June 30, 2014

Ex Parte **Notice**

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

RE: WC Docket No. 13-184, Modernizing the E-rate Program for Schools and Libraries

Dear Ms. Dortch:

On Friday, June 27, 2014, the undersigned, on behalf of NTCA–The Rural Broadband Association ("NTCA"), together with Brian Ford of NTCA, met with Jonathan Chambers, Chief of the Office of Strategic Planning and Policy Analysis, Michael Steffen and Nicholas Alexander of the Office of Strategic Planning and Policy Analysis, Patrick Halley, Wireline Competition Bureau Associate Bureau Chief, and Sean Conway from the Wireline Competition Bureau. The parties discussed the Universal Service Schools and Libraries Program ("E-Rate").

First, NTCA presented the results of a recent survey (attached), in which members reported their progress in providing high-quality broadband service to the schools and libraries in their service areas.

- Of the 724 K-12 schools identified by NTCA members as located within their serving areas, (74.7%) of those are already connected by Fiber-to-the-Premises ("FTTP"), and another (4.6%) are connected by Fiber-to-the-Node ("FTTN").

- Of those connected schools, NTCA members reported offering maximum speeds of 435 Mbps (mean) and 100 Mbps (median).

In particular, the results confirm that rural rate-of-return-regulated local exchange carriers ("RLECs") and the statewide networks they own and operate have already made tremendous progress in delivering high-capacity broadband connections, via fiber, to the schools and libraries they serve.

Second, NTCA representatives stated that member companies have made a determined effort to provide these schools and libraries with the robust internal connections, including Wi-Fi

technology, necessary to deliver broadband service to each individual classroom and student. However, adequate funding for this critical input remains insufficient, and NTCA is pleased with the Commission's focus on funding these vital services going forward.

Next, NTCA expressed concern that any impending reforms to the E-rate program do not inadvertently limit the support available to small, rural schools and libraries. Schools and libraries in rural areas already face significant barriers to affordable access to broadband, as affordability is almost always an overarching concern in high-cost, sparsely-populated rural areas where a combination of higher operating expenses and more significant middle mile costs to cover vast distances complicate the delivery of services.

Finally, NTCA stated that its membership survey data once again underscores the necessity of modernizing the E-rate program though a carefully coordinated and targeted approach, as the laudable vision of connecting schools and libraries is already being realized or evolving toward success, and that RLECs in the vast majority of cases have sufficient capacity in place to meet today's (and tomorrow's foreseeable) demands. Resources that might otherwise be used to "overbuild" existing broadband infrastructure could instead make the price of broadband more affordable for schools or libraries or serve the narrower purpose of deploying or upgrading facilities in areas that truly do suffer from a lack of any access to a broadband-capable network.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,
/s/ *Michael R. Romano*
Michael R. Romano
Senior Vice President – Policy

cc: Jonathan Chambers
       Michael Steffen
       Patrick Halley
       Nicholas Alexander
       Sean Conway

NTCA SCHOOLS AND LIBRARIES SURVEY UPDATE
June 2014
124 responses

K-12 Schools

Average # of K-12 Schools in ILEC Service Area:
- 6.6 mean; 3.3 median

Types of Connections to K-12 Schools
- FTTP: 74.7%
- FTTN: 4.6%
- Copper: 16.6%
- Fixed Wireless: 0.3%
- None: 3.9%

Average Maximum Speed Available:
- 435 Mbps mean; 100 Mbps median

Average Speed Purchased:
- 65 Mbps mean; 40 Mbps median

Average Maximum Speed Requested for Price Quote:
- 219 Mbps mean; 95 Mbps median

Did that K-12 School Buy Maximum Speed Requested for Price Quote or a Lower Speed?
- 62% purchased that speed
- 27% purchased a lower speed
- 11% did not purchase from ILEC

Libraries

Average # of Libraries in ILEC Service Area:
- 2.6 mean; 1 median

Types of Connections to Libraries
- FTTP: 46.9%
- FTTN: 13.3%
- Copper: 37.6%
- Fixed Wireless: 0%
- None: 2.2%

Average Maximum Speed Available:
- 296 Mbps mean; 75 Mbps median

Average Speed Purchased:
- 16.7 Mbps mean; 10 Mbps median

Average Maximum Speed Requested for Price Quote:
- 45 Mbps mean; 10 Mbps median

Did that Public Library Buy Maximum Speed Requested for Price Quote or a Lower Speed?
- 74% purchased that speed
- 15% purchased a lower speed
- 11% did not purchase from ILEC