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

FOCUSED COMMENTS FROM THE ALLIANCE FOR EXCELLENT EDUCATION ON ISSUES RAISED IN THE NOTICE OF PROPOSED RULEMAKING FOR MODERNIZING THE E-RATE PROGRAM FOR SCHOOLS AND LIBRARIES

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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I. Introduction

The Alliance for Excellent Education (the Alliance)[1] is pleased to submit focused comments to the Federal Communications Commission (the Commission) in response to the E-Rate Public Notice (E-Rate PN)[2] issued by the Commission on March 6, 2014 regarding the modernization of the E-rate program. Modernizing the E-rate program is a necessary and important first step in providing a world-class education system that will allow America to compete globally in the twenty-first-century economy. Connecting schools and libraries across the nation with high-speed broadband is critical to providing an equitable and effective education for all students. Therefore, the Alliance remains firmly committed to the goal of providing 99 percent of America's students with high-speed broadband within the next five years.

In response to the latest call from the Commission, the Alliance offers focused comments that advocate for meeting the goal of increased connectivity. While the Alliance recognizes that modernization of the E-rate program is an important step forward, expansion of the program through increased funding remains the most critical ingredient necessary for future success. The Alliance urges the Commission to modernize the program through a comprehensive order that would be effective in time for Funding Year 2015. It will then be necessary for the Commission to determine how much funding is needed to achieve the goal of providing 99 percent of America's students with high-speed broadband within the next five years, taking into account savings resulting from the modernization of the program.

The Alliance urges the Commission to make this determination swiftly in order to permanently expand funding for the program as necessary.

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[1] The Alliance for Excellent Education is a Washington, DC–based national policy and advocacy organization dedicated to ensuring that all students, particularly those who are traditionally underserved, graduate from high school ready for success in college, work, and citizenship.
[2] "Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization," WC Docket No. 13-184, *Public Notice*, DA 14-308, March 6, 2014 ("E-Rate PN").

II. Summary

The Alliance applauds the Commission for its commitment to provide an additional $2 billon in funds dedicated to improve access to high-speed internet service in more schools and libraries across the nation.[3] This doubling of the investment in broadband to cover 20 million students in at least 15,000 schools is a critical down-payment toward expanding the E-rate program.[4]

In his Digital Learning Day address, Commission Chairman Tom Wheeler noted that it is time for the E-rate program "to move to the next level of education."[5] The Alliance encourages the Commission to do so by focusing the $2 billion in identified funds on internal connections; providing certainty to eligible entities through multi-year funding; allowing specialized assistance to high-need applicants; reducing support for voice services; and implementing demonstration projects on a limited based in order to identify the most effective means of providing ubiquitous access to high-speed broadband.

III. Focused Funding for High-Capacity Broadband

The world has changed since E-rate was first enacted in 1996, when only 14 percent of schools were connected to the internet. Today, thanks in large part to E-rate, 94 percent of schools and libraries across the country are connected to the internet.[6] The Government Accountability Office has noted that 83 percent of public schools and 51 percent of library systems participate in the E-rate program.[7]

While the E-rate program has been very successful in helping schools get connected to the internet, the increased demand for robust content and ubiquitous computing power has made high-capacity access to broadband essential to realizing the potential for digital learning strategies. This exponential demand could not have been imagined when the program was created eighteen years ago. While the connections to schools and libraries have improved, they are not sufficient to support high-quality digital learning. According to data compiled by the Commission, half of E-rate applicants have slower internet connections than the average American home.[8]

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[3] Federal Communications Commission, "FCC to Boost Investment in Broadband for School, Libraries by $2B" (February 3, 2014), http://www.fcc.gov/document/fcc-boost-investment-broadband-schools-libraries-2b (accessed March 31, 2014).

[4] Ibid.

[5] T. Wheeler, remarks at "National Digital Learning Day," Alliance for Excellent Education event, February 5, 2014, http://www.fcc.gov/document/fcc-chairman-tom-wheelers-remarks-national-digital-learning-day (accessed March 31, 2014).

[6] J. Wells and L. Lewis, *Internet Access in U.S. Public Schools and Classrooms: 1994–2005* (NCES 2007-020) (Washington, DC: U.S. Department of Education, 2006).

[7] U.S. Government Accountability Office, *Long-Term Strategic Vision Would Help Ensure Targeting of E-Rate Funds to Highest Priority Uses* (Washington, DC: Author, 2009).

[8] Federal Communications Commission, "FCC Launches Modernization of E-Rate Program to Deliver Students and Teachers Access to High-Capacity Broadband Nationwide," fact sheet, July 19, 2013, http://www.fcc.gov/document/fact-sheet-update-e-rate-broadband-schools-and-libraries (accessed March 31, 2014).

A. Provide More Funding For Internal Connections

The Alliance supports the goal of providing focused funding for the internal connections necessary to bring high-capacity broadband to the nation's classrooms. As noted in the E-Rate PN, funds available for internal connections currently found in Priority Two have been limited to schools and libraries in the highest-discount matrix.[9] The Alliance conducted an analysis of E-rate applications and found that, in Funding Year 2012, more than 5,700 Priority Two applications were not funded. This, combined with the fact that no funding is available for internal connections in 2013,[10] demonstrates the need for additional Priority Two funding.

The Alliance strongly supports expanding the reach of E-rate by increasing the funds that are currently available for Priority Two to assist more applicants with internal connections. The E-Rate PN outlines a series of proposals that warrant strong consideration to ensure that internal connections receive some level of support each year. Over the long term, this can only be accomplished by permanently raising the E-rate cap. In the short run, the Alliance recommends focusing the $2 billion recently identified by the Commission[11] on support for internal connections.

B. Provide Certainty Through Multi-Year Funding

The Commission also seeks focused comments on providing certainty to applicants concerning funding.[12] Multi-year funding provides much-needed flexibility for school districts seeking to improve their high-capacity access to the internet. The Alliance strongly supports multi-year contracts as a mechanism to provide applicants with certainty that will allow them to more effectively plan for the implementation of quality digital learning.

C. Provide Specialized Assistance to High-Need Applicants

E-rate has been effective in large part because it is a public-private partnership. Even at the highest discount rate, E-rate requires some contribution from the eligible entity. This local contribution helps ensure that applicants have a stake in making sure that expenditures are cost effective.

The E-Rate PN posits the possibility of providing full support for some entities that could not otherwise afford high-capacity broadband.[13] Because it is critical for all students to have access to high-speed broadband, the Alliance concurs that for a limited number of eligible entities able to demonstrate severe need, E-rate should provide a 100-percent discount. The Commission should design a process to ensure this opportunity is limited to entities that

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[9] E-Rate PN, ¶ 9.
[10] Trent Harkrader, "From the Wall to the Desk: Facilitating 21st Century Digital Learning," *Official FCC Blog* February 20, 2014, http://www.fcc.gov/blog/wall-desk-facilitating-21st-century-digital-learning (accessed March 31, 2014).
[11] E-Rate PN, ¶ 7.
[12] E-Rate PN, ¶ 22.
[13] E-Rate PN, ¶ 28.

would not otherwise be able to provide their students with access to effective digital learning opportunities.

D. Focus Technology Planning on Broadband Deployment

It is critical for districts and schools to have a comprehensive plan for using technology effectively to enhance student learning, prior to making technology purchases. Therefore, the Alliance developed "Project 24," an initiative to help school districts plan for and effectively use technology and digital learning to achieve the goal of college and career readiness for all students.[14] As a condition for receiving E-rate support, the Alliance recommends maintaining the requirement for a technology plan, and further recommends narrowing the plan's focus on how E-rate funds will be used to effectively deploy broadband within the school or library.[15] Should the Commission be interested in providing guidance on this issue, information provided by the Alliance is available at: http://plan4progress.org/gears/technology/.

E. Provide Transparency Through Easily Accessible Data

Making the E-rate program more transparent to the public is an important part of modernization. Data can demonstrate how funds are being awarded and spent, and the demonstrated need of all applicants. Transparent and easy access to this critical data is imperative to maintain public support.

Available data should include how much each eligible entity has requested, what has been allocated to it, and how funds have been expended. To provide a user-friendly way for citizens to monitor their schools and libraries that are receiving E-rate funds, the Commission should develop a public website that tracks the funds being given to every applicant and how the funds are being used. The website should allow for ways to generate reports and search for meaningful data related to E-rate. Further, the Alliance supports transitioning the current E-rate paper application to one that is fully online to allow for a more streamlined and simple process.[16]

IV. Reduced Support for Voice Services

Since the inception of the E-rate program, the need for voice services has decreased in importance as new technology such as "voice over IP" has emerged. The Alliance supports the phasing out of voice service through a gradual shift in funding over time, in a manner to be selected by the Commission, which gives current applicants time and flexibility to adjust to the change. However, the Alliance supports the continuance of some funding for voice services for certain applicants that have a demonstrated severe need. As noted in the Alliance's original NPRM comment filing,[17] these applicants would include rural schools and libraries serving high percentages of low-income students and tribal communities.

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[14] Alliance for Excellent Education, "Project 24," http://all4ed.org/issues/project-24/ (accessed March 31, 2014).
[15] E-Rate PN, ¶ 36.
[16] E-Rate PN, ¶ 37.
[17] See "Comments from the Alliance for Excellent Education," WC Docket No. 13-184, (filed September 16, 2013).

V. Demonstration Projects

The Alliance does not encourage the use of a substantial amount of E-rate funds on demonstration projects because the base program itself is underfunded. If the Commission decides to undertake demonstration projects, the Alliance urges that such projects be limited to those that will identify ways for E-rate to support ubiquitous access for students in highest need.

For example, if a limited number of pilot projects are offered, the Commission should explore partnerships between schools, libraries, and community-based organizations to offer expanded access to students outside of school.[18] The partnerships should enable students to take advantage of anytime, anywhere learning opportunities made available by digital learning. These community organizations could receive E-rate discounts to assist them—in partnership with schools and libraries—in delivering educational opportunities to students.

Moreover, the Commission could explore ways to use wireless hotspots for communities in order to ensure students have access to high-speed broadband for educational purposes when they are not in school. Such access is critical for students to complete routine homework assignments, take advantage of extra support needed to master core content, and complete complex projects that are a part of a college- and career-ready education.

VI. Conclusion

The Alliance appreciates the opportunity to comment on the future of the E-rate program. Progress is already being made in modernizing E-rate as demonstrated by the Commission's recent announcement to allot $2 billon in dedicated funds to provide high-capacity broadband to schools across the nation. But more must be done in the coming months to ensure the E-rate program helps improve student learning and prepare the nation's students for college and a career in all districts, regardless of income disparities. The Alliance is committed to supporting the Commission's efforts to provide at least 99 percent of America's students with high-speed broadband within the next five years. Through the "99 in 5" campaign,[19] the Alliance will continue to advocate for an E-rate program that is simplified, modernized, and expanded.

The Alliance applauds the Commission's robust effort to modernize E-rate and increase the efficiency and effectiveness of the program. In order to achieve the goal of providing at least 99 percent of students with high-speed broadband within the next five years, the Alliance believes a permanent increase in E-rate funding will be necessary. The modernization of E-rate currently being contemplated by the Commission lays the foundation necessary for the permanent expansion of the program. The Alliance looks forward to working with the Commission to see the E-rate modernization and expansion process through to its completion so that all students will have access to the digital learning opportunities necessary for success in the twenty-first century.

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[18] Ibid.

[19] Alliance for Excellent Education, "99 in 5: Broadband in Schools" www.99in5.org (accessed March 31, 2014).