

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Modernizing the E-rate)
Program for Schools and Libraries) WC Docket No. 13-184

**COMMENTS OF PCIA – THE WIRELESS INFRASTRUCTURE ASSOCIATION AND
THE HETNET FORUM**

I. INTRODUCTION

PCIA – The Wireless Infrastructure Association and The HetNet Forum, a membership section of PCIA (“PCIA”),¹ respectfully submit these comments on behalf of their members in response to the Federal Communications Commission’s (“FCC” or “Commission”) March 6 Public Notice on the modernization of the E-rate program for schools and libraries.²

PCIA remains supportive of the Commission’s efforts to modernize the E-rate program for schools and libraries.³ In the Public Notice, the Commission seeks further clarification on,

¹ PCIA is the national trade association representing the wireless infrastructure industry. PCIA’s members develop, own, manage, and operate towers, rooftop wireless sites, and other facilities for the provision of all types of wireless, telecommunications, and broadcasting services. PCIA and its members partner with communities across the nation to affect solutions for wireless infrastructure deployment that are responsive to the unique sensitivities and concerns of each community. The HetNet Forum, formerly The DAS Forum, is a membership section of PCIA dedicated to the advancement of heterogeneous wireless networks. “Heterogeneous networks” combine “macro,” or large, infrastructure such as monopoles with small cells and distributed antenna systems. By integrating the two types of infrastructure together, carriers are able to target geographic areas to increase network capacity.

² Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization, WC Docket No. 13-184, Public Notice (rel. March 6, 2014) (“Public Notice”).

³ Comments of PCIA – The Wireless Infrastructure Association, WC Docket No. 13-184 (filed Sept. 16, 2013) (“PCIA Comments”); Reply Comments of PCIA – The Wireless Infrastructure Association, WC Docket No. 13-184 (filed Nov. 8, 2013).

among other things, “how best to focus E-rate funds on high-capacity broadband, especially high-speed Wi-Fi and internal connection.” PCIA appreciates the opportunity reiterate its support for a “whole network” approach, technological neutrality, mobile learning and an E-rate priority for school districts in jurisdictions that encourage wireless siting and deployment.

II. DISCUSSION

PCIA supports a “whole network” approach to E-rate funding because it will provide the most flexibility to schools and libraries and best serves the Commission’s goals by maximizing efficiencies in both the speed of deployment of advanced indoor networks and the cost of deployment relative to performance.⁴ Under a whole networks approach, additional latitude is given to applicants to design and maintain their networks. As the Commission recognizes, comprehensive broadband service requires more than just delivering big pipes to a facility.⁵ Deployment of advanced indoor networks depends on internal connections to fully leverage the potential of next-generation teaching and learning tools. The Commission’s Public Notice rightly delves further into how E-rate can best support high-speed broadband access throughout school and library facilities. PCIA supports Commission efforts to target funds at “equipment and supporting software that is essential to getting high-capacity broadband from the building’s front door to the computer, tablet, or other learning devices in schools and libraries.”⁶

⁴ See *In re Modernizing the E-rate Program for Schools and Libraries, Notice of Proposed Rulemaking*, 28 FCC Rcd 11304, 11345 (2013) (citing *Funds for Learning, USF for Schools and Libraries: FY 2013 and Beyond*, CC Docket No. 02-6, at 4, 5 (filed Mar. 25, 2013)); see also e.g., *Comments of City of Boston*, WC Docket No. 13-184 at 5-6 (filed Sept. 16, 2013); *Comments of Cisco Systems, Inc.*, WC Docket No. 13-184 at 7-8 (filed Sept. 16, 2013); *Comments of Comcast Corporation*, WC Docket No. 13-184 at 5-6 (filed Sept. 16, 2013); PCIA Comments at 4-7.

⁵ Public Notice ¶¶ 8-10.

⁶ *Id.* ¶ 11.

However, some of the proposals in the Public Notice may not adequately address the funding necessary for schools and libraries to deploy advanced internal networks.⁷ Instead of reinforcing the current two-tiered priority system, the Commission should explore methods that give schools and libraries the freedom to design and maintain their own networks holistically.

For example, adopting a multi-year, cyclical process could undercut the purpose of the “whole network” approach. It would lock schools and libraries into a funding regiment that delays a school or library from addressing a critical bottleneck, slowing upgrades and improvements to its broadband network.⁸ The Commission should not establish a procedure where the beneficiaries of E-rate funding must wait an arbitrary period of time to become funding-eligible again. Rather, the Commission should develop a framework whereby the whole network is considered and where a systems administrator can target funds to address network-specific bottlenecks.

Along the same lines as adopting a “whole network” approach, the Commission should endeavor to make the E-rate program technology neutral so that applicants can best select the technological means best suited to address their connectivity issues. Be it for external connections, or in this case of this Public Notice, internal connections, locking schools and libraries into specific technologies will frustrate the Commission’s purposes by driving up costs and slowing the deployment of advanced broadband services. Rigid rules could stymie the adoption of new and innovative technologies. Further, favoring certain technologies over others could allow industries involved with a favored technology to exploit their position to charge higher prices to schools and libraries. PCIA cautions that a narrow list of services and equipment eligible for funding could lead to these detrimental effects. Schools and libraries should be free

⁷ Public Notice ¶¶ 14-15.

⁸ *Id.*

to adopt the technologies that will allow them to overcome geographical, topographical and other variables to deploy broadband services to their students and users quickly and efficiently. To that end, mobile services can play an important role in the education process both inside of schools and libraries and wherever students and teachers may go. The Commission should facilitate learning-on-the-go by making mobile broadband access eligible for E-rate support.

Finally, the Commission should take this opportunity to facilitate sound broadband infrastructure deployment policies. Ultimately, the internal connections that are the focus of this Public Notice rely on the deployment of robust infrastructure to provide last-mile, middle-mile, and backhaul connections. Therefore, the Commission should develop incentives in the context of the E-rate program to incent state and local governments to adopt written commitments or regulations that create a more streamlined permitting environment.⁹ In this way, the Commission will encourage all stakeholders to work together to improve broadband deployment in schools, libraries, and surrounding communities nationwide.

⁹ See PCIA Comments at 7-9.

III. CONCLUSION

For the foregoing reasons, PCIA urges the Commission to reform E-rate in a technology-neutral manner to support a “whole network” approach to funding, including support for internal networks. PCIA also urges the Commission to support the mobile classroom by incentivizing state and local governments to remove regulatory barriers that impede development of vital broadband infrastructure.

Respectfully submitted,

/s/ D. Zachary Champ

D. Zachary Champ
Government Affairs Counsel

Jonathan M. Campbell
Director, Government Affairs

D. Van Fleet Bloys
Government Affairs Counsel

PCIA – The Wireless Infrastructure
Association
500 Montgomery Street, Suite 500
Alexandria, VA 22314
(703) 739-0300

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