



Miami-Dade County Public Schools

giving our students the world

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23

COMMENTS OF MIAMI-DADE COUNTY PUBLIC SCHOOLS

Miami-Dade County Public Schools (M-DCPS), the fourth largest school district in the country, is pleased to respond to the Commission’s Further Notice of Proposed Rulemaking (FNPRM) on the subject of “Advancing Broadband Availability Through Digital Literacy Training.”

M-DCPS is managed totally independent of metropolitan and city governments. It is guided by a nine-member School Board, and responsibility for its administration is vested in the district’s Superintendent. M-DCPS supports the educational needs of approximately 350,000 students in an urban environment made up of a varied ethnic composition. At last count, approximately nine percent are White Non-Hispanic; 25% are Black Non-Hispanic; and 65% are Hispanic. Economically, the district is somewhat disadvantaged, based on their participation in the National Schools Lunch Program (NSLP). It is currently at a district-wide aggregate average of 83 percent. Proudly, one of our many recent accomplishments include, leading the Country in Advanced Placement (AP) test scores among Hispanic students, according to national College Board Reports.

Thus, M-DCPS enthusiastically applauds the interest the Commission has shown to ensure that the benefits of broadband services are made available to all. In fact, it is encouraging to note that the Commission is putting its best efforts forward in support of Broadband services at large. In response to this FNPRM, however, M-DCPS cannot support the initiative set forth by the Commission to include Digital Literacy Training as an eligible component of the E-Rate program, and thus dedicate much-needed but much-limited federal funds available through this Program.

Digital Literacy is commonly understood as the ability to locate, organize, understand, evaluate, and analyze information using digital technology. It involves a working knowledge of current high-technology, and an understanding of how it can be used. Further, digital literacy involves a consciousness of the technological forces that affect culture and human behavior. ¹ It can also be understood as “the ability to understand and use information in multiple formats from a wide range of sources when it is presented via computers.” ² In fact, **Digital Literacy** encompasses all digital devices, such as computer hardware, software (particularly those used most frequently by businesses), the Internet, and cell phones.

M-DCPS has long recognized the need to assist parents, the community at-large, and of course, staff and educators alike, by providing technical and Digital Literacy Training. M-DCPS did not wait for State or Federal funds to arrive, but instead, engaged in community support and courted donors (see, <http://theparentacademy.dadeschools.net/sponsors.htm>), as well as expanding our grant filing opportunities. The outcome of these combined efforts has resulted in our own Digital Literacy Training programs available free of charge to all. Proudly, M-DCPS has never expected or relied upon such federal programs as the Universal Service Administrative Corporation (USAC), and E-Rate funds to provide this service to our community. Simultaneously, however, M-DCPS does strongly recognize the importance and impact that the E-Rate program has had in providing, and supporting, the technological infrastructure necessary to deliver excellence in education at M-DCPS.

As an example, and to this end, Miami-Dade County Public Schools (M-DCPS) implemented, among other internal training initiatives, a Digital Literacy Training program known as “The Parent Academy.” This project was primarily directed at supporting parents become computer savvy individuals, able to support the educational requirements and needs of our students, their children, and eventually break the divide and also feel and become “Digital Citizens.” This district initiative can be accessed directly at <http://theparentacademy.dadeschools.net/index.htm> at our own district’s website.

As well, M-DCPS has further expanded its outreach efforts to provide Digital Literacy Training through its online Technology Learning Center (TLC) at the Information Technology Services (ITS) department. You may access this organization at <http://tlc.dadeschools.net> and its offerings particularly at <http://tlc.dadeschools.net/anytimeLearning/index.asp>

It is painfully evident that school districts nationally, and particularly M-DCPS, find themselves in need of continually updating their curriculum for Digital Literacy to keep up with accelerating technological advancements. To do so, such efforts require far more tangible equipment needs such as computers in the classroom, the use of educational software to teach curriculum and, particularly, course materials made available to students online. In fact, the inclusion and interaction made possible through ‘smartboards’ and audience response system is an educational breakthrough of magnitude proportions.

Yet, unfortunately, the Federal Communications Commission (FCC), respectfully noted, has not addressed any of the costs associated with the above tools needed to bring Digital Literacy Training to fruition, through the E-Rate federal program. Instead, the Commission broadly recommends in this proposal that this already-drained program bear the cost of Digital Literacy Training.

The proposed FNPRM includes such unique – and fundamentally ineligible components – as the opportunity to fund, using federal E-Rate dollars, to cover Labor Costs for trainers; Marketing staffing; costs to recruit volunteers; and Administrative costs to support Digital Literacy Training in general. Respectfully, the Commission should first engage in serious consideration for the bigger picture – that of substantially increasing available funds to the E-Rate program before further consideration is given to fund additional initiatives – considering how, for the most part, the E-Rate program runs out of funds at the early stages of funding requests for Priority 2 applications in general. Regretfully then, M-DCPS, therefore, cannot support this initiative.

Perhaps we should relate to Digital Literacy Training in a different way, much like understanding technology as if it were a language, no different than English, Spanish, or French. Marc Prensky coined the terms “digital native” and “digital immigrant” to relate to the difference between being born into the digital age – thus a “digital native” – and one who is forced to adopt technology later in life – thus a “digital immigrant” who inevitable retains a certain “accent” – and thus restricts them from communicating as freely as “digital natives.”³

The importance of this distinction is vividly translated into the classroom of today – where most educators are “digital immigrants” (based on the Prensky notion), and might resist teaching digital literacy because they themselves were not taught that way...If we understand and agree with the Prensky idea noted above, then using the E-Rate federal funds would constitute no less than tapping this funding source to teach any other subject. The next idea could then be: Why not use E-Rate funds to support ESL Training...?

This position and opinion should not constitute a misread and a perception that M-DCPS is not in favor of promoting Digital Literacy. It does not, however, advocate the use of limited funds, clearly intended for other purposes, and as a consequence further drain these limited resources.

At a time when Districts are still weathering economic uncertainty – and still find ourselves working with limited resources to meet and achieve our internal goals, we support alternative means and methods to pursue on an individual-district basis / or perhaps other governmental agencies can step in and provide the much needed support. In the meantime, M-DCPS respectfully notes and suggests that the need to pursue available grants, and seek community support and sponsors/donors – while a bit more cumbersome and requiring unique efforts – may be the only alternative at this time, and one we should all learn to espouse and master.

References:

1. Gurak, Laura (2001). *Cyberliteracy*. New Haven: Yale University Press.
2. Gilster, Paul (1997). *Digital Literacy*, New York: Wiley & Computer Publishing. Page 1.
3. Prensky, Marc. “Digital Natives, Digital Immigrants.” *On the Horizon*. MCB University Press. Retrieved 30 November 2011.

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Further, M-DCPS is respectfully expanding its response to the FNPRM by addressing some of the specific “requests for comments.”

Response to Item 419 (page 195 of the FNPRM) – “LAUNCHING A NATIONAL DIGITAL LITERACY CORPS TO TRAIN YOUNG PEOPLE AND ADULTS TO TEACH DIGITAL LITERACY SKILLS...” While this is an honorable initiative, M-DCPS respectfully suggests instead that we rely on school districts to carry this banner program and instead of spending E-Rate funds in this initiative, that BTOP grants be allocated instead to the notion of “One Laptop per Child” before the BTOP funds end in 2013, as noted.

Response to Item 421 (page 196 of the FNPRM) –. “USING UNIVERSAL SERVICE SUPPORT [SPECIFICALLY] TO PROVIDE DIGITAL LITERACY FUNDING, INCLUDING WHETHER SUCH FUNDING SHOULD BE USED FOR DIGITAL LITERACY TRAINING PROGRAMS...” M-DCPS does not support this initiative.

Response to Item 426 (page 198 of the FNPRM) – “SEEK COMMENT ON WHETHER UNIVERSAL SERVICE FUNDING FOR DIGITAL LITERACY SHOULD BE FOCUSED ON TRAINING PROGRAMS.”

M-DCPS has implemented “The Parent Academy” uniquely and specifically to support the Digital Literacy Training of parents, the community, district staff, and others. This has been successfully achieved thru community support and donations. These training programs have been very successful, and a myriad of comments are available at the district’s website for The Parent Academy: <http://theparentacademy.dadeschools.net/index.htm>. Thus, it is not the intent of M-DCPS to argue that such training programs are indeed useful or not. They are. It is, instead, the associated costs of implementation and support through the use of E-Rate funds that is arguable. Thus, M-DCPS does not support the use of E-Rate funds to support Digital Literacy Training.

Response to Item 429 (page 200 of the FNPRM) – SEEK COMMENT ON THE ISSUE OF AVAILABILITY OF “OPERATING HOURS” TO SUPPORT DIGITAL LITERACY TRAINING...

This is a clear example of an issue/concern that can better be resolved by simply allowing school broadband to expand into the school community legally by making this service E-Rate eligible beyond the classroom walls. Students and parents would be best served by accessing an already E-Rate eligible resource, at minimal, if any, additional expense to the program and the school district.

Response to Item 430 (page 201 of the FNPRM) –

a). “PROPOSE TO LIMIT FUNDS TO ENTITIES THAT DO NOT ALREADY OFFER FORMAL DIGITAL LITERACY TRAINING SERVICES...”

Response to Item 430 (page 201 of the FNPRM) –

a). Continued

M-DCPS respectfully, but strongly opposes the limiting of E-Rate eligible funds to communities [districts] that already provide digital literacy training, and to make it available to those who do not have these resources in place. While M-DCPS strongly feels that no federal E-Rate funds should be made available at all to support Digital Literacy Training, this measure can be viewed as an apparent penalty to be levied on those districts in the avant-garde of technology that have made serious strides, often at our own cost to provide such services to their communities.

Response to Item 430 (page 201 of the FNPRM) –

b). “PROPOSE THAT ANY DIGITAL LITERACY TRAINING SUPPORTED IN SCHOOLS BELIMITED TO THOSE SCHOOLS THAT OFFER COMMUNITY ACCESS AFTER REGULAR SCHOOL HOURS.”

M-DCPS, again respectfully but strongly, opposes the idea of community access to schools after hours, in exchange for E-Rate funding support. This initiative poses safety risks and supplementary costs to hire additional staffing at a time when cutbacks are more the norm than the exception. Instead, as noted in our comment on Section 429, simply allow for existing broadband/bandwidth availability to “bleed” eligibly into the community at-large. Such targeted approach could be achieved, as noted in Section 254 of this FNPRM that “gives the Commission authority to designate additional services eligible for support through E-Rate. {See 47 U.S.C. ss 254(c)(1), (c)(3), (h)(2)(A)}.

Response to Item 436 (page 203 of the FNPRM) – “SEEK COMMENT AS TO WHETHER ANY OF THE FOLLOWING SPECIFIC SERVICES TO ADVANCE DIGITAL LITERACY SHOULD BE ADDED TO THE [E-RATE] ELIGIBLE SERVICES LIST (ESL)...”

- Labor costs for trainers (dedicated to provide digital literacy training.
- Staff training for trainers, including costs for in person training, conferences...”
- Curriculum development associated costs...
- Software and materials to facilitate digital literacy training.
- Marketing: staff time to market the training classes...
- Volunteer recruitment: staff time spent on recruiting...
- Administrative costs: staff time administering the program...

M-DCPS respectfully opposes all Bullet Items noted in this section, with the exception only of allowing the costs associated with “Software and materials to facilitate in-person digital literacy training.”

Response to Item 444 (page 205 of the FNPRM) – “SEEK COMMENT ON WHETHER [THE FCC] ESTABLISH A SEPARATE FILING WINDOW FOR DIGITAL LITERACY TRAINING APPLICATIONS.”

M-DCPS firmly believes that under no circumstances, regardless of the initiative in question, should there ever be separate filing windows for the E-Rate program. The chaotic results could

be enormous to both the SLD and the applicants by having to keep up with different funding windows, depending on the service being requested.