

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Modernizing the E-Rate Program for Schools) WC Docket No. 13-184
and Libraries)
)
)

REPLY COMMENTS OF EDUCATIONSUPERHIGHWAY

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November 15, 2019

REPLY COMMENTS OF EDUCATIONSUPERHIGHWAY

EducationSuperHighway respectfully submits these reply comments in response to the Notice of Proposed Rulemaking in the above referenced proceeding.¹

CLARIFICATION OF INITIAL COMMENTS

EducationSuperHighway submitted initial comments on the NPRM on October 31, 2019.² In those comments, we recommended that the first option on the revised Form 470 Category 1 drop-down menu should be “Internet Service (With or Without Transport),” which would be “fully technology neutral, including Leased Lit Fiber and non-fiber options.” We also noted that, when selecting this option, applicants should be allowed to provide a preference for a fiber optic based solution. A key piece of information missing from this original argument is the percent of applicants that are currently receiving internet or WAN services via fiber transport: 99% of public schools nationwide are on scalable internet connections, with the vast majority of schools connected to the internet via fiber.³ Thus, applicants currently on fiber connections should be able to add a preference for fiber proposals within the Form 470. In terms of how applicants will denote this preference, we envision a secondary drop-down, similar to current drop-down mechanics in the Category 2 section of the Form 470.

ADDITIONAL COMMENTS

We wish to commend the State E-rate Coordinators’ Association (SECA) for their very thorough and thoughtful comments on the NPRM.⁴ We particularly appreciate the addition of the

¹ FCC 19-58, Notice of Proposed Rulemaking, DA 19-986, Released 10/1/2019

² EducationSuperHighway, “*Comments of EducationSuperHighway*,” submitted 10/31/2019

³ EducationSuperHighway, “*State of the States Report 2019*,”
<https://stateofthestates.educationsuperhighway.org/#national>

⁴ State E-rate Coordinators’ Association, “*Initial Comments of the State E-rate Coordinators’ Alliance Regarding Improvements to the FCC Form 470 Drop-Down Menu In Response to Public Notice DA 19-196*,” submitted 10/31/2019

word “Estimated” on the description of all fields involving specific bandwidth speeds in the Step 4 section of the Appendices.⁵

CONCLUSION

EducationSuperHighway applauds the intent of this NPRM to simplify the 470 filing process for applicants and appreciates the opportunity to comment on this Proceeding.

Respectfully submitted,

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⁵ *Ibid*, pp 17-18