cc: Nicholas DeMali

Email: ed@freeshoes.org
Telephone: (202) 690-0830
Washington, DC 20037
2120 L Street NW (Suite 300)

Bios: Monica/Monkosh, Dicken, Dufy & Peadroff, LLP
Respectfully submitted

Public record of the referenced proceeding.

Pursuant to section 1.1206 of the Commission’s Rules, this submission is being filed for inclusion in the possible.

WTA urgent that revision of the “urban” and “rural” definitions be undertaken and implemented as soon as possible.

Given that many schools and libraries are currently planning their E-Rate programs, budgets, and applications,

areas that have been considered to be “rural” to continue to qualify for the E-Rate Program.

WTA urges the Commission to consider whether the urban and rural definitions used by the Commission accurately reflect the impact of the E-Rate Program.

WTA recognizes that there have been concerns expressed about the definition of “urban” and “rural” used by the Commission.

WTA further recognizes that the revised definitions should be consistent with the definitions used by other federal agencies.

WTA submits this letter in support of proposals by various interested parties to revise the definitions of “urban” and “rural” used by the Commission.

WTA requests that the Commission consider the following:

1. The definition of “urban” should be revised to include all school districts and libraries located in the 25% of the population that are “urban”.

2. The definition of “rural” should be revised to include all school districts and libraries located in the 75% of the population that are “rural”.

WTA submits this letter in support of proposals by various interested parties to revise the definitions of “urban” and “rural” used by the Commission.

Dear Ms. Dorfman,

RE: WC Docket No. 13-184

November 5, 2014

Monica/Monkosh, Dicken, Dufy & Peadroff, LLP

Advocates for Rural Broadband

Executive Vice President
KeyVision Wireless

President
Man in Charge