

March 5, 2014

**VIA ELECTRONIC FILING**

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

**Re: Ex Parte Communication (WC Docket No. 13-184)**  
***Modernizing the E-rate Program for Schools and Libraries***

Dear Ms. Dortch:

On February 23, 2014, I sent an e-mail to Patrick Halley, Associate Chief of the Wireline Competition Bureau. In it, I expressed the following views:

- **The E-rate funding cap should be increased.** Funds For Learning (FFL) estimates the current need for E-rate funding at approximately \$7 billion per year; at a minimum, FFL proposes a doubling of the fund to \$4.5 billion per year.
- **The current priority system does not adequately serve rural and small schools.** E-rate discounts are prioritized based on regulatory classifications, rather than applicants' needs. There is currently no protection for small schools and/or rural applicants.
- **FFL proposes a priority system based on applicant need.** Rather than providing discounts based on regulatory classifications, FFL recommends that the FCC prioritize discounts based on applicant needs, particularly small schools and rural applicants (i.e. school and library).
- **Remote rural applicants should qualify for double the discounts.** FFL analysis indicates that per student spending in remote rural areas is twice that of the average applicant. FFL proposes that remote rural schools and libraries qualify for discounts up to twice that of their urban counterparts.

- **Other proposals do not provide protection for small and rural applicants.** Those who are concerned that the FFL proposal will hurt small and rural applicants have not, themselves, provided any recommendations for guarding these applicants. FFL's is the only proposal to proactively, and *specifically*, guard the interests of small school and rural applicants.
- **Spending money on Internet bandwidth without adequate on premise Wi-Fi is wasteful.** A high percentage of schools today lack the necessary infrastructure to adequately use faster broadband Internet connections. Encouraging schools to request discounts on faster Internet connections without providing them adequate funding for internal connections only exacerbates this situation.
- **The FCC's current priority system limits technology choices and solutions.** To maximize the use of E-rate funds, schools and libraries should be given the choice - and incentive - to choose the most cost effective means of connecting their students to the Internet.

In my email correspondence, I also provided Mr. Halley with a slide presentation outlining the Funds For Learning proposal, a copy of which was previously submitted in an Ex Parte filing on WC Docket 13-184.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically.

Sincerely yours,

*/s/ John D. Harrington*

John D. Harrington  
Chief Executive Officer