

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON DC 20554

In the matter of)
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Comments on the 2014)
Eligible Services List)
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Schools and Libraries Universal Service) CC Docket No. 02-06
Support Mechanism)

My name is Jeff Patterson and I am the Founder and CEO of Gaggle.Net, Inc. We have been a provider in good standing under the Universal Service Support Mechanism for Schools and Libraries (the "E-rate program") since 2002. We appreciate the opportunity to participate in the E-rate program, and we know that our school partners appreciate the opportunity to defray through the E-Rate some of the costs of our high quality and cost-effective products. Thus, we are extremely concerned by the Draft Eligible Services List for 2014, which would place a significant limitation on school purchases of our collaboration tools under the web hosting category. We urge the Commission to delete the proposed limitations in this category and to allow schools to purchase collaboration tools from Gaggle and other vendors who do not offer web hosting. Alternatively, we recommend transferring collaboration tools from the web hosting to the e-mail services category as we believe, for a number of reasons, they are better situated there.

I founded Gaggle in 1999 to ensure that students could safely and securely communicate and collaborate over E-Rate supported networks. Gaggle provides secure e-mail services and collaboration tools. Our collaboration tools (or interactive communication tools) such as student blogs, student websites and homework lockers allow teachers and students to work together, promoting expanded educational opportunities. In some instances, the presence of these tools allow for a level of involvement in educational activities not achieved through traditional media. These tools allow for real-time assessments of student learning, provide more immediate

feedback to drive professional development, and enable the creation of interactive online lessons that empower teachers to understand each student's strengths and weaknesses and design lessons and activities that better meet their needs. These are some of the stated goals of ConnectEd, as articulated by President Obama.

Let me share two of the many school district testimonials that we have collected, both of which underscore how Gaggle's tools have helped school districts meet their educational goals:

- An instructional specialist at Charlotte-Mecklenberg Schools in North Carolina stated: "This year, the brand new Gaggle app will be used in iPad classrooms throughout the district. Students will be sharing devices, so having the ability to log in and out of mail is a necessity. Student-created photo slide shows and movies can be uploaded easily from the camera roll and synced to the students' digital lockers for easy viewing at home or on any school computer. One of my favorite features of the Gaggle app is "Mark it up," which allows teachers to review, grade and return assignments to students, saving paper and time in the process. Any district involved in an iPad rollout should definitely look to Gaggle for their email, storage and workflow solutions. We are happy we did!"
- The Instructional Technology Coordinator at Northbrook School District 27 in Illinois said: "Gaggle is extremely customer service oriented. We use Gaggle extensively in our Reading and LA classes for reading responses and novel studies as a tool for students to communicate with their teacher both inside and outside of the school day. Students submit responses weekly, answer quiz questions, and use the Message Board for group discussions. Knowing that our students' documents are filtered by Gaggle provides a safety net that allows our students anytime, anywhere access to their assignments."

We believe that the proposed limitations would make it economically infeasible for many school districts to choose Gaggle's collaboration tools merely because they are

not packaged with a web hosting service. Not only is this distinction arbitrary, we submit that it imposes unfair restrictions on competition (one of the stated goals of the 1996 Telecommunications Act). It seems inappropriate to allow those entities hosting district websites to be the only vendors who can provide the robust communication tools that make the whole area of web hosting so important to the education community. Generally, the vendors who do the actual website hosting are *not* providing high quality communication tools. Often products offered by companies doing the hosting of the district website are not CIPA compliant, meaning that the school will have to engage in other activities (and incur increased costs) to ensure that regulatory requirements are met. Thus this limitation would artificially constrain districts and prevent them from achieving their educational goals and ensuring student safety online.

Additionally, the restriction on web hosting to one provider is not consistent with how other services are obtained. Under the current ESL, school districts can pursue their educational goals by obtaining phone service (for example) from multiple providers. The Commission has a long standing record of not placing itself in the shoes of districts in determining the most appropriate educational solution. In terms of web hosting, this proposed limitation would have exactly that effect. It puts the Commission in the role of deciding how the district should receive communication tools, relegating districts to an often inferior product as the only solution.

We urge the Commission also to consider making collaboration tools eligible for discount under the e-mail services category of the ESL. Indeed, we have long believed that collaboration tools, as interactive communication services, are more analogous to e-mail than to web hosting. Collaboration tools like blogging and homework lockers offer more than opportunities for students to broadcast information; they allow for real time interaction between students and among students, teachers and parents. Via these tools, students comment on each other's work and teachers can suggest edits and additional resources. When email was first available, it was used mostly as a "broadcast" medium, allowing the sender to share information. Very quickly email

developed as an interactive tool, allowing for the rapid exchange of information (directly or through attachments). As users became more sophisticated, email became more of a collaboration tool (interactive) rather than just a one-way information flow. Email is now a vital communication tool, essential for the business as well as educational needs of a district. If collaboration tools cannot be eligible as a standalone service under web hosting, we suggest that they be made available under email, either as a standalone service or from the same provider as the email service.

In sum, it is Gaggle's position that to ensure full implementation of collaboration tools, they should be eligible from *any* provider, ensuring the best product(s) at the lowest costs. We hope that the Commission will review this issue carefully and make the best decision for our nation's schools and libraries.