Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544

In the Matter of	**)**	
	)	
Modernizing the E-rate	**)**	**WC Docket No. 13-184**
Program for Schools and Libraries	**)**	

COMMENTS OF FILEBLIMP, LLC
in response to

NOTICE OF PROPOSED RULEMAKING: MODERNIZING THE E-RATE PROGRAM FOR SCHOOLS AND LIBRARIES

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1. Introduction

FileBlimp, a leading provider of cloud-based storage for schools, teachers, parents, and students, is pleased to offer these comments as part of the FCC's interest in modernizing the E-rate program for schools and libraries. The innovators behind FileBlimp have more than 15 years delivering solutions to educators that have revolutionized how schools, teachers, parents, and students interact to enhance learning. We see this Notice of Proposed Rulemaking (NPRM) as an opportunity to provide an additional perspective for the FCC to consider while looking at ways to modernize the E-rate program. In these comments, we will focus on the need to fund broadband infrastructure within our schools and libraries versus the need to fund education technology services such as web hosting.

2. Fund Broadband Infrastructure and Bandwidth

The need to fund improved broadband infrastructure and greater bandwidth is well defined and referenced by the FCC in the NPRM docket. FileBlimp supports the proposed shift in E-rate focus and it is aligned well with the FCC's National Broadband Plan and the Department of Education's National Education Technology Plan. In short: if teachers and students cannot connect to the Internet efficiently while at school, then the vast resources available to educators are less likely to be used.

While realigning the E-rate program to focus more on broadband connectivity is important, it is worth evaluating whether or not E-rate is the right program to fully fund broadband connectivity installation, maintenance, and recurring costs in the long term. The installation and maintenance of broadband infrastructure requires funding beyond a single fiscal year and cannot be left to the uncertainty of annual funding requests. The recurring cost of bandwidth across the broadband infrastructure is the second problem: improved infrastructure brings greater bandwidth potential, which allows users to consume more content.

The cost of both the broadband infrastructure installation and maintenance as well as the bandwidth used cannot be left to annual funding requests. In direct response to paragraph 149 of the NPRM, regarding a simplified allocation of E-rate funds, state and federal governments must look at the cost of meeting the requirements set forth in the National Broadband Plan and build those recurring and non-recurring costs into the district or school budget.

In response to paragraph 150 of the NPRM, regarding how to allocate funds for broadband connectivity, FileBlimp recommends allocating funds for broadband infrastructure (e.g. installation and maintenance of fiber) using locality-based labor and material costs. For example, it may cost $10,000 per mile to install fiber in a well-connected area such as Northern Virginia, but $30,000 per mile to install the same fiber in a mountainous community in Western Colorado. Funds for equipment and bandwidth should be allocated based on the number of users within the facility to ensure a standard bandwidth per user. For example, a standard bandwidth might be set for 1Mbps to 10 students and 1Mbps to 1 teacher/administrator. Therefore, a school with 1,000 students and 150 teachers/administrators would receive funding for the necessary equipment and bandwidth from an upstream Internet provider to meet those targets.

Shifting the focus of the E-rate program to meet the immediate requirements of school facilities is the right thing to do, but doesn't solve the long-term problem as the requirement for bandwidth continues to increase. To fully support the federal government's plan to connect school and library facilities, the state and federal governments must shift away from adhoc, annual funding requests to a budget-based model that provides funding stability.

3. Do Not Fund Education Technology Services

FileBlimp supports the removal of federal funding for services such as web hosting and e-mail in order to use those fiscal resources to enhance the broadband experience for those at school and library facilities.

The Department of Education's National Education Technology Plan outlines a greater need for teachers to be the hub of enhanced learning both in and out of the school facilities. Restricting the E-rate program to broadband connectivity helps achieve the goals set forth in the National Broadband Plan and, ultimately, the broader goals of the National Education Technology Plan. Do not continue to put "the cart before the horse" by funding web hosting while the broadband connectivity goals have yet to be achieved.

4. Conclusion

Shifting the focus of E-rate to improve broadband connectivity quickly makes sense, but a greater discussion between the state and federal governments regarding long-term funding is still required. Simplify the funding process by using locality-based cost estimates for broadband infrastructure and user-based cost estimates for bandwidth.

The value of technology in education is not simply the broadband bandwidth or "access", it is the sum of all the parts. It is the access to tools, content, and communities from school facilities, community facilities, and home. In order for education in America to extend beyond the school fences and into the homes, state and federal governments must first build a good foundation of acceptable broadband connectivity in these communities before funding other education technology services such as web hosting and email.

FileBlimp appreciates the opportunity to provide a different perspective to the FCC regarding these topics and looks forward to being part of this discussion in the future.

Respectfully Submitted,

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