



March 18, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, DC 20554

**Comments in WC Docket No. 19-2, E-rate Program Amortization Requirement,  
and WC Docket No. 13-184, Modernizing the E-rate Program for Schools and Libraries**

Dear Secretary Dortch,

The Schools, Health & Libraries Broadband (SHLB) Coalition files this brief comment in the above-captioned proceeding to support the comments already filed in this docket by the State E-rate Coordinators' Alliance (SECA). The SHLB Coalition joins SECA in supporting the Federal Communications Commission's proposal to eliminate the amortization requirement governing the deployment of high-capacity broadband to schools and libraries, including special construction. Requiring service providers to recover their costs over several years could discourage broadband providers from submitting bids for E-rate services, which would reduce competition and undermine the goal of promoting greater broadband deployment, especially in rural markets. If the Commission were to re-institute the amortization requirement, it could jeopardize several state matching programs that were created specifically to address the shortage of broadband investment in their states. The SHLB Coalition has previously commended the Commission for waiving the amortization rule for FY 2019 applications and continues to believe that the amortization rule should be eliminated altogether.

Sincerely,

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