Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of Promoting Fair and Open Competitive Bidding in the E-rate Program	)	WC Docket No. 21-455

REPLY COMMENTS OF FUNDS FOR LEARNING AND 359 OTHERS

Funds For Learning ("FFL"), along with 359 others, submits these Reply Comments in opposition to the Federal Communications Commission ("FCC" or "Commission") Notice of Proposed Rulemaking "Promoting Fair and Open Competitive Bidding in the E-rate Program." We agree with the State E-rate Coordinators' Alliance (SECA) -- and essentially the *entire* education community -- that this proposed rulemaking should not proceed.

The attached letter, and the additional individual comments which are included, clearly states that this rulemaking should not be implemented and that the Commission should focus on (1) updating the existing E-rate eligible services list, and (2) instructing USAC to improve the EPC online application portal.

Respectfully submitted,

By: /s/ John D. Harrington

John D. Harrington
Chief Executive Officer
Funds For Learning
2575 Kelley Pointe Parkway, Suite 200
Edmond, OK 73013

May 27, 2022

Dear Chairwoman Rosenworcel and Commissioners Carr, Starks and Simington:

We urge the Commission not to implement the proposed E-rate bidding portal. The FCC's proposal would negatively impact our ability to participate in the E-rate program. We believe that procurement decisions are best made at the local level, not by the Universal Service Administrative Company.

The E-rate funding program is vital to our organization's internet connectivity goals, and we depend on it to provide faster, more affordable connections to the community we serve. We strongly support the current E-rate competitive bidding system, including the requirements that applicants:

- Comply with their state and local competitive bidding rules
- Notify potential bidders of opportunities via posting of the FCC Form 470
- Publish vendor selection and pricing information via submission of the FCC Form 471
- Maintain competitive bidding documents for a ten-year period

The E-rate competitive bidding regulations do not need to be changed. The current regulations serve individual applicants, and the overall program, very well.

Rather than federalizing the procurement of E-rate eligible goods and services, the public would be better served if the Commission would focus its efforts on the following two areas: (1) updating the existing E-rate eligible services list, and (2) instructing USAC to improve the EPC online application portal.

Thank you for providing the E-rate program. It is a valuable resource for our community.

Sincerely,

/Signatures Attached/

First Name	Last Name	Email Address	Additional Comments	State
Aaron	Lewis	alewis@bwsd.org		Mississippi
Aaron	Moore	moore_aaron@hsdr3.org	We should keep the current E-rate bidding rules.	Missouri
Albert	Velarde	avelarde@cellularoneaz.com		New Jersey
Alex	Birk	alexmbirk@gmail.com	Having worked intimately with E-Rate the past 3 years, having the ability to field, manage, and monitor bids without intermediary interference has significantly helped to curate the quality and relevancy of received bids. I believe changing this and adding a mandatory intermediary would only serve to elongate and increase the difficulty of an already long and difficult procurement process.	New Jersey
Alex	Menard	amenard@npsdnj.org		New Jersey
Alton	Archibald	alton.archibald@grmustangs.org		Nebraska
Amanda	Jones	ajones5@pps.net		Oregon
Amy	Ard	amy.ard@tangischools.org		Louisiana
Amy	Denman	adenman@madison.k12.ga.us		Georgia
Andi	Hudson	andilhudson@gmail.com		Oklahoma
Andre	Soileau	ars@p65.org	Staying local is best for schools and local and small Service Providers. Bringing this to nationwide federal level with only enrich the largest players which I'm confident is the goal of this.	Washington
Andy	Klaber	wklaber@miamisburg.k12.oh.us	We benefit greatly from the way E-rate is currently structured. Please do not make these proposed changes that would limit our ability to choose what's best for our school district.	Ohio
Anne	Fischer	afischer@metrolibrary.org	I highly disagree with federal control of the rate bidding process for Internet. This is a huge step backwards for recipients of erase funds. You would be better served to work at updating eligible services as you are very behind the times in this area and what is needed by schools and libraries. I’m very disappointed in this plan!	California
Ann-Marie	Miller	annmiller@fortinet.com		California
Anthony	Barno	abarno@echs.org		California
Anthony	Terceira	tony.terceira@gmail.com	As a 22year + Consultant withDistrict. I find that those states that have State Master Contract are a key part of helping districts insure cometitive bids Since all vendors on State Master contracts must submit bids to the state and the state awards cotact status to those which meet stringent rules. Distrcits can then file bids with only those venors who are approved by the state	Rhode Island

First Name	Last Name	Email Address	Additional Comments	State
Ashley	Milun	amilun@kippteamandfamily.org		New Jersey
B.J.	Burgess	burgessb@greenbrierschools.org	Procurement decisions belong at the local level where people with critical knowledge of the requirements and the vendors is imperative to the proper selection of a vendor. The current competitive bidding regulations are sufficient and federalizing the procurement would undoubtedly have a negative impact on schools attempting to select the best and most cost effective solution for their needs.	Arkansas
Barbara	O'Donnell	bodonnell@rutherfordschools.org	Decisions must be kept LOCAL!!	New Jersey
Ben	Lewis	blewis@dcstn.org		Tennessee
Benjamin	Horne	bhorne@edisonschoolaz.org	Please keep the current bidding rules - IT Director for Edison School	Arizona
Bethany	Tocci	bethanyjj@aol.com		Maine
Billie	Bell	bbell@conchoschool.net	Please do not make the erate process anymore cumbersome than it is already.	Arizona
BJ	Peters	bpeters@esu13.org	We know our vendors well at the local level. We are better at evaluating services and products at this level than trying to do it at a national level.	Nebraska
Blake	Mayfield	blake.mayfield@wanrack.com		Missouri
Brad	Luna	bluna@lcdoe.org	The bidding process is complicated enough as it is. I believe this would dissuade some vendors from participating in the erate program. The current state and local laws are more than adequate to provide competitive pricing as it is currently structured.	Alabama
Brandon	Hall	brandon.hall@pembrokek12.org	Please add cybersecurity protections for schools!	Massachusetts
Brenda	Tapp	brenda.tapp@wanrack.com		Missouri
Brenda	Hynes	bhynes@ctpartners.net		Michigan
Brent	Haage	brent.haage@keokukschools.org	I cannot support the proposed changes that FCC is looking to make with this Notice of Proposed Rule Making (NPRM). Quite frankly, this NPRM offers no compelling evidence of what systemic problem it is attempting to solve, but is creating a cumbersome, bureaucratic solution to a problem that does to exist that will have an adverse effect on applicant and service provider participation alike.	Illinois
Brent	Edwards	brent.edwards@shoshonesd.org		Idaho
Brett	Walker	brett.a.walker05@gmail.com		Kansas
BRETT	STONEBERGER	brett.stoneberger@gmail.com	Local and State Education Agencies are at the tip of the spear. They know how to coordinate with Schools, School Districts and Libraries and help them achieve technology and broadband needs.	Ohio

First Name	Last Name	Email Address	Additional Comments	State
Brett	Warren	Brett@2020techs.com	We need to keep this Local	Nebraska
Brian	Davidson	brian@erate4schools.com	Removing local control of procurement processes would create operational and financial chaos for schools and libraries. One size will never fit all.	North Carolina
Brian	Mellendorf	bmellendorf@qnsk12.com		Illinois
Brian	Wilson	brian.wilson@ppsd.org		Rhode Island
Brian	Gorr	bgorr@ITsavvy.com		Illinois
Brian	Wilson	brianmwilson07@yahoo.com		Rhode Island
Brian	Borosh	brian-borosh@esasd.net		Pennsylvania
Brianna	DeWitt	brjack6@gmail.com		Nebraska
Brnden	Beachy	bbeachy@goshenschools.org		Indiana
Bruce	Jones	bruce@wpsinc.com		Texas
Bryan	Morrison	mhicustom1@gmail.com		Washington
Bryan	Frazier	bfrazier@claremore.k12.ok.us	We are 100% opposed against the bidding portal	Oklahoma
Bryan	Bloomer	bhbloomer@okcps.org		California
Bryce	Harper	bharper@sandwich.k12.ma.us	Please keep the current rules in place.	New Jersey
Bryce	Walker	walkerb@hssd.net	It's already too burdensome and complex.	Arkansas
Butch	Sims	butch.sims@goknights.us	Please keep procurement decisions at the local level.	Arkansas
BYRON	STEVENSON	pastorbyron2@gmail.com	The current system of procurement has worked relatively well, please don't make the process complicated and burdensome. Leave it as it is.	Florida
Carisa	Smith	csmith@usd397.com	Don't fix what isn't broken.	Kansas
Carl	Schultze	cschultze@sycomtech.com		Virginia
Carol	Etter	carol.etter@osceolaschools.net	This would be a hardship for our district to use duplicate systems for once a year purchases and possibly violate state and local procurement laws.	Florida
Casey	Ritchie	critchie@esc18.net		Texas
Casey	Karnes	ckarnes@bps14.org		Missouri
Chandler	Pettibone	pettibonechandler@gmail.com		Kansas
Charlene	Blohm	charlene@cblohm.com	Taking over competitive bidding processes for a program of this size, and with its long track record of success, makes little practical sense.	Wisconsin
Chelsi	Copsey	ccopsey@sbps.net		Nebraska
Cheryl	Morgan	cmorgan@scfls.org		Virginia
Chris	Mcmahon	cmcmahon@billeville118.org		Illinois
Chris	Cooley	ccooley@nthurston.k12.wa.us	We feel that local control over bidding is in the best interest of our taxpayers.	Washington

First Name	Last Name	Email Address	Additional Comments	State
Christian	Gemme	gemmec@sebrsd.org	I believe the proposed changes will have a negative impact on our ability to access and use these funds effectively. Thank you!	Massachusetts
Christine	Diggs	cdiggs@k12albemarke.irg	Please let school districts continue to follow local bidding guidelines for internet services	Virginia
Christine	Guthmiller	norby@comm1net.net	thank you for the e-rate program. it has allowed us to have great internet service. the current bidding process works very well for us. my small library would be adversely affected by this proposed change in bidding. thank you for listening.	Iowa
Christine	Thome	cthome@chicorporation.com		Ohio
Christopher	MacDonald	cmacdonald@drregional.org		Massachusetts
Christopher	Russell	carussell@deweyk12.org		Oklahoma
Christopher	Heck	C_Heck@lakeview.k12.pa.us		Pennsylvania
Cindy	Cabral	ccabral@techedservices.com	State and local procurement processes already in place are working, this new bidding portal and it's requirements will cause undue hardship on my clients as they attempt to garner eRate discounts. There are too many issues and questions, the existing online portals and processes need improvement. Adding another layer to an already complicated situation will make eRate very unattractive.	California
Cindy	Robertson	cindy.robertson@foukepanthers.org		Arkansas
Claire	O'Flaherty	claire@erateexpertise.com	The proposed federal bid portal will most certainly discourage vendors from submitting bids and will become a deterrent to competition.	Washington
Clayten	Cottles	ccottles@mesquiteisd.org		Texas
Cody	Pedersen	cpedersen@cellularoneaz.com		Arizona
Cody	Wright	cwright@warsawk12.org	I disagree with the E-Rate changes that have been proposed. I feel like USAC becoming the middleman in the procurement process will only make things more challenging. Purchasing decisions should remain local, based upon the needs that we have--many of which USAC will not be aware .	Minnesota
Colleen	Terrill	terrillc@seekonkschools.org	Please focus on cybersecurity readiness instead of changing the competitive bidding regulations	Massachusetts
Colleen	Gallagher	colleen.gallagher@wanrack.com	A one-size-fits-all solution may have the unintended negative effect of prohibiting new solutions and creative solutions from being proposed; possibly to the detriment of districts who would not be able to see all options the market has available to meet their needs cost-effectively.	Ohio
Colleen	ODonnell	codonnell@insightinvestments.com		California

First Name	Last Name	Email Address	Additional Comments	State
Corrina	McLaughlin	cmclaughlin@dynamicstrategiesllc.	The current bidding process works well. It allows Applicants to comply with their state's bidding rules & provides add'l E-rate program constraints to ensure a fair & open process. What is broken? If the FCC wants more visibility into the bidding process, they should require applicants to upload all bids received when they submit their 471 applications (after selecting a vendor). Like RHC does.	Tennessee
Cory	Yingling	cyingling@converse2.org		Wyoming
Cory	Boggs	cboggs@putnamcityschools.org		Oklahoma
cory	elzey	cory@abcerate.com		Ohio
Courtenay	Reece	courtenayre@millvillepubliclibrary.org		New Jersey
Dana	Allee	dana.allee@toledolibrary.org		Ohio
Dana	Pappalardo	d_pappalardo@sau9.org	The E-rate competitive bidding regulations do not need to be changed. The current regulations serve individual applicants, and the overall program, very well.	New Hampshire
Daniel	Poolman	daniel_poolman@roundrockisd.org		Texas
Daryl	McDaniel	daryl.mcdaniel@westernheights.k12.ok.us		Oklahoma
Dave	Termunde	dtermunde@atbor145.org		Illinois
David	McNurlen	iphone.daves@gmail.com	Please do not take the rights of local states to manage their procurement policies. These have been established through decades of use and should not be changed.	Washington
David	Fringer	dfringer@ghaea.org	We urge the Commission not to implement the proposed E-rate bidding portal. The FCC's proposal would negatively impact our ability to participate in the E-rate program. We believe that procurement decisions are best made at the local level, not by the Universal Service Administrative Company.	California
David	Gornstein	drgornstein@gmail.com	This proposed bidding process will be counterproductive; the program is already too complex for most schools. Old adage, if it's not broken why fix it? "What is the justification for turning the program "upside down?""	Illinois
David	Boss	david@networkcablingsolutions.net		Mississippi
David	Vincent	david.vincent@princetonisd.net	I believe it is in the best interest of the LEA's to be able to bid locally. If this process is federalized, then standards for local equipment is no longer valid. This would cause staffing increases, due to having to have multiple staff handling separate equipment.	Texas
David	Waldrop	david.waldrop@lwcharterschools.com		Florida

First Name	Last Name	Email Address	Additional Comments	State
DAVID	ANDRAS	daandras@stjohn.k12.la.us		Louisiana
David	Goldsmith	dgoldsmith@hanfordesd.org	This is a horrible idea, can't fathom how the commission came to the conclusion that a federal agency with no local insight would be the more appropriate path for procurement for LEA's with unique individual needs and requirements. Awful example of overreach where it's just not necessary.	California
David	Klusmann	david.klusmann@orecity.k12.or.us		Oregon
Dawn	Palermo	info@nexuserateservices.com		Arizona
Dawn	Belden	dbelden@bandrconsultingservices.org		Pennsylvania
Debbie	Kunz	dkunz@elkinsdistrict.org	Please, please keep the bidding process the same. It works well!	Arkansas
Dee	Benson	dee.benson@guthrieps.net	The current process works and maintains the integrity of the Erate program. This proposal would take us back to the days of waiting months to receive approval of funding.	Oklahoma
Denise	DeMeyer	ddemeyer@reedsville.k12.wi.us	Stop trying to make the Erate process more tedious than it needs to be.	Wisconsin
Denise	McNiel	denise@cocolib.org		Arkansas
Denise	Kenney	denise.kenney@imagineschools.org		Arizona
Deron	Meyer	deron.meyer@cpsrams.org		Nebraska
Diana	Closson	dclosson52@gmail.com		Nebraska
Dianne	Baker	BakerDB1@yahoo.com		Oklahoma
DJ	Scullin	dj@fortschools.org		Wisconsin
Domenic	Sergio	sergiod@Kingphilip.org		New Hampshire
Don	McDaniel	don.mcdaniel@arkansas.gov	State of Arkansas E-rate Coortinator	Arkansas
Don	Davidson	dondavidson@walthampublicschools.org		Massachusetts
Don	Dietrich	ddietrich@e-rateprofessionals.com	I support maintaining local control of the procurement process by schools and school districts.	Missouri
Donald	Collings	dcollings@tvcca.org	Please do not change the process for bidding the changes proposed are poorly thought out and will cause issues.	New York
Donlei	Mullinax	dmullinax@extremenetworks.com		South Carolina
Donnie	Morgan	dmorgan@usd452.org		Kansas
Doug	Taylor	dtaylor@duneland.k12.in.us		Indiana
Dustin	Cogan	dcogan@maquoketaschools.org	Rural American does not have the same providers as east/west coast	Wisconsin
Edward	Lucy	elucy@jpkeefehs.org		Massachusetts

First Name	Last Name	Email Address	Additional Comments	State
Edward	Wikstrom	ewikstrom@stdoms.org	Bidding through local vendors for Category 1 and 2 funds has yielded significant savings due to competition, and developing relationships with local vendors provide better service than national vendors, especially for smaller schools who rely on IT companies to help them maintain their systems.	New York
Edward	Willis	elwillis@morgank12.org	Not broken in Alabama.	Florida
Eliu	Paopao	eliu.paopao@chadronschools.net		Nebraska
Eric	Butash	ebutash@fgschools.com		Rhode Island
Eric	Flagel	eflagel7@yahoo.com		Illinois
Eric	Ripley	eripley270@mygfschools.org	Current regulations serve individual applicants and the overall E-Rate program very well and should not be changed	North Dakota
Eric	Stockmeyer	EStockmeyer@buffaloschools.org		New York
Erin	Johnson	Erin@eratecomplete.com		Iowa
Ernest	Nicely	ej@nicelydoneconsulting.com	There is no possible way that USAC could devise a system that successfully merges ALL procurement rules for every state. Let the states and local districts continue with their processes.	Arizona
Faith	Piazza	fpiazza@sjsf.dfrcs.org		Maine
Fred	Josephs	Fjosephs@csmcentral.com		New Jersey
Garrett	Moreno	gmoreno@usd507.org	Decisions should be kept at a local level.	Kansas
Gary	Michaels	gmichaels@summae-rate.com	Absolutely no Federal take-over!	California
Gary	Dobbs	gdobbs@crenshaw-schools.org		Tennessee
Geneva	Durkee	geneva.durkee@navajocountyaz.gov		Arizona
Gerry	Zeller	gzeller@zellerandassociates.com	We believe that standardizing the Form 470 response system will inhibit the proposals of alternative solutions that, at times, provide a much more cost effective solution. Secondly, the EPC itself is nowhere near as intuitive as commercial sites. We are loathe to see what screen views this new venture will provide. We encourage the FCC to forego the idea of standardizing bid responses.	Illinois
Ghaleb	AbuAlhana	director@tiaus.net	The E-rate competitive bidding regulations do not need to be changed. The current regulations serve individual applicants, and the overall program, very well.	Ohio
Ghislaine	Andrews	GAndrews@ecsdfl.us		Florida
Ginny	W.	snapgin@aol.com	The new bidding proposal will take local decisions out away from those who the people and entities most affected by them.	Ohio

First Name	Last Name	Email Address	Additional Comments	State
Gino	Petrivelli	Gino.Petrivelli@pomona.k12.ca.us	Please help school districts by preserving the current process.and consider updating the eligible services.	California
Giovanni	Tairov	director@mylpl.info		Louisiana
Grant	Wilson	ace@banner.k12.ok.us	Please do look at changes to the eligible services list to include Firewall and Security software services. we are looking at a $50,000 outlay to upgrade our next generation firewall services, and that does not really cover all the items that should be covered for true protection of a network.	Oklahoma
Greg	Simmons	cadets_myth_0d@icloud.com	keep it the same. No need for you to get involved.	Indiana
Heidi	MacGregor	hmacgregor@masscue.org		Massachusetts
Henry	Lawrence	Hank@ecserate.org	In my opinion the FCC's move to implement the E-Rate bidding portal would not only increase the risk of circumventing state and local competitive bid laws but also exclude local vendors from being able to participate. I have seen many applicants remove themselves from the program in recent years, this would only Exacerbate the problem	Louisiana
Henry	Stokes	hstokes@tsl.texas.gov		Texas
Ian	Hathcock	ihathcock@cellularoneaz.com		Arizona
Ignacio	Gonzalez	igonzale7@yahoo.com		California
J. Sara	Paulk	jspaulk@houpl.org	Director of public library in Georgia. 10+ years E-Rate experience.	California
Jack	Thome	jack@chicorporation.com		Ohio
Jaison	Widmer	Jaison.widmer@wanrack.com		Missouri
James	Hatz	jhatz@rushcity.k12.mn.us	Please consider making cyber security products/services erate elgible - schools are at a disadvantage in this area.	Minnesota
James	Nace	jnace@unorth.k12.in.us	Keeping the current e-rate bidding rules will continue to keep costs down and support community small and medium sized technology vendors.	Michigan
Jane	Kratochvil	jkratochvil@infiniteconnect.net	Keep Current Erate bidding at the local level	Illinois
Janelle	Morgan	janelle@elitefund.com	Please keep the local bidding rules!	Michigan
Jared	Perrine	jperrine@nrsd.org		Massachusetts
Jason	Brown	jbrown@sbschool.org		Massachusetts
Jason	Waddell	jwaddell@susanvillesd.org		California
Jason	Roussin	jroussin@windsorc1.com		Wisconsin
Jason	Baxter	jason_baxter@lonegrove.k12.ok.us		Iowa
Jason	Wilson	jason.wilson@christian.kyschools.u	Local bids allow for better service after the install. Local bidding invites competition for large corporations whose service is lacking.	Kentucky

First Name	Last Name	Email Address	Additional Comments	State
Jean	Welsh	jrwelsh@fcps.edu	FCPS needs to be able to maintain current state and local competitive bidding process. This process has provide the best pricing possible for our school district	Virginia
Jeanette	Lundgren	jlundgren@cwmars.org		Connecticut
Jeanine	Chatt	jchatt@nioga.org		Georgia
Jeff	Wale	jeff.wale@toledolibrary.org	Don't mess with eRate - changing the process will take years to perfect and we will end up with nothing new.	Ohio
Jeff	Kottong	jkottong@warden.wednet.edu		Washington
Jeff	Terry	jterry@rcps.us	Our district procurement rules require our County to control all RFP and bidding functions. This erate change would force us out of the erate program. As most districts, we rely on erate funds for our budgeting process.	Virginia
Jeff	Landes	jlandes@newcastle.k12.ok.us	The bidding regulations are more than sufficient. Please do not make changes.	Texas
Jeff	Jennings	jjenningshasmail@gmail.com	The FCC is attempting to wrest local procurement and decisions away from schools and libraries. This is a. complete overreach and should not be enacted.	California
Jeffery	Herbel	jaherbel@enidk12.org		Texas
Jeffrey	Harrison	jeff@dublinschool.org		New Hampshire
Jen	Barr	barrjen@cusd187.org		Illinois
Jennifer	Judkins	jjudkins@woburnps.com	No change is needed. Current structure complies with our municipal and state bidding rules. Please focus efforts on increasing support for cyber-readiness!	Massachusetts
Jennifer	Seneca	jseneca@mylpl.info		Louisiana
Jennifer	Overbay	joverbay@epiphanyconsultingnw.com		Washington
Jennifer	Clouser	jclouser@auburn.wednet.edu		Washington
Jennifer	Gier	jenny.gier@bayardtigers.org	We need the ability to generate bids with entities in our local areas and based on local needs. Omaha has very different needs and available resources than Arthur, Scottsbluff or Kimball. There is no need to pass this bill, it won't help rural Nebraska and it will certainly hurt us.	Nebraska
Jeremy	Coker	jeremy.coker@woodvilleeagles.org		Texas
Jeremy	Miller	millerj@mcsin-k12.org		Indiana

First Name	Last Name	Email Address	Additional Comments	State
Jeremy	Taylor	jeremy_taylor@ewg.k12.ri.us	The current category 1 erate process, while somewhat cumbersome, is still the best solution for selecting ISP providers. The flexibility to choose separate providers for transport and access makes it very competitive on a local level. The FCC should focus on expanding utilization and the breath of the program to include cyber security needs for districts.	Rhode Island
Jerod	Adkins	jeadkins@cisco.com	Keep the process local and the red tape to a minimum. The process is already burdensome and lengthy. We can't afford to slow the digitization of our K-12s any further.	Arizona
Jesiah	Clemons	jclemons@od.k12.in.us		Indiana
Jesse	Porter	jporter1@pps.net		Oregon
Jill	Stone	jstone@aeserate.com		
Jill	Hobson	katherine.hobson@gcssk12.net	Local control is Key to ensuring districts are able to purchase the correct technologies to support their local needs. Please don’t take this away!	Georgia
Joanna	Laramore	jlaramore@sycomtech.com		Virginia
Joe	Stergis	jstergis@cbrsd.org		Massachusetts
Joe	Park	jpark@sttheresenorth.org		Missouri
John	Collins	jcollins@wbridgewater.com		California
John	Lee	john.lee@cvetech.com		Utah
John	Thome	jthome@chicorporation.com	We have to make sure our schools have good cybersecurity solutions in place. This significantly reduces the risk of cyber attacks and protect against the unauthorised exploitation of systems, networks and technologies.	Ohio
John	Profitt	john.profitt@lee.kyschools.us		Kentucky
John	Peters	john.peters@lyndoninstitute.org	The proposed rule is nothing more than an attempt to thwart local education agencies in futherance of creating an Education Industrial Complex and more corporate welfare to the benefit of large corporations.	Vermont
John	Poland	john_poland@boces.monroe.edu	Not broken, don’t fix.	New York
Johnny	Sloan	sloanj2@pcsstn.com		Tennessee
Jonah	Johnson	jjohnson@isd741.org		Minnesota
Jonathan	Evans	jeevans@onetelgem.com		Utah
Jonathan	Stuckel	jstuckel@midcolumbialibraries.org		Washington
Jordan	Leet	jordanleet22@gmail.com		Virginia

First Name	Last Name	Email Address	Additional Comments	State
Joseph	Passante	joepassante@yahoo.com	Please keep the bidding process as it is, with local control. We're the ones who know what vendors have a history of delivering and supporting a quality service or product.	North Carolina
Josh	Shepard	jshepard@sdoc.org		South Carolina
Josh	Chisom	josh@lucky-thirteen.org	The E-rate program is predicated on applicants obeying their state and local procurement laws and policies. These proposed changes would force many applicants to break those laws.	California
Joshua	Schoeneck	joshua.schoeneck@kmlhs.org	Please keep the current bidding process in place for Internet Service. The proposed changes will make the E-rate process more complicated.	Wisconsin
Justin	Martin	jmartin@westerncusd12.org		Illinois
Justin	Shea	justin.shea@connection.com		New Hampshire
Justin	Black	jblack@rochester.wednet.edu	We need to have local control over the bidding process. This allows us to work within your communities and for our communities. Local control is an important process in securing products for E-rate.	Washington
Karen	Winsper	karenwinsper@norton.k12.ma.us	Please focus on funding cybersecurity readiness for schools and not changing the current system.	Massachusetts
Kate	Brandley	kbrandley@sjp2ca.org		Virginia
Kathleen	Melgar	kmelgar@asburyparklibrary.org	We are a small urban local library that has relied on ERATE funding for many years. This change would add a burden to us because we have limited staff so only one person has training to handle erate. Please reconsider since this task would only make it more difficult and time consuming.	New Jersey
Kathy	Goldfine	kgoldfine@maplewoodlibrary.org		New Jersey
Kathy	Savonburg Public L	savonburglibrarian@gmail.com	E-rate has been very beneficial to providing internet service to our small community. We believe that procurement decisions are best made at a local level. We have worked with a couple different providers in this area. We are able to judge their service based on local delivery and reviews and cost.	Missouri
Kaylie	Nabors	kaylie@hscsol.com		Louisiana
Ken	Bockwinkel	kbockwinkel@oakleyschoolsks.com	Oakley Public Schools is opposed to the creation of a bidding portal for Erate services. The ability to choose proven vendors who have a history of taking care of our district is very important to us. The current system allows for competitive bidding already. Please contact me if you have questions.	Kansas

First Name	Last Name	Email Address	Additional Comments	State
Kendra	Cress	kendracress@gmail.com		Kansas
Kenneth	Harshberger	harshberger@usd226.org	Meade USD 226 is a small community and we work hard to support local business in our small community who provide outstanding service for internet service. Because our internet needs are tiny in comparison to large urban district, we get better services from more local providers. The nationwide phone and internet providers have little interest in serving a small community and school like ours.	Kansas
Kerry	Mebane	kmebane@ecps.k12.nc.us		North Carolina
Kim	Eick	keick@coshoctonlibrary.org	I believe the current system achieves the goal of getting goods and services at a competitive price.	Ohio
Kim	Myers	kimmyers@collinsville.k12.ok.us		Oklahoma
Kinzie	Wooderson	kinzie.wooderson@lsr7.net		Missouri
Kristin	VanStrien	kristin.vanstrien@iu1.org	Districts and libraries work very hard to make sure they meet guidelines. This would be an unnecessary burden added to the process because of the various groups we go through for approval before submittal. This system does not need to be changed.	Pennsylvania
Kristin	Looney	kristin.looney@windstream.com		Iowa
Kristina	Garrett	kristina.garrett@e-rateeducationalservices.com		South Dakota
Kyle	Browne	kybrowne@cisco.com		Kansas
Lance	Custer	lcuster@usd219.org		Kansas
Lance	Shelite	lance.shelit@guymontigers.com		Oklahoma
Larel	Reimann	larel.reimann@hshawks.com	Please leave the current E-Rate bidding rules in place. We need more local control, not less.	Nebraska
Larry	Bennett	larry.bennett@durantisd.org		Oklahoma
Larry	Cravens	lcravens@ktc.edu	These changes would cause damage to the bidding process and not take into consideration engineering, equipment quality, service quality and other factors that are necessary for the successful installation, delivery and use of products and services through this program. No data has been provided that the current system that is in place in not working. It shows that it is actually working very well.	Oklahoma
Laurie	Walker	lauwalke@cisco.com		Virginia
Laurie	Ortega	laurie.ortega@pioneerland.lib.mn.us		Minnesota

First Name	Last Name	Email Address	Additional Comments	State
LAWRENCENE	PRICKETT	lprickett@cellularoneaz.com	Removing local control in this process creates and adverse relationship between USAC and funds recipients. What is the real goal? Is USAC performing its current role flawlessly? Why not focus on improving the application process to improve consistency? Or updating the eligibility list so applicants have greater clarity and ease of use? Stop trying to over-manage a working process.	Arizona
lilli ann	johnson	lillisr@jwp-inc.com		Ohio
Linda	Swope	swopels@charter.net	Bidding needs to stay like it is.	Tennessee
Lori	Thompson	lori@btu-consultants.com		Missouri
Luke	Reed	lreed@amstoledo.org		Ohio
Lyndal	Jenkins	ljenkins@sipanthers.k12.mo.us		Missouri
Madison	Oyler	madison.oyler@wanrack.com		Missouri
Malinda	Tozer	malindato@millvillepubliclibrary.org		New Jersey
Mandy	Shipley	mshipley@hoxie.org	This would take away the preferences we have for local bidders. Not everyone wants the feds to make all the decisions. This is a decision that should remain in the hands of each district, as they know their vendors and community better than anyone else.	Kansas
Marc	Johnson	mjohnson@ecmecc.org	The competitive bidding process is already very robust at the local level. Please keep it there where it belongs.	Minnesota
Margie-Jo	Miller	margie-jo.miller@pacyber.org	After 16 years of submitting for E-rate funds for several schools, processes to improve the system are appreciated, but confusing and potentially time consuming changes are not welcome. Thank you for considering all aspects of the proposed change to the bidding process.	Illinois
Marial	Lawson	mflawson@aldineisd.org		Texas
mark	gabehart	mark_gabehart@roundrockisd.org		Texas
Mark	Norton	mnorton@npusc.k12.in.us	Removing competitive bidding process will only result in higher costs to schools for access.	New York
Mark	Leslie	mark.leslie@richlandone.org		South Carolina
Mark	Gadbois	mgadbois@lincolnps.org		Rhode Island
Mark	Lancaster	mlancaster@pps.net	This proposal would violate our local procurement rules and will lead to the loss of funding for the school district to provide network services for students.	Oregon

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Marla	Phillips	mcphllps@memphis.edu	I urge the Commission not to implement the proposed E-rate bidding portal. The FCC's proposal would negatively impact our ability to participate in the E-rate program. I believe that procurement decisions are best made at the local level, not by the Universal Service Administrative Company.	Tennessee
Mary	Lewis	mjlewis@pcsd1.org	We don't want any changes in the bidding rules, local areas know best what works in their area. We like the RFQ process where we can set what is important to us in a vendor which isn't always related to price.	Wyoming
Mary	Hensley	Mary_Hensley@engschools.net	This would be a very destructive change to make and would cause many E-rate applicants a lot of problems with their competitive bidding process.	Colorado
Mary Beth	Quinn	mbquinn@sturgischarterschool.org		Missouri
MELINDA	MILLER	melinda.miller@imesd.k12.or.us	This proposed bidding portal will be incredibly harmful to a successful program. Service providers are already discouraged by the EPC portal navigation and could possibly withdraw from even participating in E-rate, especially small, local providers. Leaving schools with no other option than to not apply for E-rate because their provider is no longer a registered SPIN.	Oregon
Melissa	Barton	mabarton@usd397.com	Leave our networks alone!	Kansas
Melissa	Riley	mcropane@hotmail.com		New Jersey
Melissa	Riley	melissa.riley@ricoh-usa.com		New Jersey
MERRICK	SMITH	merricksmith@caldwelledu.org	Small, rural districts like ours have at most one or two companies who even bother to bid. We are not able to afford to install or rebuild our WAN at the decision of federal officials who are not in our position and have no understanding of how our connectivity would be impacted. We have established support relationships with vendors in our state and need local support.	Louisiana
Michael	OBrien	michael_obrien@sudbury.k12.ma.us		Massachusetts
Michael	MacMillan	mmacmillan@monomoy.edu		Massachusetts
Michael	Staton	mstaton@myipl.org	Library Director Iberville Parish Library	Louisiana
Michael	Sisson	msisson@bps14.org	The FCC should be considering offering support for cybersecurity not fixing something that is not broken.	Missouri
Michael	Keough	michael.keough@esc16.net	For rural communities doing away with the current system would be detrimental to small schools	Texas
Michael	Morrison	mmorrison@lakeridgeschools.net		Indiana

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Michael	Jamerson	mike.jamerson@adtecerate.com	As the retired Director of Technology for a large K-12 public school district, I have been involved with the E-Rate program since 1998. I urge you to put your efforts into improving the basic operation of the EPC site rather than expending effort to re-invent the competitive bidding process.	Indiana
Michael	Brandau	michael.brandau@beaufort.k12.sc.	For over 20 years the Beaufort County School District has successfully conducted its procurement processes in compliance with the existing local, state, and E-rate procurement rules. The proposed change would add an unnecessary layer of complication to a process that is working, and has worked, well. This additional burden on applicants will likely reduce participation in a valuable program.	North Carolina
Michael	Bos	michael.bos@borgerisd.net	Nothing more really needs to be said. This is completely unnecessary and the reasons are obvious.	Texas
Michelle	Johnson	johnsonm47@hcsedu.org	Please keep control of bidding to local level. I use the bidding process to be accomplished along with a required walk-through. This allows me to ensure that the resulting project is successful. We will have more control on what we actually need in our location.	Tennessee
Michelle	Watt	michellewatt@susd.org		Arizona
Michelle	Tindle	mtindle@mcalester.k12.ok.us		Oklahoma
Mike	Ward	mward@usd507.org	We need to have the ability to sign with local vendors to support local business and to ensure we have local maintenance support	Kansas
Mike	Bauhs	mbauhs@extremenetworks.com	As someone who's been in K12 technology for over 20 years, this is the most reasonable change to the e-rate rules I've seen.	Wisconsin
Mina	Young	Mina.Young@pusd.org		California
Missy	Studley	missy@elitefund.com	Please keep local bidding rules!	Michigan
Monica	Santiago	msantiago@canyon.k12.ca.us		California
Monica	Ross	mross@qeschools.org		North Carolina
Nancy	Griffin	ngriffin@yaleok.org		Oklahoma
Natalie	Croteau	ncroteau@littletonps.org		Massachusetts
Natalie	Coffin	natalie.brauer@esu5.org		Nebraska
Nathan	Humphrey	nhumphrey@garfield16.org		Colorado
Nick	Gentry	nick.gentry@wanrack.com	Complicating Gov't programs - not good!	Missouri
Nicole	Whitfield	whitfieldn@versaillestigers.org	This process is already difficult enought for someone doing it with all of the different forms and the current online portal that you want to make another one for bidding? When does it stop?	Missouri

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Oliver	Frail	OFRAIL@SERVICEASSOC.COM		North Carolina
Oliver	Baez	oliver.baez@ricoh-usa.com	The proposed changes will significantly impact the ability for vendors to compete for the services requested, which will drive up the prices. Additionally, the new changes will delay the bidding process and will impact the schools and libraries from having their services installed and operational in a timely maner.	Georgia
Patrick	Taylor	ptaylor@davidson.k12.ok.us	Local decision making is important in picking out a provider from the bids received. Cost is important but I have certain qualifying factors that my vendor has to meet. Like vendor being local enough to respond quickly to repair any failing equipment installed. I don't want just a fly by night company installing important components on my network.	Oklahoma
Patrick	Robinson	pkrobinson@jonesk12.org	We have vendors that we consider partners in which we get value added services after the sale. We do not need out of State vendors drop shipping us equipment or providing services and then disappearing. Additionally spending funds with local/in State vendors is just good business.	Mississippi
Patrick	Doyle	pdoyle@e1b.org	What we have in place has been working for years. In NYS, this chnage would violate current state bidding rules for education. Applicants would not ne able to apply for e-ate anymore.	New York
Paul	Westbrook	pwestbrook@msdr9.org	Please concentrate efforts on our biggest need right now; funding for Cybersecurity!	Missouri
Peter	Royer	pete@lctn.org	What issue is the FCC solving with this suggested rule? I already get random quotes, many times the products quoted are not even what I am asking for.	Minnesota
Peter	Santos	peter.santos@ppsd.org		Rhode Island
Phil	DeYoung	pdeyoung@colbyeagles.org		Kansas
Philip	Decker	pdecker6068@gmail.com	Local procurement will work better than federalizing this process	Georgia
Pierre	Dehombreux	pdehombreux@wusd.us	There are aspect of services that are unique to the local area. Someone outside this area does not know and would award a contract to a company that is not capable to deliver properly. This would effect, especially rural areas. For us, national vendors are the plague as they don't have the local resources and understanding.	Arizona
Rachel	Vessar	vessarr@maysville.k12.mo.us	Adding cybersecurity to E-rate would greatly help rural schools to be in a better position to afford them.	Missouri
Randy	Sharp	rsharp@bisdtx.org		Texas

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Randy	Elzig	randye@tcoe.org		California
Randy	Mifflin	rmifflin@cellularoneaz.com	Small rural schools need to keep their voice	Arizona
Rhonda	Rolen	library@cocolib.org	Dear Chairwoman Rosenworcel, Commissioners Cark, Starks, and Simington,	Arkansas
Richard	Litchfield	rlitchfield@microk12.com	Our local bidding rules are very strong her in Washington State. The district have learned a great deal over the last several years on how to process a 470 and a 471. To make another change would set the program back several years. I believe our local bidding rules servers our community very well.	Washington
Richard	Salem	salemrim@cbhs.edu		Ohio
Richard	Nuttall	mr.richard.nuttall@gmail.com		Colorado
Richard	Sachlis	rsachlis@covington.k12.va.us	If it's not broken, don't try to fix" it. This is a trite saying but it is certainly valid in this case."	Virginia
Rob	Wnuk	rwnuk@mgrhs.org		Massachusetts
Robert	Walton	waltonb@worcesterschools.net	USAC is already overwhelmed with its ability to process ERate and ECF applications. And the FCC already has a large backlog of appeals. I believe further complicating the rules will create a gridlock in procurement that will lead to years delays in funding.	Texas
Robert	Yost	yostr@fcpsk12.net	It is already difficult enough to navigate the the current ERATE program rules without interference from FCC legislation for procurement. Fix the awful EPC website.	Virginia
Robert	Smith	robert.smith@libertyps.org	negatively impact our ability to participate in the E-rate program	Oklahoma
Robert	Turner	bobturner2416@gmail.com	Please do not make a Federal bureaucracy the reason why people do not have adequate access to the Internet. The proposed portal may not fix the problem and will frustrate the citizens.	New York
Roberta	Ward	rward@deltacommunityaction.org	We are a small Head Start agency, we are limited on our choices and this would make it even more difficult	Oklahoma
Robin	Baker	RobinBaker@aol.com		Ohio
Russell	Thornton	russell.thornton@owassops.org		Oklahoma
Rusty	Tuman	rusty.tuman@usd480.net		Kansas
Rusty	Tuman	rtuman@usd217.org	At the very least we need the right of refusal.	Kansas
Ryan	Cox	ryan.cox@isd742.org	Why change what is working so well.	Minnesota

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Ryan	Dutton	ryan.dutton@osceolaschools.net	Removing decision making from us could lead to serious issues not being taken into consideration. The hardware solutions may not be compatible with our current security, authentication, or monitoring devices forcing us to spend more Capital on hardware and resources to support the solution. We would need to invest more resources to test, implement, manage, and troubleshoot the solution.	Florida
Ryan	Hoffman	ryan.hoffman@kirbyvillebraves.org	The current system is place is well-suited the the diverse needs of the organizations that the E-rate program supports. Changing the competitive bidding process will only create undue burden and confusion in the education industry at a time when most educational organizations gone well beyond reasonable effort to adapt to challenges from the pandemic.	Missouri
Ryan	Hickenbottom	ryan@2020techs.com		Iowa
Sandra	Sexton	ssexton@hondoisd.net	The current bidding system promotes a fair and open bid process, while still allowing school districts the ability to follow local bidding procedures to find the best service for their district.	Texas
Sarah	Njuguna	mrsn0817@gmail.com		Oklahoma
Sarah	Massey	smassey@cuyahogafallslibrary.org		Ohio
Sarah	Bryant	sarah.laugherty@gmail.com		Kentucky
Scott	Richie	srichie@five-startech.com		Indiana
Scott	Kallenberger	skall@toppenish.wednet.edu		Washington
Scott	Truskowski	struskowski@ashwaubenonk12.org		Wisconsin
Seth	Deniston	sdeniston@cdaschools.org	There are already enough regulations at the state and local level with regard to purchasing. Please do not add more complexity and hoops to jump through.	Idaho
Shaman	Anderson	shaman.anderson@hpe.com		Oregon
Shane	Knutson	sknutson@moraschools.org		Minnesota
Sharon	Lakey	sharonklakey@gmail.com	The Founding Fathers wanted a decentalized government.	Oklahoma
Shaun	McFadden	shaun.mcfadden@connection.com		Massachusetts
Shawn	Parker	sparker@brentwoodmoschools.org	Unneeded and unacceptable change that will negatively impact public school districts.	Missouri

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Shawn	Crouch	scrouch@warsawk12.org	I disagree with the E-Rate changes that have been proposed. I feel like USAC becoming the middleman in the procurement process will only make things more challenging. Purchasing decisions should remain local, based upon the needs that we have--many of which USAC will not be aware of. Rather than federalizing procurement, the public would be better served if the Commission would focus on updating t	Missouri
Sheryl	Abshire, Ph.D.	sheryl.abshire@gmail.com	There is no valid reason to change the Erate bidding rules As a CTO who worked since year one on Erate, it has been abundantly clear that states and local districts have created valid and effective purchasing and bidding protocols and laws that have served Erate well. It is important to not disrupt these effective processes.	New Jersey
Solimar	Cruzado	scruzado@bostonpublicschools.org		Massachusetts
Stephen	Miller	stephen.miller@responsive-service	As a former CTO, IT Director, and vendor in the rural ERATE markets of Texas and New Mexico for 20 years, I know that responsiveness and flexibility of the current local bidding rules are far better than federal could ever be. Every entity is different and the needs and methodologies need to vary accordingly.	Texas
Steve	Bergeron	steve.bergeron@wanrack.com	The E-Rate process as it stands today is the fairest process for bidding on services for school districts. Making a centralized government run portal for competitive bidding would harm the competitive process where smaller companies would have less opportunity versus large incumbents and hamper the progress of fiber network construction throughout the country which is the purpose of the IIJA.	Minnesota
Steve	Bistrup	steve.bistrup@milaca.k12.mn.us	The process does NOT need to be more complex than it already is. What we really need are more eligible items.	Minnesota
Steve	Vogelsong	svogelsong@wssd.k12.pa.us	The current bidding rules are fair and let us at a local level award contracts based on state and federal guidelines.	Pennsylvania
Susan	Clair	susan.clair@doe.virginia.gov	Procurement departments have existing procedures and systems for their purchases. How does the use of a different system once-a-year for E-rate purchases impact the odds that a mistake will be made in the competitive bidding process? Is it duplicative of the FCC to require these applicants to use a different system? Could applicants have the option of using their existing portal?	Virginia
Tali	Beaudean	tbeaudean@saxonylutheranhigh.org		Missouri
Tammara	Price	tprice@converse2.org		Wyoming

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Tammi	Dantoni	tammi.dantoni@baldknobschools.c	This is in no way appropriate. How can anyone else determine what is best for their entity, but the entity itself? We have many vendors that submit a number just to be submitting something. What happens when this is the low number and in no way meets the entity's needs? I reiterate, this is not appropriate.	Arkansas
Taryn	Crossno	crossnot@kellyvilleschools.org		Georgia
Teresa	Macdonald	tmacdonald@yisd.net		Texas
Tim	Peltz	tim.peltz@rusd.org		Wisconsin
TJ	Carron	TJCarron@baypath.net		Massachusetts
Todd	Fritsche	toddfritsche@gmail.com		Connecticut
Todd	Freer	ttfreer@gmail.com		California
Tom	Kimball	tkimball0325@gmail.com		Washington
Tom	Lundquist	Tlundqui@staunton.k12.va.us	I am against modifying the procurement rules and established regulations of the ERate system. Rather than federalizing the procurement of E-rate eligible goods and services, the public would be better served if the Commission would focus its efforts on the following two areas: (1) updating the existing E-rate eligible services list, and (2) instructing USAC to improve the EPC online application.	Virginia
Tom	Sextro	t.sextro@holtonks.net		Kansas
Traci	Taylor	traci.taylor@swplains.org	In our extremely rural area there are few options to get reliable internet service with the ability to get local help with technical issues. If there is a universal bidding portal, how will someone in a metropolitan area know what will actually work in a rural community of under 500 people?	Oklahoma
Tracy	Henness	henness@rccs.us	The process is cumbersome enough and does not need to add more paperwork to the process. Some of the staff responsible for procuring the needed services every year are full time teachers who need to also prepare lesson plans, grade assignment submissions, attend staff meetings, sponsor clubs, monitor student activities, and the list goes on. We greatly appreciate the funding that we receive throug	Wisconsin
Trent	DeLoach	deloacht@jcdragons.k12.ar.us		Louisiana
Troy	Rhoads	troyrhoads@clevelandtigers.com		Oklahoma
Van	Johnson	vjohnson@tsd401.org	Bidding needs to be based on local procurement rules.	Wyoming
Víctor	Hopper	vhopper@auhsd.net		California

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Vilas	Fallis	Vilas.Fallis@k12.sd.us	This would cause more confusion in regards to the bidding process, especially for schools located in remote areas.	South Dakota
Walter	Hoornstra	butch@gainesville.k12.mo.us	The FCC does not need to interfere with the current E-Rate System; it NEEDS to offer better Cyber Security training to the ones that need it in these types of Educational Systems	Missouri
Wayne	Wedge	waynewedge@panama.k12.ok.us	Local sites are better qualified to make a timely, quality internet/broadband service provider decision following the already established guidelines.	Oklahoma
William	Tollefson	btollefson@ci.k12.mn.us	Changes to the E-rate bidding process are both unnecessary and would become untenable at the local level. Please do not vote to change this. This move would represent a very poor public policy change.	Minnesota
William	Stein	steinwa@mvschool.org	Dear Chairwoman Rosenworcel and Commissioners Carr, Starks and Simington: We urge the Commission not to implement the proposed E-rate bidding portal. The FCC's proposal would negatively impact our ability to participate in the E-rate program. We believe that procurement decisions are best made at the local level, not by the Universal Service Administrative Company. The E-rate funding program is	Michigan
William	Bain	wbain@sussex.k12.va.us	26 years experience as E-Rate applicant - Process has become MORE cumbersome and confusing each year in spite of FCC efforts to keep it simple and accessible. Adding more burden would not help any applicant. Applicants should have the ability to select a high quality soultion that fits into their existing environment without a ton of extra paperwork.	Virginia
William	Schnering	jason@edge4kids.org	A company that you disqualify after a verbal communication may not be apparent at face value of a bid. We are still required to keep documents for ten years if there is an issue. this is unnecessary	New Jersey
william	white	dwhite@idabelps.org	To have a strong vibrant internet, our local municipalities should be utilized at all costs to make sure the services are available to support local users. It would help if schools, etc. supported and used local resources.	Florida
Zach	Close	zclose@rrsec.org		Minnesota