Macon County Schools

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Superintendents Office

July 11, 2014

The Honorable Tom Wheeler, Chairman
The Honorable Jessica Rosenworcel, Commissioner
The Honorable Mignon Clyburn, Commissioner
The Honorable Ajit Pai, Commissioner
The Honorable Michael O'Rielly, Commissioner
Federal Communications Commission
445 12th Street SW
Washington, DC 20536

Dear Chairman Wheeler and Commissioners Rosenworcel, Clyburn, Pai, and O'Rielly:

On behalf of the Macon County School (NC) system, I write to you concerning the Commission's proposal for E-Rate modernization. Since the inception of the E-Rate program, we have supported and depended upon the E-Rate program to fund connectivity and technology infrastructure to make more robust the learning opportunities for our students especially those in underserved schools.

It is therefore with a profound sense of disappointment that our system takes note of the deficiencies of the Commission's proposed changes to the program:

No increase in the funding cap – Countless numbers of schools and school districts in the country who have written or visited you have made note of the fact that the funding cap is inadequate to fund President Obama's goals for connectively that he announced at North Carolina's own Mooresville Graded School District over a year ago. The savings from the elimination of funding for "legacy" services such as voice and student email to pay for wireless connectivity not only harms our most rural and poor school districts but will be partially offset by the cost of districts increasing wide area network bandwidth. Experts have defined the cost of upgrading Wi-Fi networks in schools to exceed $10 billion. The $2 billion that the commission has "found" has largely come from not funding internal connections for the past two years and even the additional $3 billion for years three to five will be woefully inadequate to fill the need articulated by President Obama.

Lowering the discount – Lowering the discount is not a positive way to spread the available funding if it negatively impacts the most rural, poor, and neediest schools. Lowering the discount coupled with the elimination of voice, cellular, email, and web hosting (all essential services that the district must have) will mean that these reductions will be funded by reducing services elsewhere such as the elimination of

teaching assistants or rendering incapable the school's ability to pay its undiscounted share of wireless infrastructure (the exact opposite intent of the E-Rate modernization). The elimination of funding for voice (telephone service), and email service will leave Macon County Schools with an additional $65,000.00 per year funding burden, which will have to be covered with local funding.

Per student funding caps – Across the board per student caps will serve to take away funding from the very schools that E-Rate was intended to help in the first place. The per student cost of deploying technology in rural schools is vastly different than suburban schools and we strongly oppose such an approach.

Calculating discounts at the district level – Using the district wide discount to calculate eligibility for internal connections lowers the discount for the poor neediest schools and does little to simplify the program. School districts should be given the choice of using whatever method is most beneficial to them.

Demonstration projects – We are opposed to large state sponsored demonstration or consortia projects that take away the badly needed funding at the school and district level. School districts already have in place competent IT staff to manage existing technology infrastructure and creating yet another organization funded by an already oversubscribed E-Rate program is wasteful and redundant. There is little support at the school district level for such an approach.

Time is of the essence – The modernization of the E-Rate has to do done now, but we do not need changes that harm large numbers of the program's beneficiaries. We have all been a part of providing input to modernizing the program for a year now. Over a thousand comments have been filed by interested parties, but the most interested parties have to be the beneficiaries themselves – the schools and libraries that have to have the technology to serve their students and library patrons. The program is simply underfunded given the enormity of the task at hand. There is no need to put in place limited changes and then wait a year or two to finish the job. The political climate is not likely get any better and what we need is the leadership to make the hard choices necessary to make the program work for its beneficiaries. There is no greater change needed than to increase the size of the fund and to do it now.

The NCSSA adamantly calls on the Commission to increase funding for E-Rate now and not harm its current beneficiaries.

Thank you for the opportunity to address our concerns.

Sincerely,

Chris Baldwin
Superintendent Macon County Schools
Franklin, NC