

Thank you for this opportunity to comment on the FCC Notice of Proposed Rulemaking released on July 23, 2013 regarding the Modernizing the E-rate Program for Schools and Libraries (WC Docket No. 13-184). I am a consultant who works with several libraries in WA State and have been working with the E-rate program since shortly after its inception.

I strongly urge the Commission to provide funding at the \$5 billion level to more adequately match the funding request levels that the Universal Service Fund has received during the past few years. The technology environment has changed dramatically since 1998 and the original design of the E-rate administration and its funding caps are not keeping up with these changes.

Furthermore, the demand for computer services and internet access by library patrons has also grown during this time period and libraries are challenged to keep up with the greater bandwidths that are required to keep our patrons connected to the educational materials, job search tools, medical information, government services, etc. that they need to survive and thrive in today's world.

I would like to highlight a great success story for the Kitsap Regional Library (KRL) where E-rate and other federal grant funds were used to install fiber for broadband service with speeds of 100 mbps to many of the library's branches. A consortium of partners including a local public utility district, hospitals, schools and the Library received federal broadband stimulus grant funds to install a new fiber network in our region. Kitsap Regional Library is able to pay for the monthly service fees from this network using E-rate funds. KRL had evaluated fiber installation 5 years ago, but could not move forward with this project, despite the library's inability to keep up with the capacity needs, because of the excessive costs for installation and ongoing service. With the recent E-rate rule change allowing any entity to provide fiber service, the library was able to join this consortium's network. Current E-rate Priority 1 funding allows them to sustain this service on a monthly basis.

I support several of the proposals to streamline the administration of the E-rate program as listed below. I have also added a few more ideas based on conversations, questions and materials presented at the Fall Training Seminar in Portland, Oregon.

1. BEAR Form Comments:
  - a) Send funding disbursements from approved BEAR forms directly from USAC to applicants;
  - b) Modify the BEAR form to allow applicants to indicate when they are submitting the final BEAR form for an FRN for that year; a simple checkbox could eliminate the need to file a form 500 and release the excess funds into the carryover pool sooner than currently experienced.
  - c) Modify the BEAR form to populate the form with the FRN funding commitment amount, and if feasible, also show the remaining balance on the FRN. This facilitates communications between the BEN and SPIN (or USAC) regarding the actual amount of the check that is due.
  - d) Modify the BEAR form to include a check box if the name and/or address for the remittance is the same as the person certifying the form. This will reduce a significant amount of duplicative data entry.

- e) Modify the BEAR Home Page to more clearly indicate the BEAR Approval Status. The current status options are very confusing. Status recommendations are: Draft/Not submitted by Applicant; Submitted/Certified by Applicant; Certified by SPIN; Approved by USAC.
  - f) Modify the Comments text field at the bottom of the BEAR form so that the typed letters can all be viewed and edited. It currently only shows a small portion of the comment at a time in the edit mode.
  - g) The BEAR form currently requires the person with the signing authority to enter their PIN before any data entry can be done. The PIN should be required upon certification and submittal like all the other forms.
2. Item 21 Attachments:
    - a) Since the Block 5 section of the 471 will now include number of lines and speeds, can you add a descriptive field or pull-down menu and then eliminate the need for the Item 21 Attachment? There is a very significant amount of time spent in duplicative data entry for this Attachment.
    - b) If the Attachment cannot be eliminated altogether, can you allow access to it prior to the submission of the 471 form? This would allow some data entry to be completed earlier in the process, which is especially important for applications that are submitted during the last week or two of the filing window when the systems are overloaded.
    - c) The Item 21 Attachment currently only shows the pre-discount amount, which can make cross-checking for accuracy difficult.
  3. Allow funding requests for multi-year contracts up to 3 year terms to be made with a single multi-year FRN; however, do not make this mandatory because the complexity of contracts and services varies and it may not be feasible to make a projection 4 years in advance;
  4. Eliminate the requirement for cost allocation of off-site use of approved internet devices; some libraries are moving toward a more cost effective approach than bookmobiles by providing limited library services to remote patrons at community and senior centers with laptop computers and a smaller van to deliver ordered materials.
  5. Make electronic filing and especially electronic notifications from USAC mandatory; Divert the paper and postage savings at USAC into more funding awards to applicants;
  6. Make the Form 500 available on-line;
  7. Add both a Save and a Print/Preview option to every screen of all online forms. Currently, you need to scroll through countless screens to see a draft of the completed form. I believe on the 470 form, you even have to re-enter the signer's email address twice in order to scroll to the screen to view a completed draft of a form.
  8. Eliminate the 486 form and add the start date, Tech Plan approval/waiver, and CIPA certifications to the 471 or BEAR forms;
  9. Make past application information available on-line;
  10. Improve the transparency of the review process with more descriptive application status labels;
  11. Impose deadlines for the entire application review process so that applicants receive funding decisions much earlier than is currently experienced;
  12. Post deadlines for each phase of an individual application under review (many applications are routinely listed as in "Initial Review" for several months with no contact between USAC and applicants);

13. Post video presentations (like the one shown at the training seminar) with the summary of the NPRM on your website. This would likely result in your receiving more substantive comments from your stakeholders.

I would also like to express my disagreement with a few of the proposals as follows:

1. Please do not increase the document retention period to 10 years - this seems excessive, especially if more documents can be made available on-line;
2. Please do not require an officer of the Service Provider or Billed Entity to sign off on all E-rate forms - this would significantly hinder and slow down the administration and processing of forms;

I respectfully request that any changes made to the eligible services list that would significantly reduce funding to an applicant be further studied. Applicants must be given the opportunity to calculate and plan for any elimination of funding. I was unable to determine the financial impacts from my clients based on the posted NPRM. For example, if telephone services were no longer eligible, my clients' Information Technology budgets would be seriously affected and they would need to reappropriate funds and/or delay other projects to cover that funding gap. This could detrimentally impact other IT projects and in the end could hinder the goals of the E-rate program.

I would also like to see more information on the plans to increase the redistribution of funds from Urban to Rural areas before any final decisions are made. If you are making changes to the discount structure, we request that you also factor in another disparity in funding distribution for libraries. For example, most libraries have never been eligible for the highest discount levels and therefore have never received Internal Connections funding.

We ask that you give special consideration to the important technologically dependent services provided by libraries. Much of the NPRM and comments have been focused on the issues with schools, however, more attention and research should be given to the great success the E-rate program has achieved in addressing the technology divide through programs at our libraries. Please ensure that these important services offered at libraries can be maintained, if not increased, so that the goals of E-rate can extend not just to our youth in schools, but to our entire communities.

Thank you for allowing me to comment on the proposed changes to the E-rate program.

Sincerely,

Claire O'Flaherty  
Consultant, E-Rate Expertise, Inc.