

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)
Support Mechanism) CC Docket No. 02-06

Thank you in advance for taking the time to read through this memo. My name is Jeremy Friedman, and I am Founder and CEO of Schoology, Inc. We have been in the business of providing collaborative and learning technology to schools since 2008, and a provider in good standing under the Universal Service Support Mechanism for Schools and Libraries (the "E-rate program") since 2011. After reviewing the Draft Eligible Services List for 2014, we are extremely concerned about the new restrictions that would be placed upon schools to make purchases under the web hosting category. In this memo, I hope to shed some light on our view, and see if there are mutually agreeable ways to proceed that put both the E-rate program and the schools and libraries best interests forward.

We set out in 2008 on a simple journey to help teachers teach better and to help improve student outcomes by providing a learning platform that fosters blended learning and virtual learning initiatives with rich collaboration, communication, and learning tools. Today we span millions of users, in every state in the United States, and nearly every country in the world. We provide safe and secure messaging, blogs, student and teacher pages & portfolios, homework dropboxes, digital resource libraries, access to a large professional learning network, and more. Through Schoology, we're helping increase the potential level of engagement and involvement more than could ever be received through existing channels. We're able to pinpoint student strength and weakness, and help teachers and students design content and curriculum to best suit their specific needs.

If this sounds familiar, it's because this is in direct support of President Obama's ConnectEd initiative. I quote the following: "We are living in a digital age, and to help our students get ahead, we must make sure they have access to cutting-edge technology...So today, I'm issuing a new challenge for America – one that families, businesses, school districts and the federal government can rally around together – to connect virtually every student in America's classrooms to high-speed broadband internet within five years, and equip them with the tools to make the most of it."

Both Schoology and many of our United States partner schools and districts appreciate the opportunity to be a part of the E-rate program. For those who have been eligible for E-rate based reimbursement, the ability to offset some of the costs for our products has in some cases meant the difference between being able to successfully implement online and blended programs – part of the very reason the FCC is looking to provide available internet access to all in the first place.

I would argue that both the proposed eligibility changes, as well as the potential to remove the email services category in the NPRM, runs counter to the fundamental goal that President Obama has set forth for the program as a whole, and that the FCC is ruling on in the near future. Furthermore, the limitations would make it an economic barrier to choose Schoology's communication and collaboration tools simply because they are not packaged with a web hosting service. From a strict implementation standpoint, web hosting alone is almost digitally primitive - there is nothing cutting-edge about. Additionally, forcing schools to choose collaboration features from web hosting providers, as an add-on is arbitrary and limiting. It forces districts into clunky technology systems and integrations not built for the 21st Century Learner.

With respect to a competitive environment, the proposed changes would create unfair restrictions on competition, which was one of the stated goals of the 1996 Telecommunications Act. Stating that district's web hosting companies are the sole vendors who can provide robust communication tools to the education community is incorrect, unfair, and dangerous to the entire education technology landscape.

Given that web hosting technologies are digitally primitive and that product specialization is what helps companies succeed, the mere fact that we are relying on web hosting vendors, who are focused on web sites and web hosting, to provide rich interactive experiences outside of their core competency results in vendor solutions that are not providing high quality communication tools at all. In fact, many do not even meet compliance regulations, meaning that there is now an additional burden placed upon schools and districts to meet compliance requirements. Following this logic, this means that the limitation actually would make it challenging for schools and districts to achieve their educational goals and to promote online and web safety, thus invalidating a major component of E-rate.

In addition to the aforementioned items, we see the restriction on utilizing a single provider as inconsistent with how other services are currently obtained and detrimental to school and district academic health. The rationale behind this is that it effectively means that the Commission is deciding how the district should receive communication tools, not allowing schools and districts to make the best choices across the best vendors to create the best possible academic

solutions. The only end result from this is inferior solutions resulting in poorer academic results.

We recognize that there is no easy solution to this problem. Our recommendation would be to eliminate the proposed requirements that would prevent schools from purchasing collaboration and communication tools from a provider other than a web hosting provider; and more specifically, to allow schools to purchase collaboration and communication tools from Schoology and other vendors that do not offer plain vanilla web hosting. Creating a new category for synchronous and asynchronous communication might also be helpful in combating the issue. Otherwise, allowing them to fall into the email category and keeping email as an eligible service, would also make sense.

If we examine the scope of email in our academic society, it used to be the sole communication resource. A student who had trouble could email his/her teacher. A student requiring assistance could communicate via email with his/her peers. Parents, teachers, faculty, and any other academic participant could always communicate through email to help extend the face-to-face presence with respect to furthering the education of our nation's students. For many teachers, email was even a way to collect student homework, and manage peer review. However, as the use cases have evolved, more specialized systems such as Schoology, allow all of the synchronous and asynchronous communication to take place more efficiently. Blogs, assignment pages, discussion boards, and safe messaging all exist in a safe, secure and specialized environment instead of residing in disparate and disorganized email services. If you examine this pattern closely, one could argue that the support of these communication tools is debatably more important than email in itself. For this reason, if a decision is made that 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.

Overall, we would once again like to thank you for the time and consideration given to this memo. Our goal is to help you create a successful program that allows collaboration and communication tools to be properly implemented by any vendor at the lowest possible cost. While only a single component of the E-rate program, it is another type of glue in the education technology fabric that is helping to push education forward. I am confident that the Commission will continue to examine the effects of the current proposed limitations, and will work to make the best decision for all of our schools and libraries.