



July 9, 2014

**VIA ELECTRONIC FILING**

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

**Re: Modernizing the E-Rate Program for Schools and Libraries, WC Docket No. 13-184**

Dear Ms. Dortch:

On July 7, 2014, Evan Marwell, CEO of EducationSuperHighway and Jim Kohlenberger of JK Strategies met with Commissioner Aji Pai and Nicholas Degani, Wireline Legal Advisor. In the meeting, we discussed the E-rate modernization plan proposed by Chairman Wheeler. Specifically, we discussed how the Chairman's plan would be a major step forward for America's schools and libraries by focusing the program on broadband, simplifying the application process, increasing transparency and closing the Wi-Fi gap.

We reviewed the broad bi-partisan support for the Chairman's proposed E-rate modernization plan from educators, governors, senators, congressmen, mayors, education groups and the business community. We provided the Commissioner with a copy of a letter from over 40 of America's most prominent CEOs endorsing the Chairman's plan and calling for swift action at the Commission's July 11<sup>th</sup> meeting to put the plan into action. We also provided letters from a variety state education organizations and state departments of education expressing support for the Chairman's plan, urging its approval by the Commission and noting the importance of acting on July 11<sup>th</sup> in order to ensure that America's students would not have to wait another year for more robust broadband in their classrooms.

We then discussed how the proposed E-rate modernization plan addressed the findings from EducationSuperHighway's three major pieces of analysis related to connectivity in America's schools: 1) the National School Speed Test; 2) *Connecting America's Schools: Opportunities for Action*; and 3) the LAN / Wi-Fi Cost Model developed in conjunction with CoSN. We noted that by enabling every school to upgrade its Wi-Fi infrastructure to support 1:1 learning, the proposed modernization plan would address one of the most prevalent issues resulting in 63% of schools having insufficient broadband infrastructure for digital learning. We discussed how phasing out legacy services would enable 96% of schools to afford the broadband connectivity required to meet the current digital learning standard of 100 Kbps / student of Internet access and a 1 Gbps WAN connection. We explained how providing transparency would lower the cost of broadband by arming schools and libraries with the information they needed to negotiate pricing more effectively and the accountability required to ensure that applicants and the FCC are good stewards of E-rate program funds. We explained that the proposed budget of \$150 per student for Wi-Fi was consistent with the costs of LAN / Wi-Fi upgrades identified in our model.

We also reviewed EducationSuperHighway's analysis of the amount of funding required to provide a robust Wi-Fi network for schools with less than 100 students (see attached). Our analysis suggests that schools with low student populations still had considerable Wi-Fi coverage requirements as a result of the need for 6-10 classrooms as well as common spaces such as school libraries, cafeteriums and

administrative areas. Based on this analysis, we recommended that the floor budget for Category 2 be set at \$14,000 multiplied by the applicant's discount rate as opposed to the \$6,000 proposed in the Chairman's E-rate modernization plan but noted that additional work could be done to further refine the analysis of the typical footprint of a school with less than 100 students. We also noted that our analysis likely did not apply to small libraries as they tended to have significantly smaller footprints.

We ended by urging Commissioner Pai to support the Chairman's proposed order on July 11<sup>th</sup>.

Kindly direct any questions regarding this matter to my attention.

Sincerely,

*/s/ Evan Marwell*

Evan Marwell

CEO

cc: Commissioner Pai  
Nicholas Degani