



Advocates for Rural Broadband

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July 7, 2014

Filed Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 13-184

Dear Ms Dortch:

On Wednesday, July 2, 2014, Betty Buckley of the Washington Independent Telecommunications Association (“WITA”); and Derrick Owens, Noah Cherry and Gerry Duffy representing WTA - Advocates for Rural Broadband (“WTA”) met by telephone with Nicholas Degani, Legal Advisor – Wireline to Commissioner Ajit Pai, to discuss the experiences of rural local exchange carriers (“RLECs”) with the Schools and Libraries (“E-Rate”) Program in the State of Washington.

The E-Rate Program in the State of Washington is dominated by the K-20 Educational Network (“K-20 Network”), which connects colleges, universities, K-12 school districts and libraries across the state. Several large transport providers, including CenturyLink and the Northwest Open Access Network (“NOANET,” an electric public utility district consortium), furnish backbone facilities that connect the schools and libraries in various regions to the K-20 Network.

The major issue faced by WITA and its RLEC members is that they have not been allowed to apply for inclusion on the state Tier 1 Vendor List, and consequently are not invited to bid on the E-Rate projects and services of the K-20 Network and the school districts for which it contracts. The effect of this has been to exclude Washington RLECs from the ability to bid on projects serving approximately 191 local schools within their service areas. This has resulted in significantly higher costs for the E-Rate Program, because RLECs are familiar with the telecommunications needs of their local schools and libraries and the options for meeting them, and have been able to show local authorities how they could satisfy their broadband service needs at substantially lower costs without sacrificing service quality. A prime example of this is the substitution of less expensive switched services for special access lines for smaller rural schools and libraries. Whereas dedicated special access lines may make sense for large urban schools and libraries, less expensive switched services can readily handle the lower levels of traffic generated and received by smaller rural schools and libraries without any decrease in service quality. To be specific, most Washington RLECs can currently provide 1 Megabit per student service to local schools, and all Washington RLECs will be able to provide that level of service by 2018. Whereas 1 Megabit/student service can be provided over special access lines, Washington RLECs can provide it over switched access lines at 20 percent of the cost.

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WITA is not asking, at this time, for the Commission to pre-empt or to take any other action directly with respect to the State of Washington's Department of Commerce, which oversees the state E-Rate Program. However, the Commission does have the authority to condition its distribution of federal E-Rate and other Universal Service Fund support, and could use this power to ensure that compliance with its E-Rate competitive bidding requirements includes notice to and fair consideration of small local telecommunications carriers. WITA pointed out that its RLEC members not only have excellent service and technical qualifications and long-term familiarity with the needs of rural schools and libraries, but also are increasingly able to transport traffic between rural schools and libraries, and statewide or regional urban hubs.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceeding.

Respectfully submitted,

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