

July 3, 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 counsel hereby provides notice that on July 2, 2014, Edward Marflak, Chairman of Schoolwires, Inc. ("Schoolwires"); and I of Davis Wright Tremaine, met with Amy Bender, legal advisor to Commissioner O'Rielly for wireline matters.

During our meetings we discussed the crucial role that web hosting plays in digital learning, including as a broadband-enabling service and a critical communications tool for students, educators, and parents. Mr. Marflak explained that although support for web hosting constitutes only one percent of the total E-rate budget, it provides a crucial "on-ramp" to broadband services for students, teachers, and parents by providing access to broadband-enabled digital learning services. Eliminating funding for webhosting will result in a very public reduction in digital learning resources for the nation's schools at the very time that our communities are expecting investment in the ConnectED goals. In Schoolwires' home state of Pennsylvania, for example, 425 school districts out of the total 580 districts in the state use E-rate funding to purchase webhosting services. The company's contacts at many of these districts have found it difficult to believe that the elimination of webhosting could conceptually be part of an effort to foster capacity for digital learning.

There is an option to continue funding for these crucial services *without any increase in the size of the program*. This option is to give schools and libraries the choice to use funding available under the proposed Category 2 to purchase webhosting services or Wi-Fi. Given that there will be a budget for Category 2, moving webhosting to this category will not increase the size of the program at all. If a school has an existing Wi-Fi solution that fits its needs, that school may determine that its E-rate funding could be put to better use purchasing webhosting services. The Commission should empower schools to determine their own technology needs rather than impose a one-size-fits-all solution for Category 2 funding.

Finally, we discussed that a “flash cut” of funding for webhosting would have a disastrous effect on schools and school districts throughout the country. This is particularly the case since most school districts rely on their web presence to alert parents and students of emergencies such as storms, natural disasters, and other events necessitating school closure. Transitioning budgets and/or technology arrangements for alternative funding sources and solutions will take time. The elimination of funding for webhosting by next summer would very likely affect budgets and multi-year contracts already in place. Any reduction or elimination of funding for webhosting should at least be accomplished through a phase-down similar in approach to that given to voice services.

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

Respectfully submitted,

/s/ Danielle Frappier

Danielle Frappier  
*Counsel to Schoolwires, Inc.*

Cc: Amy Bender