



December 4, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket No. 13-184:
Ex Parte Communication**

Dear Ms. Dortch:

On December 2, 2013, Genevieve Morelli and Micah Caldwell of the Independent Telephone & Telecommunications Alliance (“ITTA”), Mike Saperstein of Frontier Communications, and Shelly Eggert of CenturyLink (by phone) met with Lisa Hone, Trent Harkrader, Dania Ayoubi, Chas Eberle, Mark Walker, and James Bachtell of the Wireline Competition Bureau and Jonathan Chambers of the Office of Strategic Planning and Policy Analysis regarding the Commission’s efforts to modernize the E-rate program to facilitate access to high-capacity broadband connections for schools and libraries.¹

During the meeting, ITTA emphasized its support for the E-rate program, which has been instrumental in ensuring that schools and libraries have access to modern communications networks that enable students, teachers, parents, and members of the community to take advantage of the educational and economic opportunities available in the digital age.² Due in large part to the program, ITTA member companies currently offer speeds of 100 Mbps, and in some cases 1 Gbps, to hundreds of schools and libraries throughout the nation, many of which are located in rural areas where access to modern technology is needed most. Modern communications networks allow ITTA members and other providers to provide a whole suite of services that further the educational purposes of the E-rate program, including web hosting, electronic mail services, interactive content, distance learning applications, and other cutting-edge learning tools.

¹ *In the Matter of Modernizing the E-rate Program for Schools and Libraries*, Notice of Proposed Rulemaking, WC Docket No. 13-184, FCC 13-100 (rel. July 23, 2013).

² *See* Comments of the Independent Telephone & Telecommunications Alliance, WC Docket No. 13-184 (filed Sept. 16, 2013).

ITTA believes that the success of the E-rate program renders an extensive overhaul of the program unnecessary. The Commission should build upon this success by adopting proposals that would reduce administrative burdens and maximize the cost effectiveness of the program while avoiding changes that would undermine these goals.

Accordingly, ITTA supports Commission proposals that would streamline and improve the program's administration, such as speeding up the review of applications and issuance of commitment decisions, increasing the transparency of the application process, moving to electronic filing of required forms and correspondence, and allowing E-rate applicants to receive disbursements directly from USAC rather than going through their E-rate service provider.

At the same time, the Commission should refrain from adopting changes that would undermine its stated goals. For instance, there is no need for the Commission to increase E-rate certification, audit, document retention, and disclosure requirements. Doing so would create unnecessary administrative burdens for ITTA members and other longstanding E-rate participants when existing requirements are sufficient to guard against waste, fraud, and abuse in the E-rate program.

The Commission also should refrain from adopting proposals would expand the E-rate budget without furthering the educational purposes of the E-rate program – *e.g.*, by extending E-rate support to wireless community hotspots. The Commission cannot increase funding for the E-rate program if it would jeopardize other important Commission policy goals relating to broadband deployment and adoption. Increasing broadband speeds and access to cutting-edge educational tools for schools and libraries is a laudable goal, but it should not come at the expense of other important initiatives, including those that provide more general support for broadband deployment, such as the Connect America Fund. To the extent any changes the Commission adopts threaten the financial integrity of other universal service programs, the Commission must answer calls by ITTA and others to address long overdue reform of the universal service contribution mechanism, which could result in a greater amount of funding being made available for all worthy programs.

ITTA also encouraged the Commission, as it considers ways to modernize the E-rate program, not to undermine the existing program on which schools and libraries have come to rely by discontinuing support for voice services or limiting support to voice service that is bundled with broadband. While it makes sense to phase out E-rate support for services for which there is no demand, schools and libraries will continue to rely on “plain old telephone service” (“POTS”) for the foreseeable future as the industry transitions to an all-IP world. Given that this transition is occurring naturally in response to marketplace forces, the Commission should not interfere. Should the Commission nevertheless determine to phase out support for POTS, it must ensure a reasonable time period for such a transition.

Marlene H. Dortch
December 4, 2013
Page 3

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing a copy of this letter in the appropriate docket.³

Respectfully submitted,



Micah M. Caldwell
Vice President, Regulatory Affairs

cc: Lisa Hone Mark Walker
Trent Harkrader James Bachtell
Dania Ayoubi Jonathan Chambers
Chas Eberle

³ 47 C.F.R. § 1.1206(b).