July 7, 2014

***Ex Parte* Letter**

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:

This correspondence is provided as a follow-up to a meeting held on Friday, June 27, 2014 in which the undersigned and Brian Ford, on behalf of NTCA–The Rural Broadband Association ("NTCA"), discussed the Universal Service Schools and Libraries Program ("E-Rate") 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.

In that meeting, NTCA presented the results of a recent survey in which members reported their progress in providing high-quality broadband service to the schools and libraries in their service areas. FCC staff present in the meeting posed several questions as to the survey results provided, and NTCA provides further information in response to those inquiries.

As to the survey respondents, the 124 rate-of-return-regulated rural local exchange carriers ("RLECs") that responded to the survey provide service in 151 study areas over 34 states.

With respect to RLECs' success in serving libraries in their service areas, anecdotal evidence following discussions with a number of NTCA members suggests that the discrepancy between the percentage of schools served with fiber versus libraries served with fiber found in the survey results can likely be attributed to the relative size differential between the two categories of Community Anchor Institutions ("CAIs"). Specifically, NTCA members report that the libraries in their service areas are typically very small, often having only a handful of computers and thus having lesser bandwidth needs as a group than schools. These lesser bandwidth needs can be more easily accommodated using existing copper facilities (particularly where libraries may often be more proximate to central offices), and thus, the imperative to extend fiber to library premises to satisfy demand to date has not been as strong as that for schools. Moreover, NTCA members also report, again anecdotally, that state initiatives to promote and fund broadband connections to CAIs have not typically been as focused on libraries.

Having said that, NTCA's members remain committed to providing the highest quality broadband connections possible to each and every possible user – whether residential dwelling, enterprise, school, or library – to ensure access to all of the applications and services that a high-speed broadband connection can make possible. NTCA members have worked to deploy fiber deeper into their networks over time and closer to customer premises as demand and local school and library budgets dictate. The speed availability and adoption numbers provided in the NTCA survey also indicate that NTCA members – and RLECs generally – have done a commendable job of "staying ahead of the curve" with respect to anticipated bandwidth demands, with existing E-Rate resources helping schools and libraries to adopt (and keep adopting) services over time.

NTCA has long been supportive of the ConnectEd initiative and has offered a number of suggestions for how to modernize the E-rate program (*See*, Comments of NTCA, WC Docket No. 13-184, filed Sept. 16, 2013; Comments of NTCA, WC Docket No. 13-184, filed Apr. 7, 2014). NTCA has recommended, among other things, an analytical framework to ensure that E-rate funds can be used efficiently and effectively so that as many schools and libraries as possible can have affordable *and, just as importantly, sustainable* access to high-capacity broadband service. By using such an approach, resources that might otherwise be used to "overbuild" existing broadband infrastructure (whether internal or external) could instead make the price of broadband more affordable for more schools or libraries, 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, or be used to upgrade the internal connections (such as Wi-Fi) necessary to bring a broadband connection directly to the device of every student and library patron.

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