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February 20, 2014

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: Modernizing the E-Rate Program for Schools and Libraries,  
WC Docket No. 13-184**

Dear Ms. Dortch:

On February 18, 2014, Kathy Zachem, Senior Vice President, Regulatory and State Legislative Affairs and the undersigned of Comcast Corporation ("Comcast"), along with Chris Putala of Putala Strategies, met with Jon Wilkins, Acting Managing Director; Trent Harkrader, Patrick Halley, Lisa Hone, and Mark Walker of the Wireline Competition Bureau; and Michael Steffen of the Office of Strategic Planning and Policy Analysis to discuss the above-captioned proceeding.

During the meeting, we expressed support for modernizing the E-rate program to foster high-speed connections to our nation's classrooms. We discussed the high-speed broadband services that Comcast currently provides to schools and libraries, and noted that the fiber connections that Comcast deploys to serve most of its school and library customers are scalable to 10 Gbps. Accordingly, if schools are provided greater opportunities to upgrade their internal networks, Comcast readily can increase the transmission capacity of its connections to schools to meet the demand for greater bandwidth.

Consistent with Comcast's comments in this proceeding, we expressed that the Commission's reforms should recognize that digital learning not only requires a broadband connection to each school, but also the infrastructure within the school that can deliver the bandwidth and technology that meet each classroom's needs. We further discussed that the majority of connections to that infrastructure likely will be through Wi-Fi enabled devices and that, as a result, Wi-Fi will be an important component of delivering broadband access to classrooms.

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We also noted that the Commission's reforms to the E-rate program should be carried out in an efficient, cost-effective manner. For example, in order to maximize the funding available for high-capacity broadband connectivity, the Commission should begin to transition E-rate funding away from legacy, narrowband services. The Commission also should revamp the current priority system. Additionally, as part of its effort to improve the effectiveness of the E-rate program, the FCC should explore ways to enhance schools and libraries' ability to make the most efficient use of the funds they receive. Specifically, we emphasized that many schools and libraries would benefit from access to templates that could assist them, as well as the ability to seek information from providers in a manner that is consistent with the competitive bidding process.

Finally, we expressed our firm belief that broadband Internet connectivity at school must be complemented by broadband access at home if Americans are to gain the full educational benefits of the Internet. We discussed Comcast's efforts to promote broadband connectivity at home through the Internet Essentials program – the nation's largest and most comprehensive broadband adoption program. To date, the program has connected over a million low-income Americans to broadband in their homes, most for the very first time.

Kindly direct any questions regarding this matter to my attention.

Sincerely,

/s/ Jordan Goldstein

Jordan Goldstein

Executive Director, Regulatory Affairs

cc: Jon Wilkins  
Trent Harkrader  
Patrick Halley  
Lisa Hone  
Mark Walker  
Michael Steffen