learning. According to FCC data, half of E-rate applicants have slower connection speeds than that of the average American home, and only 10 percent of schools and libraries funded by E-rate have the broadband capacity that is necessary for high-quality digital learning.

In order to upgrade today’s classrooms and library facilities for the twenty-first century, the FCC must build on E-rate’s record of success. Specifically, we urge the FCC to do the following:

- 1. Modernize the E-rate program.** Since the program’s inception, the success of E-rate has been measured by the number of schools and libraries receiving support. It is time to change that goal from *participation* to *capacity*. Being connected to the internet is not enough for today’s digital learning; capacity is the key. We suggest that new capacity goals be established to meet the needs of schools, districts, libraries, and library systems that ensure all students have access to the high-speed broadband needed to support quality digital learning.

2. **Streamline and increase the efficiency of the E-rate process.** The E-rate application process has improved, particularly in terms of its online filing system, but it remains a burdensome undertaking. As a result, many of the school districts and libraries that E-rate is intended to serve (i.e., those serving students and communities in low-income and rural areas) must hire consultants in order to apply, or they choose not to apply at all. We urge the FCC to consider taking steps to lessen the burden of the application process on applicants, including allowing multi-year applications for non-reoccurring services; developing applicant online portals that will permit application tracking and make it easier for applicants to apply; and encouraging consortia applications.
  
3. **Expand funding for the E-rate program.** Demand for E-rate discounts outpaces supply by more than two-to-one. For funding year 2013, \$4.99 billion was requested in support; however, E-rate funding is capped at \$2.38 billion. This funding gap does not represent the total costs associated with developing a fully functional technological infrastructure that can provide 99 percent of students with high-speed internet access in their schools and libraries. Therefore, we urge the FCC to increase funding for E-rate in order to achieve this critical goal without diverting funds from other universal service programs.

The goal of providing 99 percent of U.S. students with high-speed internet access in their schools and libraries within the next five years is both ambitious and achievable. Rarely does a federal agency have the opportunity, capacity, and support to enact policy that will have such a lasting impact. E-rate has already proven to be effective; it must now be modernized, simplified, and expanded to provide today's students with twenty-first-century educational opportunities. We look forward to working with you to bring America's classrooms and libraries into the digital age.

Sincerely,

AASA: The School Superintendents Association

ACT, Inc.

Afterschool Alliance

Alliance for Excellent Education

American Association of Colleges for Teacher Education

American Library Association

American School Counselor Association

Association of Educational Service Agencies

Center for American Progress

Coalition for Community Schools

Consortium for School Networking (CoSN)

Flipped Learning Network

International Association for K-12 Online Learning (iNACOL)

International Society for Technology in Education

League of United Latin American Citizens  
Learning First Alliance  
Los Angeles Unified School District  
Magnet Schools of America  
NAACP  
National Alliance of Black School Educators (NABSE)  
National Association of Elementary School Principals  
National Association of Federally Impacted Schools  
National Association of Secondary School Principals  
National Association of State Directors of Special Education  
National Board for Professional Teaching Standards  
National Commission on Teaching & America's Future  
National Council for Agricultural Education  
National Urban League  
National Education Association  
National FFA Organization  
National Hispanic Media Coalition  
National Indian Education Association  
National Rural Education Advocacy Coalition  
National Rural Education Association  
National School Boards Association  
National School Public Relations Association  
Organizations Concerned About Rural Education  
Parents for Public Schools, National  
Partnership for 21st Century Skills  
Partnership for Assessment of Readiness for College and Careers (PARCC)  
Project Tomorrow  
Rural School and Community Trust  
Smarter Balanced Assessment Consortium  
The American Counseling Association  
The Learning Accelerator  
Young Adult Library Services Association