

FCC Consumer Advisory Committee Recommendation Regarding Improving the E-rate Program

We recommend that the FCC improve and modernize the E-rate program for the 21st Century. We make this recommendation in light of the Chairman's recent statements regarding the need to improve the E-rate program and its requests for comment on the subject, as well as the overall goal of the administration to improve access to broadband internet for our nation's students and communities.

We recommend the FCC include the following priorities in its efforts to improve the E-rate program and promote more efficient use of E-rate funds:

General priorities

1. Broadband connectivity for schools and libraries should be a priority. Demand for much higher speeds has increased rapidly over the last several years and will continue to grow. Schools and communities must be provided with a framework that empowers a range of options to invest in broadband.
2. E-rate funding should be distributed in a way that promotes fair and equitable service and adequate speeds to schools and libraries of various sizes and in various locations.
3. The E-rate program must ensure that schools and libraries are not only connected to the internet, but also assist in the purchase of essential equipment to spread that connectivity throughout the schools and libraries and beyond.
4. The FCC should consider whether Priority 2 funding adequately addresses the unique needs of rural communities and smaller schools, as well as the changing educational environment, where learning does not stop at the end of the school day or when the student leaves the campus.
5. Do not tie funding to specific educational outcomes. Funding based on educational outcomes has the potential to further the digital divide and deepen the gap in the effectiveness of our schools.

Process-oriented priorities

6. Data collection and monitoring of the E-rate program should be improved. This process starts with simpler, better designed E-rate application forms. Better data can help improve the efficiency of allocation of E-rate funds, identify needs, and promote greater transparency about the services and network speeds in schools and libraries.

7. Implement an electronic filing system. An electronic filing system would both streamline and centralize the application process by making all forms electronically accessible and automating what is an otherwise tedious process.
8. Simplify the application and disbursement processes for E-rate applicants and customers. For instance, the FCC could create a Form 471EZ to save time in the application process as well as the reviewing process; and consider eliminating the Form 470 requirement altogether.
9. Enhance predictability of funding. The filing window dates have shifted each year since the program's inception. There should be a set permanent and stable annual filing date for applications. Then, schools can knowingly set aside the resources, manpower, and time necessary to file the applications in an orderly fashion, while limiting filing deadline waiver requests.
10. Allow multi-year applications, such as three-year Form 471 applications. By allowing applicants to plan more than one year in advance, they will be able to pursue long-term networking plans based on stable, predictable funding. This would increase the utilization rate and should cut back on waste and hasty, short-term solutions.

E-rate requests in 2012 and 2013 greatly exceeded the \$2.25 billion cap, doing so by nearly double in 2013. In addition to making reforms to the program to ensure E-rate funds are spent effectively, the FCC should closely monitor and determine the appropriate level of funding to the E-rate program necessary to bring schools and libraries into the 21st century and remain internationally competitive in an evolving educational environment.

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Respectfully submitted:

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FCC Consumer Advisory Committee