

April 4, 2014

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

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

Dear Secretary Dortch,

Unite Private Networks, LLC (“UPN”) submits this filing to respond to the Commission’s Public Notice requesting comment on issues raised in the E-rate Modernization NPRM¹ and the goals for the E-rate program.² UPN attaches to this letter its responses to certain questions raised in the Public Notice and identifies each response by the corresponding numbered paragraph in the Public Notice including Paragraphs 10, 24, 26-30, 33-39, 54, 56 and 60.

UPN applauds the Commission’s continued efforts to modernize and reform the E- rate program to ensure all participants meet the goals of 1 Gbps broadband per 1000 students. UPN has included comments to support prudent long-term decisions for the SLD and the Districts through the following: 1) eliminating rules that give certain funding preferences to lit over dark fiber; 2) maintaining the current rule prohibiting schools and libraries from building or owning their own Wide Area Networks; 3) spreading monthly costs over long term contracts shifting the capital burden to Service Providers rather than creating further complex prioritizations within existing Priority One services; 4) approving multi-year contracts only once rather than each year streamlining the processes for all involved; 5) identifying current and needed bandwidth for

¹ *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Notice of Proposed Rulemaking, 28 FCC Rcd 11304 (2013) (“E-rate Modernization NPRM”).

² *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Public Notice, DA 14-308 (rel. March 6, 2014).



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both Internet services and WAN services separately on each of the Form 470, Form 471, and Item 21 attachment, thereby increasing transparency and making it easier to understand Districts' needs and how they compare to the goals; 6) providing individual Districts equal opportunity for funding as consortium applicants to allow applicants the ability to choose the financial and purchasing options that best meet their needs; and finally, 7) making it clear that no District would be penalized by planning in advance for their WAN or technology needs that require time to deploy.

More transparency, streamlining the rules, maintaining individual District decision making flexibility, and focusing on longer-term contracts and funding commitments will encourage more schools to apply for funding, encourage more service providers to participate in the program, enable easier budgeting, and put E-rate funds to work building broadband connections for our nations' students while also maintaining the overall health of the fund.

Please direct any questions related to this submission to the undersigned.

Sincerely,

A handwritten signature in blue ink that reads "Matthew Van Hoesen".

Matthew Van Hoesen, JD, CPA
Chief Financial Officer/General Counsel

Enclosure

cc (via email): Lisa Hone
Charles Tyler
Best Copy and Printing, Inc.