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") hereby respectfully submits its comments in response to the Public Notice released on April 18, 2014 (DA 14-522) in the above-captioned proceeding. In this Public Notice, the Commission has asked for comments on a request by the Institute of Museum and Library Services (IMLS) to access information submitted by E-rate applicants in FCC Form 471 Item 21, as well as funding request number (FRN)-level data. Sprint's comments are limited to the request for FRN-level data.

Sprint opposes IMLS' request for FRN-level data, for three reasons. First, the requested information includes proprietary and commercially sensitive data submitted by individual service providers to E-rate applicants in response to their specific RFPs, such as the prices (recurring and non-recurring) charged by the service provider. The FRN-level data also includes CPNI for the identified school or library, including its service configuration (e.g., number of lines or mobile devices on the account, term/number of months), as well as other sensitive customer-specific data, such as billing information (usage and costs incurred, adjustments for ineligible usage). To protect both

commercially sensitive data and CPNI, the Commission should, at most, provide aggregated (non-customer specific, non-service provider specific) information to IMLS.

Second, it is not clear to Sprint how the disaggregated data will assist IMLS in its analysis of "national needs and trends in libraries and museums,"[1] or indeed, what needs and trends IMLS is attempting to evaluate. The E-rate program is relevant to only a very limited range of all of the goods and services which libraries need to function effectively (E-rate support is available only for certain telecommunications and Internet access service requests), and it is Sprint's impression that only a relatively small percentage of libraries (and no museums) even participate in the E-rate program. Before releasing the requested information, the Commission should obtain a more detailed explanation from IMLS about the scope of its study, why the requested information is relevant to that study, and whether IMLS believes the requested information is sufficiently representative of its members'/constituents' needs to form the basis of any conclusions.

Third, IMLS' data request is over-broad. IMLS describes itself as "an independent Federal grant-making agency and the primary source of federal support for the Nation's libraries and museums."[2] As such, there is no reason to give IMLS access to E-rate information pertaining to schools. Should the FCC grant IMLS' request, it should at most provide aggregated data on the E-rate funding requests submitted by libraries, not by schools.

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[1] *See* letter from Carlos Manjarrez, IMLS, to Julie Veach, FCC, dated April 14, 2014.
[2] *Id.*

Respectfully submitted,

SPRINT CORPORATION

/s/ Charles W. McKee

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