



Harlandale I.S.D.

Office of the Director of Information Services

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Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

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FCC Administration:

On behalf of the Harlandale Independent School District, San Antonio, Texas, its students, the community, faculty and staff, I am writing to express our continued support of the E-Rate program, and to provide responses to the three areas which were addressed in the FCC's Public Notice: *Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization*. Additionally, I will address our concern over the FCC's decision to deny all Year 16 Priority 2 (P2) funding request.

We wholeheartedly support the infusion of \$2 billion into Priority 1 to provide much-needed expansion, repair and improvements. The need to provide effective access to technology for students across the country is a critical issue that involves us all. It was, however, WRONG to deny the Year 16 P2 requests. The FCC must recognize that school districts around the nation rely on E-Rate funds to support the expansion and basic maintenance of internal connections and technology infrastructure. It is, the P2 monies that physically bring the high-speed broadband connectivity into the classroom. Over the past 17 years, school districts nationwide have come to rely on the P2 funds. How then, can they be asked to supplement this funding when it was taken so quickly and so very late in the school/budget year? The FCC's decision has created a fiscal nightmare for many school districts throughout the Nation. The first order of business must be to reinstate the P2 funding if only for this year. Schools will work diligently to find or reallocate funding for the purchase of internal connections and basic maintenance in future years.

Regarding the three issues on which the FCC is soliciting feedback, we offer the following comments:

(1) *ensuring that schools and libraries have affordable access to 21st Century broadband that supports digital learning*

- In Priority 1, let's focus on high-speed Internet access.
- The E-Rate program should pay for ALL schools and libraries with valid applications at the 90% discount rate.



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(2) *maximizing the cost-effectiveness of E-rate funds –*

- Let's make P2 available two out of eight years instead of two out of five
- Focus on only two areas – wireless acquisition/wireless maintenance AND Internet content filtering

(3) *streamlining the administration of the program -*

- Minimize the cost and time burden to program administrators by streamlining administrative processes.
- All Priority 1 approvals must be for a period of three years. Schools and libraries will not need to submit annual applications once the request is approved and funded.
- When you apply the time frame suggested above for Priority 2, there will be a total of only 2 E-Rate submissions in any given four year period (versus seven submissions in a five year period).

The FCC must understand that technology has driven the information revolution and schools must adapt for students to be successful. With that in mind, we strongly urge that the program budget cap be increased to \$5 billion annually to better meet the demand for **P1 and P2 services**.

The FCC through E-Rate has 17 years' worth of incredible data on technology in our country's schools & libraries that they can crunch and make available. They could probably serve up a pretty good set of engineering guidelines to help reach the fast connection/fast delivery goal.

Respectfully,

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