

Miami-Dade County Public Schools

giving our students the world

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May 21, 2014

Mr. Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Wheeler:

Miami-Dade County Public Schools (M-DCPS) has been a strong supporter of the federal E-rate program since its inception in 1998. Our participation in key conferences and at multiple Federal Communications Commission (FCC) meetings illustrates our commitment to a program that has served M-DCPS students well throughout the years. M-DCPS agrees with the FCC's initiative to create a modernized E-rate 2.0 program. Our response to the FCC's Public Notice (WC Docket No. 1-184, dated April 7, 2014) outlined our suggestions to bring about the necessary program changes. For example, M-DCPS strongly supports initiatives to:

- Support the President's Broadband initiative to be compliant by 2017 without the need to impact major changes to the E-rate program;
- Allow school districts to determine how E-rate funds will be spent, based on local needs;
- Maintain the flexibility of individual school districts to evaluate their needs for voice services;
- Increase the current E-rate funding cap; and
- Distribute E-rate funds equitably, using the current discount matrix and a per-student allocation.

M-DCPS believes that individual districts are uniquely positioned to determine which technological advancements will best serve their students and communities. In contrast to M-DCPS' position, the Alliance for Education and the Education Superhighway support a national E-rate database that evaluates each school site based on generic connectivity goals rather than local districts' needs. This approach ignores the practical realities of local differences.

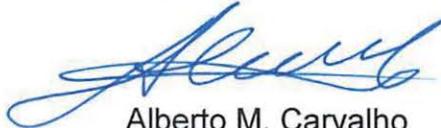
The Alliance for Education also recommends that support for local telephone service be limited or completely removed. Implementation of this proposal would have at least a \$2 million yearly impact on M-DCPS, not including the multi-million dollar cost of transitioning to a VoIP platform.

Finally, M-DCPS disagrees with the suggestion that consortia applications receive higher funding priority than school district applications. A policy in which school districts would cede local control to a consortium in order to receive E-rate discounts would make it difficult for most large school districts to manage their funds effectively. Technology integration plans, including the timing and procurement of IT goods and services, should remain a local prerogative and process.

I am requesting the opportunity to meet with you before the E-rate 2.0 program is unveiled to outline M-DCPS' position regarding the proposed changes. I would be happy to meet with you in Washington, DC, or host you in Miami where you will be able to observe first hand all of the benefits the E-rate program has provided to M-DCPS.

If you have any questions, please contact Ms. Deborah Karcher, Chief Information Officer, Information Technology Services, at 305 995-3754.

Sincerely,



Alberto M. Carvalho
Superintendent of Schools

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cc: Superintendent's Cabinet
Ms. Debbie Karcher