

June 12, 2014

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel,  
Commissioner Pai, and Commissioner O'Reilly:

We, the undersigned organizations and individuals, represent education organizations, technology advocates, businesses, foundations, civil rights organizations, community broadband organizations, libraries, and school districts. Together, we constitute a broad array of stakeholders who share the goal of upgrading the E-rate program so our nation's schools and libraries will have sufficient bandwidth to use robust digital learning strategies to improve student outcomes and increase digital opportunities for everyone. Many of us have filed comments in the Federal Communications Commission (FCC) proceeding and have expressed different points of view and ideas as to how the FCC should proceed.

The purpose of this filing is not to express what each of us separately believes is the best possible plan. Rather, it is to provide the FCC with a recommendation from a diverse group of parties, many enmeshed and knowledgeable about the details of the program, for a framework and set of actions to achieve our common goal of updating the E-rate program to bring today's schools and libraries into the digital age.

The internet is the textbook of the twenty-first century, without which the nation's students cannot excel academically today or compete economically in the future. It is also the manual for the twenty-first-century workforce, which is fundamental to ensuring the nation stays globally competitive. Therefore, we all agree that the FCC must modernize, expand, simplify, and strengthen the successful E-rate program to connect at least 99 percent of America's students to high-speed internet within five years by advancing high-capacity broadband to every school and library, including internal connections within every classroom and library building. As described below, we also all agree this can be done with a framework that upgrades program goals and funding levels; focuses expenditures on broadband for current and future needs; enables more efficient purchasing; and simplifies the application process.

Many of us are in businesses and organizations that have used these modern communication tools to improve efficiency and productivity to incent innovation. These tools support powerful forms of information exchange, enabling individuals and groups to readily access data and resources and collaborate with others. These same tools, now critical to our professional lives, also have the power to enable students to achieve their maximum potential. They help personalize learning and allow each student access to the specific knowledge and skills they need to support their growth and achievement. These tools enable teachers to more effectively serve their students' needs and engage parents.

They also are essential to completing education, jumpstarting employment and entrepreneurship, and empowering millions through our nation's public libraries.

Failing to provide educators, students, and those individuals outside the formal education system with fast and ready access to the internet will put our country at risk in the global economy. The internet has altered the very nature of work and the skills individuals need to be competitive. If a business does not embrace technology and the internet, that business is unlikely to succeed. Likewise, if our schools and libraries do not embrace technology and the internet, our children and our workforce will be ill-prepared to sustain America's global economic leadership. America cannot afford to stand by while our competitors around the world invest in the future by supporting a superior education and workforce development system.

To move forward, the FCC must update the structure of the E-rate program to assure that funds are efficiently spent on the technology that can best serve education and lifelong learning purposes today and into the future. Most of us believe that substantially increased funding will be necessary to achieve the 99 in 5 goal and note that the program has effectively been shortchanged by not having any CPI increase for the first fourteen years of the program, as is routine for other government programs.

We collectively suggest that the FCC employ the following framework for a fair and workable way of beginning to upgrade the program.

### **Suggested Framework for FCC Discussions Regarding the Modernization and Simplification of the E-Rate Program**

- 1. Upgrade the E-rate program.** The initial goal of the E-rate program, to connect every school and library, is no longer sufficient to address the needs of our students and leverage the potential for today's digital learning. Capacity per user (student, educator, administrator, library user) is the key. We recommend that the FCC establish new capacity goals to meet the long-term needs of schools, districts, libraries, and library systems.

*Consistent with this objective, we recommend the FCC:*

- Establish minimum broadband infrastructure goal for every school and library as a benchmark for determining the program's progress toward the goal, while ensuring school districts and consortia retain the flexibility to acquire the broadband solutions that meet the unique needs of their students. These goals should include
  - high-speed broadband connectivity to the school district and library system;
  - high-capacity bandwidth to each school and library within a district or system;
  - local area connectivity to every classroom and throughout libraries; and
  - internal connectivity, including Wi-Fi, throughout all learning spaces.

- Base the goal on the specific need within each school or library, using SETDA’s suggested level of 100 mbps per thousand students by 2015 and 1GB target by the 2017–18 school year.
- Commit to reviewing these goals every four years.
- Revise the data collection requirement about current broadband capacity in schools and libraries to ensure all stakeholders have the information they need to make informed decisions to improve performance.
- Allow the FCC and the public real time access to this data to track the progress towards meeting these goals. This step should include investing in Universal Service Administrative Company’s (USAC’s) capacity—technology and human resources—to manage and share information.

**2. Focus expenditures on providing broadband to classrooms and libraries to meet capacity needs today and into the future.** To ensure that every student and adult has an equal opportunity to learn and be prepared to participate in the knowledge economy, we must connect our schools and libraries to high-capacity broadband and deploy ubiquitous wireless networks throughout the school and library so that the needs of today’s and tomorrow’s learners can be met.

*Consistent with this objective, we recommend the FCC:*

- Encourage investment in scalable, high-capacity, high-quality/reliable, cost-effective, long-lasting broadband networks, prioritizing broadband connectivity plus associated equipment/services which enable broadband utilization over non-broadband related services.
- Expedite applications that will utilize funds for scalable, high-capacity broadband connectivity.
- Ensure sufficient funding for internal connections to spread bandwidth to all schools and libraries.
- Maintain the program’s focus on equity by prioritizing support for schools and libraries serving the greatest concentrations of students from low income families.
- Ensure that major structural changes to the program are implemented through a transparent process, over time.

**3. Incent schools and libraries to purchase bandwidth more efficiently.** In this era of limited resources the FCC should structure the program to help schools and libraries lower the cost of high-speed bandwidth; indeed, as Chairman Wheeler has noted, the FCC has a responsibility to ensure that “schools and libraries are receiving connectivity at an affordable education rate.”

*Consistent with this objective, we recommend the FCC:*

- Facilitate multi-year applications for recurring services.

- Encourage consortia applications, such as by prioritizing the processing of consortium-based applications ahead of other applications in the review process, as consortia applications are most likely to get the most services at the lowest cost.
  - Encourage bulk purchasing of commodity services and equipment to take advantage of volume discounts.
  - Make full use of the power of transparency to reduce costs, increase accountability and reduce waste, fraud and abuse in the program.
    - i. Revise USAC reporting requirements and procedures to ensure that information, including pricing information, is readily available to the FCC, applicants, and the public.
    - ii. Adopt an open data policy that makes all data collected as part of the E-rate program available to the public.
    - iii. Invest in a cost-effective online reporting system to achieve the goals of simplification and transparency.
  - Maximize the options available to schools and libraries that leverage private sector initiatives in order to ensure applicants receive the most bandwidth for the lowest cost. This approach also captures the efficiencies generating demand among anchor institutions to incentivize the build out of network capacity that can result in serving all locations in an area. As the FCC has noted, “it is more economical to build a network that serves a wide range of users in the community.”
  - Ensure technological neutrality of high-capacity network options that meet the scalable, cost-effective, high-speed targets, as discussed above.
  - Adopt rules that give schools and libraries the option of purchasing broadband connectivity, network equipment and service contracts from federal, state agencies and other regional and national consortia and replace E-rate program procurement rules with those of the applicable state or locality.
  - Encourage shared use of network infrastructure among schools, libraries and other anchor institutions to reduce costs and eliminate silos. The rules should maintain flexibility for public institutions seeking to support community connectivity needs to meet the educational goals of the program.
- 4. Simplify the process for schools and libraries to apply for funds.** The record makes clear that while the E-rate application process has improved, it places unnecessary burdens on applicants, especially in small, rural districts where manpower to fill out paperwork is scarce.

*Consistent with this objective, we recommend the FCC:*

- Develop applicant online portals, such as that described by SECA, which will permit application tracking and make it easier for applicants to apply.

- Eliminate paper filing of required forms and information.
- Modify the procurement rules to allow vendors to provide technical advice on network design to applicants. This is in addition to vendor-neutral technical assistance and capacity building efforts in states and districts.
- Review multi-year contracts only once per contract (up to five years) provided applicants certify that no substantial changes have been made to the contract each year and contracts are consistent with broadband targets established for the program.
- Invest in USAC's ability to more quickly approve applications and execute other process and functions that create unnecessary delays in the system.

The overarching goal to support the FCC's efforts to modernize, simplify and expand E-rate to connect schools and libraries to broadband for instructional purposes is essential to America's prosperity. We believe the framework described above can help guide the FCC's efforts to modernize and simplify the program. The framework is also consistent with the views expressed in the bi-partisan correspondence from Congress ([letter 1](#); [letter 2](#)), [the United States Conference of Mayors](#), [the National Association of Counties](#), and a group of [50 CEOs of major American companies](#). These reforms lay the foundation for the permanent increase in the program's funding that we believe will be necessary to connect at least 99 percent of the nation's students to high-capacity broadband within the next five years. Of course, we acknowledge that the funding increase must be guided by fiscal discipline and the knowledge that average consumers are responsible for funding this vital national policy.

Thank you for your consideration. We look forward to continuing our work together to bring America's classrooms and libraries into the digital age.

Sincerely,

Access Humboldt  
Albemarle County Public Schools  
Alliance for Excellent Education  
Baldwin County Public Schools  
Baltimore County Public Schools  
Benton Foundation  
Berea City School District  
Blue Valley Unified School District #229  
Calistoga Joint Unified School District  
Charlottesville City Public Schools  
Cisco Systems, Inc.  
City of San Leandro  
Cleveland Early College High School  
Cleveland School of Science and Medicine  
Common Sense Media  
Connected Nation, Inc.

Council of Chief State School Officers  
Coventry Local Schools  
Deming Public Schools  
Democrats for Education Reform  
Digital Learning Now!  
Digital Promise  
Education Superhighway  
Elizabeth Forward School District  
Enlarged City School District of Middletown  
Friday Institute for Educational Innovation, NC State University College of Education  
Fulton County Schools  
Grants-Cibola County Schools  
Highline Public Schools  
Horry County Schools  
Houston Independent School District  
Howard-Suamico School District  
Howell Mountain Elementary School District  
Indian Prairie School District  
International Association for K–12 Online Learning  
Iowa City Community School District  
Kent School District  
Knox County Schools  
Leading Education by Advancing Digital (LEAD) Commission  
League of United Latin American Citizens  
Lexington County School District One  
Lincoln Public Schools  
McAllen Independent School District  
Mentor Public Schools  
Meridian Joint School District No.2  
Merit Network, Inc.  
Microelectronics Center of North Carolina  
Minority Media and Telecommunications Council  
 Mooresville Graded School District  
Napa County Office of Education  
Napa Valley Unified School District  
NapaLearns  
National Association of State Boards of Education  
National Association of State Directors of Special Education  
National Board for Professional Teaching Standards  
National Commission on Teaching and America's Future  
National Council for Geographic Education  
National Council of Teachers of English  
National Council on Learning Disabilities  
National Network of State Teachers of the Year  
National Writing Project  
New America Foundation's Open Technology Institute and Education Policy Program

New Media Consortium  
New York State Education and Research Network  
North Central Ohio Computer Cooperative  
OneCommunity  
Onslow County Public Schools  
Orange City Schools  
OSHEAN, Inc.  
Parents for Public Schools  
Pascack Valley Regional High School District  
Paul Cuffee School  
Piedmont City School District  
Pope Valley Elementary School District  
Public Knowledge  
Raleigh County Schools  
Reynoldsburg City Schools  
Rhode Island Library Information Network for Kids  
Richland School District Two  
Riverside Unified School District  
Roanoke County Public Schools  
Rock Hill Public Schools  
Rowan Salisbury Schools  
San Jose Unified School District  
Schools, Health & Libraries Broadband  
Schoolwires, Inc.  
Sheridan AllPrep Academy  
Smarter Balanced Assessment Consortium  
South Fayette Township School District  
Southeast Asia Resource Action Center  
St. Anthony Indian School  
St. Helena Unified School District  
State Educational Technology Directors Association  
Sunnyside Unified School District  
The Chicago Community Trust  
The Enterprise Center  
The Intergenerational Schools  
The Nord Family Foundation  
The Rainbow PUSH Coalition  
United States Distance Learning Association  
Utica Community Schools  
Vancouver Public Schools  
Waggener Edstrom Worldwide  
Webster County Schools  
West Virginia Network  
Worldwide Workshop  
York County School Division  
Young Adult Library Services Association

