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ARIN IU 28
ARIN Intermediate Unit
2895 W Pike
Indiana, PA 15701-9769

Regional Education Service Agency
Phone: 724-463-5300
FAX: 724-463-5315
Email: info@iu28.org
Website: iu28.org

Received & Inspected

APR - 7 2014

FCC Mail Room

March 31, 2014

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Sir/Madame,

As E-Rate funding is crucial to the operation of our programs and the public schools which we serve, I am writing today to comment on E-Rate Modernization.

It is our desire that the number one focus of the E-Rate program be connectivity. In a rural area such as ours we are fortunate that our schools have been able to "get connected" in this digital world and E-Rate has been critical in those efforts. There are five very important things to keep in mind however as we go forward and they are:

1) The cost of keeping those connections competitive and up-to-date. We are all well aware of how quickly technology is changing and the need to replace and up-date our infrastructure. If we fail to do so then we (teachers, students and administrators) are often not able to utilize current technology. Up-dating that infrastructure even every 7-10 years is a daunting task and E-Rate funding is critical to make that a possibility.

2) In this rural area staying connected with our families is critical and cannot be accomplished without basic voice technology. Many of our families do not have access to internet or cell phone coverage and the possible reduction, or even elimination of, E-Rate funding for voice services should not be considered at this time.

3) Pricing for some services has been coming down, especially when services can be purchased via a consortium. In a time of limited resources we must find ways to reward those entities that are making these limited resources go further.

4) Every dollar spent on complying with administrative concerns reduces the amount of money available for direct services. Just as we are pursuing consortiums and other avenues to better utilize funds then you, the FCC, should set a goal of reducing the cost to comply with E-Rate funding by 33%. While compliance is important and should be continued, a 33% reduction in costs associated with compliance should be deemed the minimum acceptable level.

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5) Until new money, renewable as well, is appropriated for this program, existing funds should not be diverted to new/additional programs until the basic goals of connectivity and sustainability are accomplished. If a new program is really worthwhile, and I am sure there are many of them out there, then find savings in administrative costs to pay for them; please don't attempt to pay for them at the expense of basic services that could never have been started, nor can they be continued, without E-Rate finding.

Sincerely Yours,

James J. Wagner
Executive Director

c: The Honorable Robert P. Casey, Jr.
The Honorable Patrick J. Toomey
The Honorable Mike Kelly
The Honorable Keith Rothfus
The Honorable Bill Shuster

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Queen City Independent School District
1015 Houston Street
Queen City, Texas 75572

Received & Inspected

APR - 7 2014

FCC Mail Room

13-184

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

March 31, 2014

Dear Sir or Madame,

I am writing today in response to the FCC's Public Notice (PN): Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization which, among other things, examines how to distribute $2 billion in found funding for the E-Rate program. The E-Rate program currently represents the only source of federal funding aimed at educational technology and it critical in providing discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

Our district is a small, rural one with around 1000 students. Over 50% of our students are economically disadvantaged. E-rate dollars enable our district to receive services, especially broadband internet services, which we could ill afford without E-rate.

As the FCC moves forward with this PN, we urge you to ensure that changes to modernize the program are focused on expanding a successful program that has yet to reach its full potential. E-Rate has served as the cornerstone to the rapid and dramatic expansion of school and library connectivity. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step the FCC can take to bolster E-Rates current and future success is to provide $5 billion in funding, an amount commensurate with current demand. The final proposal must include both programmatic restructuring and a permanent increase in the program's funding cap. Quite simply, an infusion of funding without programmatic restructuring is a poor investment, and programmatic restructuring without permanent, adequate funding sets the program on a path towards instability and failure.

The $2 billion (over two years) in found funding for E-Rate is a strong step in the right direction, as is focusing the funds on Priority Two (internal connections). Connectivity is an annual expense, though, and I am concerned that the proper focus on modernization and build out will come with sustained increased program demand that far exceeds the current program funding level and the inevitable funding cliff that will come when the $2 billion is spent down. In fact, the most recent application cycle for E-Rate (closing March 26, 2014) totaled more than $2.225 billion for one year, already exceeding the $2 billion the FCC proposes for two years.

It is my hope that the final changes to the E-Rate program position to program to continue to fulfill its original promise of connectivity in the broader context of equity, local decision making, and technological neutrality. More specifically to the FCC's proposal:

- Support technological neutrality: Technological neutrality (allowing a variety of technologies as opposed to prescribing a limited number) and local decision-making are an efficiency: Local school system and library leaders are best positioned to know their respective technological needs, the process for implementing the

technology plan, and the related costs. Tech neutrality and local decision making empower districts like mine to maximize the benefit of E-Rate dollars, for connections both *to* and *within* schools and libraries.

- Oppose any effort to set aside a specific portion of E-Rate dollars for Priority Two: The concept of a carve out/set aside for Priority Two sets up the very real threat of 'robbing Peter to pay Paul', whereby the set aside for Priority Two would encroach on Priority One, leaving both priorities to be rationed.
- Oppose any proposal that would distribute E-Rate funding on the basis of a per-capita (ie, per-student) basis: Beyond an inability to recognize high-cost service factors that often impact rural and small schools, a per-capita approach is a step away from E-Rate's historical focus on equity. As both AASA and AESA wrote in their comments, "Concentration of poverty is reflected in the percentage of eligibility, as opposed to a straight count of students in poverty. That is, 100 low-income students in a district of 1,000 students is a different level of poverty than 100 low-income students in a district of 10,000. Specific to the idea of a per pupil cap: With a historic focus on concentrations of poverty, the very act of diluting funding to a pupil (or class, or building) level is antithetical to combating concentrations of poverty. It reflects the presence, but not necessarily the concentration, of poverty. Per capita limits are poor proxies for ensuring that funds remain targeted on the neediest populations."
- Support Streamlining Administrative Process: Streamlining of the administrative process including online filing and reduced administrative burden[1], as well as allowing for multi-year applications and providing an 'EZ' renewal form for applicants making no changes to a previous year's application.
- Support Voice Services: Voice remains an important E-Rate service for schools and libraries. Removing voice services from the eligible services list does not negate my district's very real need for working phones, for everything from simple contact to emergency communication. The shift would translate into increased fiscal pressure on my district's budget.
- Oppose demonstration projects within E-Rate funding: Any of the pilot projects siphon limited dollars away from the historically oversubscribed E-Rate program. Any incursion on the E-rate program – whether it be from a new service, a new class of applicants, or a new program (as the proposed pilot would be) – would significantly destabilize the program.

Students graduating from our district need to be as prepared for the post-secondary world as much as any other student in the United States! Without E-rate, our district cannot provide the services needed, though, to prepare our students to be college or career ready. Without E-rate funds, we would have to consider cutting instructional materials or staff in order to pay for broadband coverage. We realize that E-rate is oversubscribed and underfunded so please provide the needed additional funds.

Thank you for considering my response as you move forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved.

Sincerely,

Angela Gutsch

Angela Gutsch Ed.D.
Superintendent
Queen City ISD

[1] See AASA/AESA Joint Filing, Aug 27, 2013 http://aasa.org/uploadedFiles/Policy_and_Advocacy/files/AASA%20E-Rate%20NPRM%20Comments%20081613.pdf

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Fannindel ISD
601 West Main
Ladonia, Texas
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Received & Inspected

APR - 7 2014

FCC Mail Room

March 31,2014

Dear Sir/Madame,

I am writing today in response to the FCC's Public Notice (PN): Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization which, among other things, examines how to distribute $2 billion in found funding for the E-Rate program. The E-Rate program currently represents the only source of federal funding aimed at educational technology and it critical in providing discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.
Fannindel is a small rural school with 80% of its students on free lunch.

As the FCC moves forward with this PN, we urge you to ensure that changes to modernize the program are focused on expanding a successful program that has yet to reach its full potential. E-Rate has served as the cornerstone to the rapid and dramatic expansion of school and library connectivity. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step the FCC can take to bolster E-Rates current and future success is to provide $5 billion in funding, an amount commensurate with current demand. The final proposal must include both programmatic restructuring and a permanent increase in the program's funding cap. Quite simply, an infusion of funding without programmatic restructuring is a poor investment, and programmatic restructuring without permanent, adequate funding sets the program on a path towards instability and failure.

The $2 billion (over two years) in found funding for E-Rate is a strong step in the right direction, as is focusing the funds on Priority Two (internal connections). Connectivity is an annual expense, though, and I am concerned that the proper focus on modernization and build out will come with sustained increased program demand that far exceeds the current program funding level and the inevitable funding cliff that will come when the $2 billion is spent down. In fact, the most recent application cycle for E-Rate (closing March 26, 2014) totaled more than $2.225 billion for one year, already exceeding the $2 billion the FCC proposes for two years.

It is my hope that the final changes to the E-Rate program position to program to continue to fulfill its original promise of connectivity in the broader context of equity, local decision making, and technological neutrality. More specifically to the FCC's proposal:

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- Oppose any effort to set aside a specific portion of E-Rate dollars for Priority Two: The concept of a carve out/set aside for Priority Two sets up the very real threat of 'robbing Peter to pay Paul', whereby the set aside for Priority Two would encroach on Priority One, leaving both priorities to be rationed.
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in their comments, "Concentration of poverty is reflected in the percentage of eligibility, as opposed to a straight count of students in poverty. That is, 100 low-income students in a district of 1,000 students is a different level of poverty than 100 low-income students in a district of 10,000. Specific to the idea of a per pupil cap: With a historic focus on concentrations of poverty, the very act of diluting funding to a pupil (or class, or building) level is antithetical to combating concentrations of poverty. It reflects the presence, but not necessarily the concentration, of poverty. Per capita limits are poor proxies for ensuring that funds remain targeted on the neediest populations."

- Support Streamlining Administrative Process: Streamlining of the administrative process including online filing and reduced administrative burden[1], as well as allowing for multi-year applications and providing an 'EZ' renewal form for applicants making no changes to a previous year's application.
- Support Voice Services: Voice remains an important E-Rate service for schools and libraries. Removing voice services from the eligible services list does not negate my district's very real need for working phones, for everything from simple contact to emergency communication. The shift would translate into increased fiscal pressure on my district's budget.
- Oppose demonstration projects within E-Rate funding: Any of the pilot projects siphon limited dollars away from the historically oversubscribed E-Rate program. Any incursion on the E-rate program – whether it be from a new service, a new class of applicants, or a new program (as the proposed pilot would be) – would significantly destabilize the program.

Thank you for considering my response as you move forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved.

Sincerely,

H. L. Milton
Superintendent

13-184

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Soap Lake School District No. 156
410 Gingko St S
Soap Lake WA 98851
509.246.1822 509.246.0669 Fax

Received & Inspected

APR - 7 2014

FCC Mail Room

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

March 31, 2014,

Dear Sir/Madame,

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Our district is a rural district in the North Central Washington State. It is 100% free and reduced, with high unemployment, poverty, and single parent families. Our tax base is quite small and quite poor with the average income in $18-20,000 range. When we say that the E-Rate program is the only source of federal funding aimed at educational technology, we literally mean that. If we can't get low rates or discounts, we cannot afford the necessary computer hardware or internet access points to sustain a viable online or computer lab structure.

As the FCC moves forward with this PN, we urge you to ensure that changes to modernize the program are focused on expanding a successful program that has yet to reach its full potential. E-Rate has served as the cornerstone to the rapid and dramatic expansion of school and library connectivity. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding.

The single most effective step the FCC can take to bolster E-Rates current and future success is to provide adequate funding, that is commensurate with/and includes both programmatic restructuring and a permanent increase in the program's funding cap. We understand that an infusion of funding without programmatic restructuring is a poor investment, and programmatic restructuring without permanent, adequate funding sets the program on a path towards instability and failure. We do not want to see that scenario played out.

The $2 billion (over two years) for E-Rate is a strong step in the right direction, but a concern I have is the funding cliff that looms as we draw-down the present allotment and there is still a huge demand for services with Priority Two (internal connections)needs. Connectivity is an annual expense, though, and I am concerned that the proper focus on modernization and build out will come without sustained increase in program funding levels. In fact, the most recent application cycle for E-Rate (closing March 26, 2014) totaled more than $2.225 billion for one year, already exceeding the $2 billion the FCC proposes for two years.

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Thank you for considering my response as you move forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved. Please remember that this huge change in the E-Rate program will impact Soap Lake in a very BIG way. We are aware that change has to come, but we implore you work to change the underfunded nature of this oversubscribed programs so that the application process is streamlined and the overall program is level funded, which would be the best thing you could do for school-aged kids across this fine nation of ours.

Sincerely,

Danny D. McDonald
Superintendent of Schools

The attached document is part of a mass mailing. The number of identical documents as specified in the File Number/City, St. field have been received by the Commission on this same date. You may view the documents at the FCC Reference Information Center, at 445 12th Street, SW, Washington, DC, Room CY-A257.