Wireless

A Sprint Company

Wireless Services and E-rate Reform

Docket Number WC 13-184
June 18, 2014

SouthernLINC Wireless is Committed to Serving Customers in Rural Areas

- SouthernLINC Wireless is a regional wireless carrier that focuses on serving rural markets
- Our service is designed to reach all rural areas, not just the highway corridors
- Our customers include:
  - local and state government institutions throughout Alabama and Georgia,
  - public utilities and emergency services, and
  - over 80 schools

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We Know Rural Challenges

- We know the importance of wireless services and E-rate funding to rural communities and schools
- We know the challenges rural schools face to fund the specific services they need
- We are the type of carrier from which Congress intended schools and libraries to receive communications services at affordable rates

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Achieve the Goal of Effective E-rate Operation

- The public interest is best served by an effectively operated E-rate program that
  - *maximizes the cost-effectiveness* of program funds, and
  - utilizes *streamlined* and *simplified* program administration
- A fully effective E-rate program requires continued support for wireless services

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Wireless Services are Vital to the Success of the E-rate Program

- E-rate support for wireless services must be preserved
- Broadband and VoIP services cannot fully replace wireless services for all schools
- Without support for wireless services, many rural schools will lose the best and most efficient means of *achieving their individual educational goals* and *maintaining safe environments*

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Serve E-rate Goals by Supporting Wireless Services

- Achievement of two cornerstone goals of the E-rate program - (1) self determination and local discretion and (2) competitive and technological neutrality - mandates support for wireless services
  - Continue to maximize local discretion in line with the Joint Board's recommendations
  - Self-determination leads to the most efficient use of E-rate funds
  - Self-determination allows the FCC to achieve its goal of technological neutrality, and vice versa

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Utilize Local Discretion and Self-Determination to Ensure Effective E-rate Support

- Individual schools and libraries are in the best position to know their own specific needs
- As the FCC correctly stated in 1997:
  - "[T]he establishment of a single set of priorities for all schools… would substitute our judgment for that of individual school administrators… *preventing some schools… from using the services that they find to be the most efficient and effective* means for providing the educational applications they seek to secure."

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Maintain Self-Determination to Fulfill Program Goals

- "Schools and libraries should have *maximum flexibility* to purchase the package of services they believe will *most effectively meet their communications needs.*"
  - Different technologies meet different needs for different schools
- Let schools and communities decide which services are most needed locally
- Consider a "whole network" approach
  - Allow applicants to design and maintain networks to suit their own needs
  - Make tools available on an individual, as needed basis

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Promote Local Judgment Rather than "a Single Set of Priorities"

- The FCC should not ignore local needs in favor of centralized planning
  - "[I]ndividual schools… are in the best position to evaluate the relative costs and benefits of different services and technologies."
  - Limiting wireless support would make those services unobtainable for many communities and schools
- Do not waste investments that rural schools have made in wireless communications
  - Do not make existing service choices unaffordable and deprive local schools of upgrade opportunities

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Maintain Competitive and Technological Neutrality in Guiding E-rate Reform

- "The Commission should neither unfairly advantage nor disadvantage one provider over another, *and neither unfairly favor nor disfavor one technology over another*."
- Technological neutrality is an E-rate cornerstone
  - Elimination of wireless support in favor of broadband is not competitively or technologically neutral
  - Avoid supporting wireline services to the exclusion of wireless services, and vice versa

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Employ Technological Neutrality in Practice

- An E-rate approach that excludes wireless devices and connectivity would be obsolete before enactment
- Instead, E-rate should allow for a wide-ranging mobile broadband education toolkit
  - Promotes availability of every component and supports a broad range of services
  - Allows for maximized local discretion to meet specific needs

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Establish a Broadband Education Toolkit for Maximum E-rate Efficiency

- E-rate reform should support wireless voice and data along with broadband and other services for maximum education connectivity
  - This approach will allow for deployment of 3G and 4G mobile broadband and wireless networks
  - A broad approach will lead to cost reductions in mobile broadband-enabled devices and promote digital learning
  - Wide-ranging support will let schools maintain investments already made and allow for future improvements

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Maintain E-rate Support of Wireless Services

- Maintain E-rate support for wireless services to allow local communities to make efficient choices
- There is no compelling reason to eliminate support for wireless services
- Limits to wireless E-rate support would not be competitively or technologically neutral
- Limits to or elimination of wireless support would result in unnecessarily increased local costs

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Thank you

Please let us know if you have any additional questions

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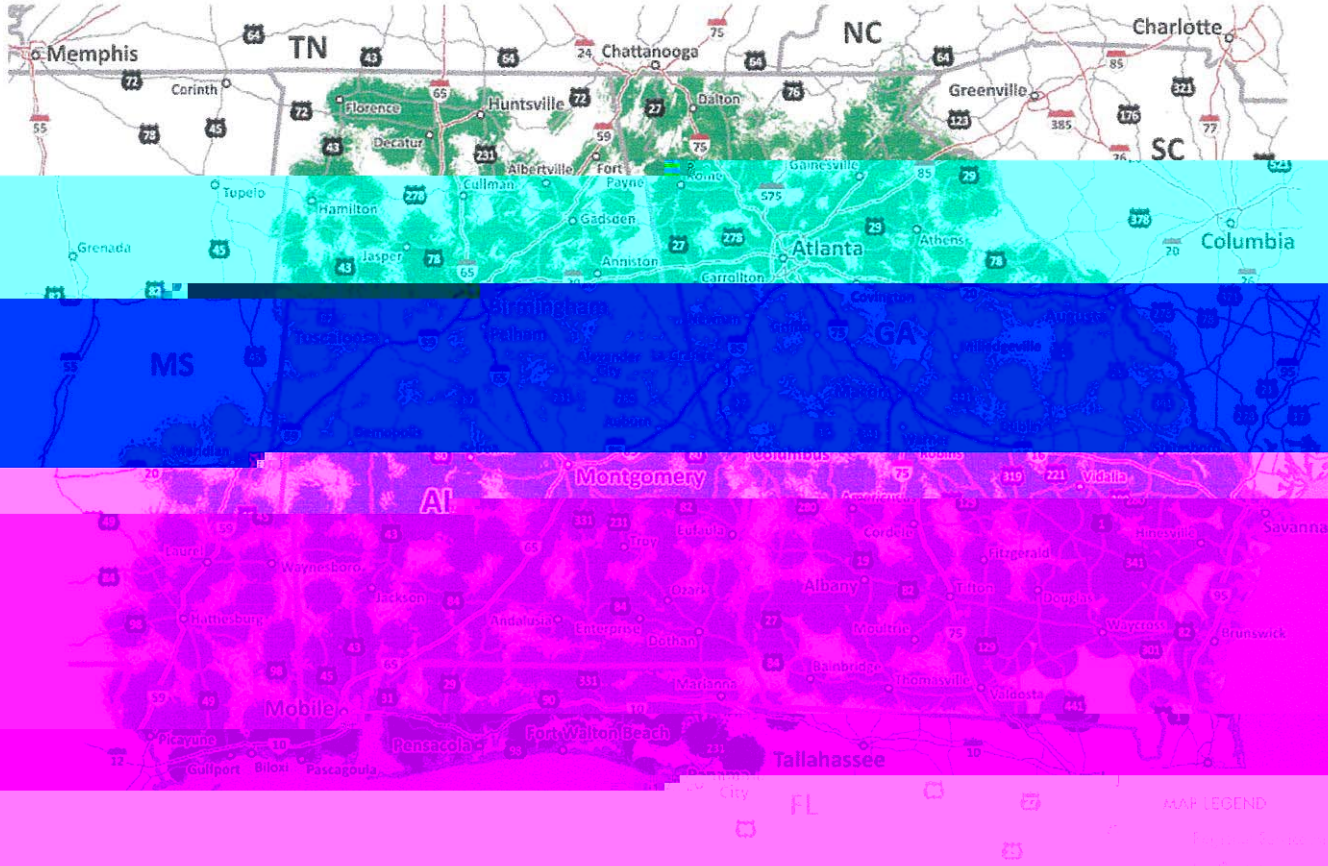
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