



CCSESA

California County Superintendents Educational Services Association

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July 7, 2014

Mr. Tom Wheeler, Chairman

Federal Communications Commission

445 12th Street SW

Washington, D.C. 20554

Dear Mr. Chairman,

I am writing on behalf of the California County Superintendents Educational Services Association (CCSESA), a statewide association representing all California county superintendents, to express our continued support for investment in, and modernization of, the E-Rate program. The importance of technology to educational improvement cannot be overstated. Broadband and wifi provide access to valuable digital learning tools such as interactive textbooks, advanced online classes, and individualized instruction plans. Furthermore, achieving complete connectivity in the classroom is essential to ensuring that California's students acquire the digital literacy skills they need to compete in the 21st century. While CCSESA supports the Commission's plan to increase funding and implement programmatic changes, we have the following concerns with the current proposal:

The proposal significantly over-estimates savings from phase-out of voice and ancillary services. Information from the Universal Service Administrative Company (USAC) indicates that funding requests for voice and ancillary services (i.e. web-hosting, email, and paging) made up less than 10% of California's total E-Rate requests in 2014. Assuming the national request rate follows suit, a 10% reduction in E-Rate requests due to phase-out of voice and ancillary services would result in an annual savings of \$225 million. Based on the Commission's current 20% per year phase-out proposal, total E-Rate savings over 5 years would equal only about \$675 million; nowhere near the additional \$3 billion needed to implement the Commission's \$5 billion proposal. While CCSESA strongly supports the Commission's goal of 99% connectivity within 5 years, we urge the Commission to identify a concrete and sufficient funding source, which is equal to the actual estimated cost of implementation, that will enable us to accomplish this shared goal.

The proposal fails to account for increased Priority 1 costs due to new Priority 2 investments. In 2013, eligible Priority 1 funding requests alone exceeded the total E-Rate cap. While CCSESA supports the Commission's proposed investment in new Priority 2 infrastructure, new infrastructure will only further increase demand for Priority 1 funding. If current Priority 1 requests already exceed the total cap, how will the Commission accommodate new Priority 1 requests from recipients of new Priority 2 infrastructure investments? Ultimately, investments in new Priority 2 infrastructure are moot if applicants do not also receive Priority 1 funding to supplement monthly connectivity costs. To ensure sustainability, CCSESA recommends that any increase in new Priority 2 funding be accompanied by an increase in the E-Rate cap.



The plan proposes a distribution structure that will negatively impact rural and low-income schools. According to information collected by the K-12 High Speed Network, more than 2,000 California schools, districts, and charter schools do not have access to basic broadband (i.e. 10Mbps) services. The cause of under-connectivity is simple: the cost of service and infrastructure has shut the poorest and most rural schools out of the broadband market. If the Commission's goal is to achieve connectivity for ALL students, it cannot ignore or disregard the heightened expense and additional investment necessary to bring basic broadband access to poor and rural schools. CCSESA applauds the Commission's goal of 99% connectivity and urges the Commission not to adopt a distribution structure that would prioritize uniformity over actual need.

The goal of connecting schools and students to broadband and wireless services is an urgent priority. CCSESA supports your efforts to increase funding and streamline the E-Rate program. We urge you to address the concerns raised in this letter so that adequate funding exists to match the Commission's commitment and critical services are not denied to students because of the communities in which they live. Please contact us if we can provide additional information on these important issues.

Sincerely,

Peter Birdsall
Executive Director