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Via ECFS

The Honorable Thomas Wheeler, Chairman
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Reform of the E-Rate Program (WC Docket No. 13-184)*

Dear Chairman Wheeler:

In this proceeding, Cisco Systems, Inc. ("Cisco") has presented a significant amount of information and a number of recommendations based on its experience working with schools and libraries that are on the front lines of the revolution in online digital education. In our interactions with educators, we hear frequently about their need to deliver greater bandwidth to the fingertips of students and library patrons. Without a doubt, our educational customers find that the biggest barrier to achieving their goals is the inability to provide adequate connectivity *within* school and library buildings. For educators, the Wi-Fi gap is clearly even larger than the broadband gap.

The reason for the persistent lag in internal networking is no mystery: The priority system in the E-rate program systematically underinvests in internal connections, including Wi-Fi. As the Commission itself has catalogued, in recent years the program has provided little or no support for internal connections, and any small amount of available support has flowed to a limited subset of the needy schools and libraries around the country. Because the program as a whole has been underfunded for many years, the priority system has created a less and less funding for connecting students and teachers in classrooms, while fully funding connections to the schools.

A number of proposals are on the table to address this problem. Cisco and many other commenters have advocated eliminating the priority system altogether, while other commenters have favored some kind of set-aside for priority 2 funding. The Commission must adopt new rules that provide a permanent and reliable source of funding for internal connections for all eligible schools and libraries.

There are many aspects of the E-rate program that will benefit from reform, but none is as urgent as reform of the priority system for internal connections funding. American educators' ability to participate in the digital learning revolution will be irretrievably delayed unless a reliable funding source for internal connections is in place for the 2015 E-rate funding year.

