



Advocates for Rural Broadband

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President

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November 5, 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 Monday, November 3, 2014, Derrick Owens, Patricia Cave and Gerard Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Nicholas Degani, Legal Adviser – Wireline to Commissioner Ajit Pai, to discuss the Commission’s revised definitions of “urban” and “rural” that determine whether a school or library district qualifies for the additional rural discount under the E-Rate Program.

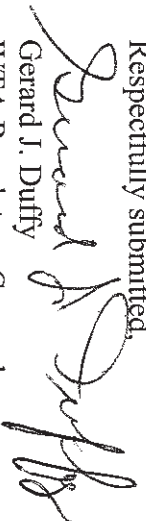
WTA pointed out that the recent addition of “urban clusters” of 2,500 people or more to the definition of “urban” has unexpectedly disqualified many small rural school and library districts that have long received and depended upon the additional 5-to-10 percent rural E-Rate discount. WTA noted that the Census Bureau itself has cautioned federal and state agencies against adopting its definitions of “urban” and “rural” wholesale without investigating their impact upon the purposes and operations of specific programs.

WTA indicated its support for proposals by various interested parties to revise further the definition of “urban” for E-Rate rural discount purposes to include urbanized areas (communities of more than 50,000 people) and communities having more than 25,000 inhabitants. This revised definition would allow schools and libraries in areas that have long been considered to be “rural” to continue to qualify for the E-Rate rural discount.

Given that many schools and libraries are currently planning their E-Rate programs, budgets and purchases, WTA urged that revision of the “urban” and “rural” definitions be undertaken and implemented as soon as possible.

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,

  
Gerard J. Duffy  
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