

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

To: The Commission

COMMENTS OF CISCO SYSTEMS, INC.

Cisco Systems, Inc. (“Cisco”) submits these comments in response to the Commission’s *Further Notice of Proposed Rulemaking* on the future funding levels needed for the E-rate program.¹ The Commission took a vital first step toward E-rate modernization and reform in its *Report and Order* earlier this year. By updating the E-rate program to reflect the technological needs of schools and libraries in the 21st century, the Commission made meaningful progress towards the goal of connecting all classrooms across the country to high-speed wireless broadband within five years.

However, as the *FNPRM* notes, the changes adopted and the goals set for the E-rate program require careful consideration of longer-term program needs and the amount of funding available.² The Commission should adopt a long-term plan that adequately funds classroom broadband networks and technologies under the reformed E-rate program structure. At stake is the educational achievement of our young people and their ability to succeed in the classroom and in the workforce, and thus our country’s success in future years.

¹ Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184, *Further Notice of Proposed Rulemaking*, FCC 14-99 (rel. July 23, 2014) (“*FNPRM*”).

² *FNPRM*, ¶¶ 268-69.

In voting to adopt the *Report and Order* in July, Chairman Wheeler recognized the need to “assess the long-term funding of the program” to “ensure that the program remains robust for years to come.”³ Commissioner Clyburn noted that the agency’s “work is not done,” urging additional action to “ensure that all schools and libraries have affordable access to the connectivity to and within their buildings.”⁴ Commissioner Rosenworcel stated her hope that the FCC “will have the courage” to “raise the E-Rate cap” or at least address the approximately \$1 billion reduction in E-rate purchasing power stemming from the E-rate program not being indexed to inflation.⁵

The evidence is in, and the record is clear: E-rate has been underfunded for many years. Having failed to keep pace year after year, funding has stood – and remains – as a significant barrier to the achievement of the Commission’s E-rate goals. The Commission should recognize that the effort of connecting students and library patrons to high-speed Internet – and maintaining those networks efficiently as connectivity evolves over time – requires ongoing attention and sufficient funding.

³ Statement of Chairman Tom Wheeler, Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184 (July 23, 2014), https://apps.fcc.gov/edocs_public/attachmatch/DOC-328172A3.pdf.

⁴ Statement of Commissioner Mignon Clyburn, Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184 (July 23, 2014), https://apps.fcc.gov/edocs_public/attachmatch/DOC-328172A4.pdf.

⁵ Statement of Commissioner Jessica Rosenworcel, Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184 (July 23, 2014), https://apps.fcc.gov/edocs_public/attachmatch/DOC-328172A5.pdf. In the *FNPRM*, the Commission recognized the approximate “\$800-900 million reduction in the real purchasing power of E-rate funding.” *FNPRM*, ¶ 270.

Cisco has previously provided the Commission candid assessments of the costs to deploy the E-rate supported services and equipment necessary for digital connected learning.⁶ This data continues to underscore the importance of ensuring E-rate's long-term financial well-being, and that schools and libraries should have the support necessary to deploy and maintain cohesive, cost-effective end-to-end networks – however the agency chooses to reexamine available funding. Cisco urges the Commission to ensure that there is adequate E-rate funding to meet the demonstrated funding needs to meet the program's goals.

The Commission should fund E-rate in a manner consistent with these comments and Cisco's earlier comments in this proceeding.

Respectfully submitted,

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September 15, 2014

⁶ See, e.g., Cisco, "High-Speed Broadband in Every Classroom: The Promise of a Modernized E-Rate Program," attachment to Comments of Cisco Systems, Inc., WC Docket No. 13-184 (filed Sept. 13, 2013); Cisco Ex Parte (filed May 30, 2014) (providing Cisco's assessment of the internal network equipment and services that schools and libraries need to achieve the goal of modern levels of E-rate connectivity in the classroom).