



## SCHOOL ADMINISTRATORS OF MONTANA

*Visionary leaders united in providing, advocating, and creating education excellence for Montana students!*

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Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554

July 26, 2019

On behalf of the School Administrators of Montana (SAM) representing the voice of Montana school and district administrators, we are writing today in response to the Federal Communications Commission's (FCC) Public Notice, which among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate.

SAM believes technology is an integral part of our culture, and presents ever changing challenges and opportunities for our students. Pedagogically, blended classrooms that integrate technology and rich media resources have become essential in the 21st Century classroom. Educational services requiring technology, however, are not available to all Montana Students. Further, schools throughout Montana struggle to finance critical technology infrastructure. Our students require access to digital resources to compete globally in careers and college upon graduation.

The USF is a system of telecommunications subsidies and fees designed to promote and expand universal access to telecommunications. Authorized by the Telecommunications Act, it was created to support and serve schools and libraries across the United States. With that in mind, the goal of the E-Rate program is simple: equitable access to affordable connectivity. E-Rate is vital in supporting and assisting Montana schools with access to online resources, communication and collaboration. The program has proven critical in the extensive expansion of connectivity for Montana schools. While the overwhelming majority of Montana's schools are connected, E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity access to high-speed broadband.

Montana is a rural state. As such, the proposed rule change would pair E-Rate for schools and libraries with rural health care under a single cap. This is of great concern to Montana, because while E-Rate is currently undersubscribed, school and library demand will only continue to grow. Even if connectivity prices continue to fall, the reality of increasing demand and skyrocketing costs with rural health care create a scenario whereby USF programs are pitted against each other, with rural schools competing with rural health care for connectivity needs. This should not be an "either, or" funding approach. The USF program was designed to address four distinct connectivity needs, a core tenet this proposal blatantly disregards. The proposed cap creates an arbitrary competition between complementary programs, specific to Montana, and threatens to undermine the viability of the overarching program.

In closing, the School Administrators of Montana believe that if the proposed rule making changes are implemented, Montana's schools, and the educational opportunities for our students, would be significantly, and negatively, affected. Further, the proposed funding caps to USF and its specific programs are short sighted policy that will undermine the ability of our schools to continue to address growing connectivity needs. SAM strongly urges you to consider the effects this proposal will have Montana's schools, and ultimately upon the education of our students.

Sincerely,

*Rick Duncan*

Rick Duncan  
Chairman, Delegate Assembly Steering Committee  
School Administrators of Montana

Kirk J. Miller, Ed.D.  
Executive Director  
School Administrators of Montana