

July 2, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte Communication in *In Re Modernizing the E-rate Program for Schools and Libraries*, WC Docket 13-184

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, the undersigned hereby provides notice that on June 30, 2014, Alex Hoehn-Saric, Senior Vice President, Government Affairs of Charter Communications, Inc. ("Charter") and I of Davis Wright Tremaine, Inc. met with Nicholas Degani, Legal Advisor to Commissioner Pai on wireline matters. In addition, on July 1, 2014, Mr. Hoehn-Saric and I met with Rebekah Goodheart, Acting Legal Advisor to Commissioner Clyburn on wireline matters. Further, on July 2, 2014, Mr. Hoehn-Saric and I met with Amy Bender, legal advisor to Commissioner O'Rielly for wireline matters and, in a separate meeting, with Daniel Alvarez, legal advisor to Chairman Wheeler for wireline, public safety, and homeland security matters. Finally, on July 2, 2014, I also met with Priscilla Argeris, Legal Advisor to Commissioner Rosenworcel for wireline, broadband, universal service, and consumer issues, on behalf of Charter.

Charter fully supports the Commission's efforts to modernize the E-rate program, particularly efforts to ensure that schools and libraries have affordable access to broadband that supports digital learning and to streamline the administration of the program. Charter serves approximately 30 percent of the schools in its footprint and provides connectivity to around 6,000 sites spread over 1,100 school districts.

It has been widely reported that the forthcoming order in the above-captioned proceeding will provide funding for schools and libraries to purchase Wi-Fi equipment or services. Charter supports eliminating the distinction between Priority 1 and Priority 2 funding in order to provide schools with the flexibility to design the most effective network for their needs. However, such flexibility could be undermined if the funding priorities were reserved. Charter supports a balanced approach that achieves the Commission's goal of providing broadband access to schools and libraries.

In our meetings, Mr. Hoehn-Saric and I also explained Charter's position that competition is the most effective way of reducing costs for schools and libraries, thereby making the most efficient use of E-rate funds. To the extent that consortium arrangements cover large areas and favor a single source provider, competition is decreased and often costs to schools are increased. Therefore, consortium buying should not be mandated or preferred, but permitted where the result facilitates a bidding process that maximizes the number of competitive bidders.

As the Commission moves to eliminate support for voice services, schools and libraries will face a difficult transition. Allowing funding for VoIP services could mitigate the impact on schools and libraries while still reducing costs to the E-rate program.

Finally, Mr. Hoehn-Saric and I also described Charter's proposals for maximizing the cost effectiveness of the E-rate program. Charter believes that a total cost analysis of all proposals is important. For example, when considering the cost-effectiveness of funding dark fiber versus purchasing an active fiber service, one must consider the costs associated with lighting the dark fiber through additional equipment purchases as well as the expense and personnel needed to maintain, monitor, and repair the network. Schools and libraries benefit from the economies of scale and technical expertise provided by Charter that they would not get from dark fiber. Moreover, given the limited E-rate resources, funding new networks or dark fiber where providers' networks already exist would be an inefficient use of government funds effectively reducing the moneys available to provide service to schools and libraries in unserved areas.

Please contact me if you have any questions regarding this filing.

Respectfully submitted,

/s/ Danielle Frappier

Danielle Frappier
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Cc: Nicholas Degani
Rebekah Goodheart
Daniel Alvarez
Priscilla Argeris
Amy Bender