



September 15, 2014

VIA ELECTRONIC FILING

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Ajit Pai
Commissioner Jessica Rosenworcel
Commissioner Michael O’Rielly
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

**Re: Comments of the Office of the Mayor of the City of Los Angeles,
*In the Matter of Modernizing the E-rate Program for Schools and
Libraries*, Further Notice of Proposed Rulemaking, WC Docket No. 13-
184 (Further Notice)**

Dear Mr. Chairman and Commissioners:

The City of Los Angeles strongly supports the Commission’s efforts to bring 21st Century broadband to libraries and schools throughout the country and welcomes the opportunity to share its experience, ideas and comments on how the E-rate program can better serve the unique needs of inner-city and urban communities in response to the above-captioned Further Notice. I am familiar with the comment letter being filed in this proceeding on behalf of the Cities of Opportunity Task Force and agree wholeheartedly with its statements about E-rate. I additionally write separately to voice my specific commitment to the endeavor on behalf of the citizens, and particularly the children, of the City of Los Angeles.

Los Angeles is committed to closing the digital divide and is fully engaged in a variety of initiatives to achieve those ends, including actively seeking out federal funding to provide critically important connectivity for the institutions that are best positioned to increase broadband access and adoption – schools and libraries. In that context, the need for a well-funded E-rate program has never been more critical.

Digital technologies are increasingly fundamental to the delivery of high quality education. A recent national survey reported that a large majority of teachers who express concern about growing disparities across schools and school districts (84%) agree to some extent with the statement that “today’s digital technologies are leading to greater disparities between affluent and disadvantaged schools and school districts.”¹ In urban centers across the country, school districts including the Los Angeles Unified School District (LAUSD) are currently embarking upon unprecedented efforts to equal the playing field for inner city youth – through comprehensive and innovative digital curriculum initiatives. A driving factor is the tremendous paradigm shift underway by education publishers who are increasingly focused on digital media as a replacement for traditional forms of educational materials. These efforts to capitalize on rich instructional content are directly reliant on having broadband infrastructure accessible in the classroom and in the home.

Our schools lack the broadband infrastructure needed to provide high quality education. If inner-city school districts do not have access to broadband they will not be positioned to provide students an equitable/fair education. A recent Pew Research Center survey of teachers reported:

Teachers of the lowest income students are the least likely to say their students have sufficient access to the digital tools they need, both in school and at home. In terms of community type, teachers in urban areas are the least likely to say their students have sufficient access to digital tools IN SCHOOL...²

In Los Angeles, further investment in upgraded, modern communications infrastructure is urgently required. Although LAUSD, the second largest school district in the country, has received a significant amount of E-rate funding since 1998,³ its identified needs

¹ Kristen Purcell, Alan Heaps, Judy Buchanan and Linda Friedrich, “How Teachers Are Using Technology at Home and in Their Classrooms,” (National Writing Project, College Board and Pew Research Center, Feb. 28, 2013). Available online at: http://www.pewinternet.org/files/old-media/Files/Reports/2013/PIP_TeachersandTechnologywithmethodology_PDF.pdf (last accessed September 13, 2014), at 4.

² *Id.* at 3-4.

³ *In the Matter of Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Comments by Los Angeles Unified School District Related to The E-Rate 2.0 Notice Of Proposed Rulemaking (filed Sept. 13, 2013), available at: <http://apps.fcc.gov/ecfs/document/view?id=7520943375> (last accessed September 13, 2014) (LAUSD Comments) at 4 (reporting having received more than \$725 million in funding since 1998). See also LAUSD’s Reply Comments (filed May 27, 2014) available at: <http://apps.fcc.gov/ecfs/document/view?id=7521151826> (last accessed September 13, 2014).

were not fully funded,⁴ and necessary upgrades in communications infrastructure are lagging. A recent Commission staff report estimated that roughly 65% of the nation's public schools have fiber facilities to the building,⁵ but less than 21% of LAUSD's schools have fiber connections,⁶ and even more basic communications infrastructure in Los Angeles schools need updating.⁷

Our libraries lack the broadband infrastructure needed to support a burgeoning community need for digital access. Los Angeles supports the American Libraries Association's comments that libraries serve as a critical link in providing children and adults with access to technology and the skills to take advantage of its benefits, and that public access computer use continues to be one of the fastest growing services in public libraries.⁸ Through the award of nearly \$7.5 million in a Broadband Technology Opportunities Program grant for public computer centers, together with local matching funds and local leadership committed to expand Angelenos' access to public computers, Los Angeles was able to expand and upgrade 188 public computer centers at libraries, workforce centers, parks, and youth and family centers in low-income and non-English-

⁴ See LAUSD Comments at 4.

⁵Wireline Competition Bureau & Office Of Strategic Planning and Policy, Staff Report, WC Docket 13-184 (Aug. 12, 2014) at 11, available online at: https://apps.fcc.gov/edocs_public/attachmatch/DA-14-1177A2.pdf (last accessed September 13, 2014).

⁶ See FCC E-rate Maps of Fiber Connectivity to Schools and Libraries, <http://www.fcc.gov/maps/E-rate-fiber-map> .

⁷ For example, a recent LAUSD report indicated that "the average age of telecommunications systems (telephone, public address, and intercommunication) at LAUSD's K-12 schools is between 13 and 15 years and these systems are experiencing increased failure rates....Failures or non-working systems and phones disrupt daily communication and may prevent critical communication during emergencies." See Los Angeles Unified School District, Board of Education Report, Amendment to the Information Technology Strategic Execution Plan to Define and Approve IT Infrastructure Projects (May 13, 2014). Available online at: <http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/91/BOE%20388%20IT%20Infrastructure%2005132014%20BOARD%20REPORT%20FINAL.pdf> (last accessed September 13, 2014).

⁸ *In the Matter of Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Comments of the American Library Association (filed Sept. 16, 2013) available at: <http://apps.fcc.gov/ecfs/document/view?id=7520944024> (last accessed Sept. 13, 2014) at 9.

speaking communities in the City.⁹ Those computer centers now see more than 100,000 users per week on average.¹⁰

However, there is considerably more work to be done to meet community demand as it is estimated that as many as 30% of all Angelenos do not have Internet access at home.¹¹

Future E-rate funding levels need to be expanded. In the Further Notice, the Commission seeks additional comment on the future funding levels needed for the E-rate program to meet its goals. As the Commission itself noted, numerous commenters have already called on the Commission to raise the E-rate funding cap, which was set in 1997, and only began to be adjusted for inflation in 2011.¹² Los Angeles shares the Commission's call for a meaningful increase in overall funding, and in particular support the request of the Cities of Opportunity Task Force to engage in an immediate dialogue with local leaders to gain their unique insights in this discussion.

The effort to provide inner-city youth with broadband access, online resources and computing devices to ready themselves to be productive citizens with competitive skillsets represents more than a worthy education priority – it should be considered one of the greatest civil rights challenges of our time.

Delivering broadband to the youth represents a tremendous economic development opportunity as these youth prepare to take their place in the 21st Century workforce. The City of Los Angeles supports the Commission's substantial efforts to modernize E-rate, and urges the Commission to ensure the program is fully funded to meet these important commitments to our children and our future.

Sincerely,



ERIC GARCETTI
Mayor

⁹ Details about the BTOP-funded Los Angeles Computer Access Network project are available online at: <http://www2.ntia.doc.gov/grantees/CityofLosAngeles> (last accessed September 13, 2014).

¹⁰ Quarterly Performance Progress Report For Public Computer Centers, Recipient Name: City of Los Angeles, Award Number: 06-42-B10009, Date: 03/29/2013. Available online at: http://www2.ntia.doc.gov/files/grantees/06-42-b10009_city_of_los_angeles_ppr2012_q4.pdf (last accessed September 13, 2014).

¹¹ www.cetfund.org.

¹² See Further Notice, ¶¶ 269 and 270. For example, LAUSD Comments at 6 (calling for a permanent increase to the funding cap to a minimum of \$5 billion per year).