Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Modernizing the E-rate Program	)	WC Docket No. 13-184
For Schools and Libraries	)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint"), in response to the Public Notice released March 6, 2014 (DA 14-208), hereby respectfully submits additional comments on how best to focus E-rate funds on high-capacity broadband, and whether and how the Commission should begin to phase down or phase out support for traditional voice services.

Sprint agrees that ensuring adequate broadband service to and within schools and libraries should be a top priority, and comments below on how to maximize the benefits of on-premises broadband service. However, it would be short-sighted and counter-productive to concentrate only on bringing broadband to the school, while completely ignoring the role of broadband in meeting the educational needs of students outside school hours and beyond school grounds. In an age of mobile digital learning, action – through the E-rate program and otherwise -- must be taken to support off-premises learning and to help ameliorate the digital divide.

I. MAXIMIZING THE BENEFITS OF BROADBAND SERVICE TO AND WITHIN SCHOOL AND LIBRARY PREMISES.

In the instant public notice (para. 4), the Commission has asked for comment on "how best to focus E-rate funds on high-capacity broadband, especially high-speed WiFi and internal connections." As previous comments in this docket have demonstrated, it is

critical that the Commission adhere to the long-standing principle of competitive and technological neutrality in its efforts to modernize the E-rate program.[1] The Commission should avoid adopting rules which tilt the playing field in favor of a particular technology or particular category of service provider; instead, the Commission must ensure that schools and libraries have the flexibility to select E-rate services which best meet their needs on a cost-effective basis. Thus, for example, the Commission should not assume that fiber is the best means of bringing broadband to the school; in fact, there will be many situations in which the costs of deploying a fiber network are too high to generate a reasonable return on investment. For example, for some rural community schools and libraries, wireless point-to-point connectivity will be more cost-effective and can be deployed more quickly and efficiently, and with far less disruption, than a wired solution.

The Commission also should provide E-rate applicants with sufficient flexibility to choose services which maximize the efficiency and effectiveness of in-building broadband service. In response to the Commission's request for comment on "what services, software, or equipment are necessary to enable high quality, high-capacity networks inside schools and libraries" (Public Notice, para. 12), Sprint strongly recommends that managed WiFi be deemed a supported service. Managed WiFi integrates hardware, software, network transport and professional integration solutions.[2] For some schools and libraries (particularly those that do not have staff to perform these

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[1] *See, e.g.*, comments filed by Sprint in WC Docket No. 13-184 on Sept. 16, 2013 ("Sprint Sept. 16 comments"), pp. 2-6.

[2] Managed WiFi provides on-going project management and professional services to manage, maintain and repair the school/library's network; image, launch and manage mobile devices; track assets; provide data usage monitoring and alerts; implement on-line safety and filtering features to help ensure CIPA compliance; provide a single point of contact for replacing or repairing mobile devices; and provide single point of contact Help desk support for both technical issues and account inquiries.

network and administrative functions entirely in-house), managed WiFi represents a cost-effective option for obtaining reliable, carrier-grade in-building connectivity.

II. E-RATE SHOULD ALSO SUPPORT MOBILE LEARNING

There is no dispute that on-line learning outside school hours can be extremely valuable at improving student performance, academic and otherwise. In recognition of this fact, and to help ensure that students (in particular, low income students) have the broadband tools they need to access educational material and to do their schoolwork after school and off school grounds, Sprint has committed to providing free mobile broadband service for 50,000 lines of service per year for 4 years to eligible K-12 schools as part of the national ConnectED initiative.

Although private initiatives such as Sprint's ConnectED offer will generate significant benefits, they alone are not enough. Off-campus mobile learning must also be fostered through public initiatives such as the E-rate program. Accordingly, a key element of the Commission's efforts to modernize the E-rate program must include expanded support for off-campus mobile broadband learning.[3] At a minimum, the E-rate program should support off-campus use for students and staff who lack broadband access at home.[4]

Making off-campus broadband service E-rate eligible offers many vital benefits. First, supporting mobile broadband learning will help boost academic achievement, motivate students, and increase the relevance of classroom lessons. Second, it will help to address, at least in part, the serious digital divide problem. Third, by making off-campus mobile broadband an eligible service, the Commission could then eliminate the

[3] Currently, the main off-campus mobile learning initiative under E-rate is the $10 million EDU 2011 Pilot Program.
[4] *See* Sprint's September 16 comments, pp. 9-11.

cost-allocation rule (which requires applicants to reduce their Internet access E-rate funding request by the amount associated with off-campus use), thereby streamlining the application process and reducing the administrative burden on E-rate applicants and USAC (two other goals of the E-rate modernization effort).

III. REDUCING SUPPORT FOR VOICE SERVICES.

In the instant Public Notice (paras. 40-49), the Commission has asked for comment on how to transition from funding voice telephony. Because of the lead time needed to implement new E-rate rules and conduct the competitive bid process, Sprint recommends that full E-rate support for voice services continue at least for the funding year after the date the new rule is adopted (that is, any new rule would become effective 2 years beyond the current year),[5] with multiyear contracts grandfathered under the current rules for the length of the contract, with a maximum contract length of 3 years. This gives both applicants and service providers advance notice of future reductions in support, and provides an opportunity to implement an alternative approach to meeting their voice telecommunications needs.

Should the Commission decide to phase out E-rate support for basic voice service, it should clarify that support will still be available for packet-based voice service (*e.g.*, voice over LTE or high definition voice), since such service is simply one more application on a data network.

[5] Applicants and service providers are now processing service requests/RFPs for the upcoming funding year (2014-15). Thus, any new rules adopted by the Commission relating to phase down or phase out of voice services could not reasonably be reflected until the subsequent funding year cycle (2015-16, or current year +2).

Respectfully submitted,

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