

May 27, 2014

Chairman Thomas Wheeler
Federal Communications Commission
445 12th St SW,
Washington, DC 20536

Dear Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai and O'Rielly:

We, the undersigned organizations representing the approximately 14,000 public school districts, 100,000 public schools, 31,000 private schools and 16,415 public libraries that are the beneficiaries of the E-Rate program, write to express our continued support for efforts to strengthen and modernize the E-Rate program. We have coordinated on this letter and focus our comments on two key concepts: the need for adequate, sustained funding for the E-Rate program; and the critical nature of ensuring equitable access to support for internal connections for all applicants.

Funding: We cannot wait any longer to increase E-Rate support. The time is now to permanently raise the E-Rate's annual funding cap. The facts about E-Rate funding are not in dispute: annual demand is routinely twice the current cap, now set at approximately \$2.41 billion; demand for telecommunications and Internet access services (Priority I services) has now eclipsed the current cap, leaving no funds for internal connections requests (Priority II services); and the program has received no meaningful funding increase since 1998. If the Commission is serious about ensuring that all schools and libraries have sufficient high-capacity bandwidth - to make use of the digital tools, content, services and assessments - we cannot wait until some indeterminate future date for additional E-Rate support. The Commission must take up the funding question in its first order on E-Rate.

Internal Connections: It is not good enough to ensure that high-capacity broadband reaches school and library doors; adequate bandwidth must reach every building and classroom and every student, educator and library patron. Otherwise, the promise that broadband can provide our students and library patrons will be lost. The absence of any E-Rate support for internal connections in 2013, and likely deep into the future, is creating major roadblocks to students, educators and library patrons having enough bandwidth to perform online research, participate in digital professional learning classes, and apply online for jobs or government services and benefits. The Commission should devote the vast majority of the \$2 billion in funds it has identified in E-Rate's coffers to meeting school and library internal connections needs.

Any restructuring of the current Priority II distribution mechanism cannot abandon a cornerstone of the E-Rate program: equity, using poverty as the metric. The E-Rate program's biggest success has been in technologically raising up low-income schools and libraries, allowing their students, educators and library patrons to receive Internet access on a par with their wealthier peers. In our view, any formula based on per student, per classroom, per building or per district allocations, would hit hard the rural and geographically low population areas that E-Rate was designed to support.

The FCC should avoid experimenting with unproven, arbitrary formulas that would most likely harm rural areas. Rather, in its effort to ensure Priority II dollars reach a greater portion of applicants, the FCC should consider some of the structural changes our group has already endorsed, including lowering the discount matrix by a modest amount and restricting the ability to apply for support to once in five years. We think that this combination of changes preserves the program's focus on poverty and will equitably spread internal connections to help support more applicants, including rural schools and libraries. We do not support fundamentally changing the existing structure of the E-Rate Program by abandoning the

equitable distribution of funds for internal connections and believe any such changes would come at the detriment of E-Rate beneficiaries.

We appreciate the Commission's efforts to modernize the program but urge the Commission to fashion an E-Rate order that addresses the need for more funds immediately along with measured structural changes.

Sincerely,

AASA: The School Superintendents Association
American Federation of Teachers
American Library Association
Association of Education Service Agencies
Consortium for School Networking
International Society for Technology in Education
Learning First Alliance
National Association of Elementary School Principals
National Association of Federally Impacted Schools
National Association of Independent Schools
National Association of Secondary School Principals
National Catholic Educational Association
National Education Association
National Rural Education Association
National Rural Education Advocacy Coalition
National School Boards Association
Organizations Concerned with Rural Education
Rural School and Community Trust
United States Conference of Catholic Bishops