June 3, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communication Commission
445 12th Street SW
Washington, DC 20554

Re: Notice of *Ex Parte* Communication, WC Docket No. 13-184

Dear Ms. Dortch:

On May 30, 2014, Bob Walton and Tim Williams of the Worcester (MA) Public Schools spoke via telephone with Soumitra Das and Chas Eberle of the Wireline Competition Bureau and Michael Steffen of the Office of Managing Director. The purpose of the call was to discuss cost data from recent wireless local area network (WLAN) upgrades in the district's schools and the district's network design and broadband infrastructure planning.

Worcester has approximately 25,000 students in 50 schools. Of those schools, 32 currently have building-wide WiFi coverage but only one, Thorndyke Road Elementary, has WiFi capable of supporting a 1:1 device program. The remaining schools have few if any wireless access points (WAPs). Mr. Walton noted that district deployed its existing WiFi infrastructure using Priority 2 E-rate funding, which it has not received in four years. Worcester qualifies for an 83% E-rate discount.

Mr. Walton explained that he presumes Worcester will not receive any Priority 2 funding for FY2014, so his funding request to the school board for 2014/2015 focused on deploying WiFi to those schools with on coverage and upgrading those with limited coverage. The budget request was $700,000/yr. for six years, Mr. Walton will follow up with additional details on how those funds were allocated. The school board did not provide funding.

FCC staff asked about the higher costs and unique challenges associated with WLAN upgrades in older school buildings such as Columbus Park Elementary. Mr. Walton explained that the biggest factors driving costs in old buildings are the lack of drop ceilings and chaseways between floors. Another common challenge is retermination of old cable runs that originally ran all the way from a wired drop to the edge router and adding patch panels to improve cabling efficiency. For Columbus Park, the upgrade planned for 35 WAPs to cover 21 classrooms and all common areas. Worcester defines "classrooms" based on the number of homerooms. The total estimated installation costs for the school was $10,150. Worcester contracts WLAN installation to an outside vendor. Mr. Walton concluded that WiFi upgrade costs in Worcester vary because each school has a unique physical layout and structural challenges.

Respectfully submitted,
_____/s/_____
Charles Eberle
Attorney-Adviser, Telecommunications Access Policy Division, Wireline Competition Bureau