



Dec. 5, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St, SW
Washington, D.C. 20554

Re: Notice of *Ex Parte* presentation in WC Docket No. 13-184

Dear Ms. Dortch:

On Monday, Dec. 2, several Members of the SHLB Coalition (John Windhausen, SHLB Coalition Executive Director; Katherine Messier (Mobile Beacon); Denise Atkinson-Shorey (CoSN); Larra Clark (ALA); Dan Bertuna (ICF); and Sarah Morris (New America Foundation)) met with Lisa Hone, Michael Steffen, Cara Voth, Dania Ayoubi, James Bachtell, Charles Eberle, Mark Walker, Soumitra Das, Mark Nadel, and David Strickland of the FCC staff to discuss the SHLB Coalition's views on E-rate reform. The SHLB Coalition expressed the following views:

1. The FCC should use the opportunity provided by this E-rate reform proceeding to carry out Goal #4 of the National Broadband Plan to ensure that all schools and libraries have 1 Gbps broadband capacity by 2020.
2. Additional funding should be made available for the E-rate program.
3. The recent CoSN survey demonstrates that both the ongoing, monthly recurring costs and the upfront deployment/capital costs make it difficult for schools and libraries to obtain the broadband capacity that they need. The reformed E-rate program should address both these financial barriers.
4. To address the capital investment barrier, the FCC should make new additional funding available within the E-rate program (in addition to continuing support for monthly recurring costs) for a Temporary E-rate Connect Fund (similar to the Healthcare Connect Fund) to pay for broadband deployment capital costs. Annual funding should be provided for a short period of time (3-4 years) and deployment thereafter until all schools/libraries have "future-proof" capacity available and affordable. The SHLB Coalition is investigating how much funding will be necessary to reach this goal.

5. The TECF should be technology neutral, including both fiber and wireless services. The current rules discriminate against dark fiber and this discrimination should be eliminated so that schools and libraries have the option of owning and managing their own network, as some do today.
6. The FCC should also treat “managed wireless (WiFi) services” as equivalent to wireless “hot spot” services and cellular data services so that schools and libraries have the option to allow a third party to manage their in-building wireless services for them.
7. E-rate should allow, but not pay for, extensions of their broadband service from the school or library to the community. E-rate has limited funds, and should not be used to fund service outside the school or library directly. E-rate should also not be a barrier to hot spots or white spaces. If a school or library wishes to enable these services to its surrounding neighborhoods, E-rate cost allocation rules should permit them to do so easily and clearly.
8. The FCC should step up its enforcement of the lowest corresponding price rule through regular audits and through more transparency in E-rate prices. The FCC should also clarify the “similarly situated” language so that it is possible to compare schools and libraries’ prices with others in similar circumstances.

If there are any questions about this filing, I can be reached at (202) 256-9616.

Sincerely,



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Executive Director

SHLB Coalition

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cc: Michael Steffen
Lisa Hone
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