



April 15, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Notice of *Ex Parte* Communication, WC Docket No. 13-184

Dear Ms. Dortch:

On April 11, 2014, Mark Uncapher, Director of Regulatory and Government Affairs for Telecommunications Industry Association (“TIA”),¹ Gary Bolton, Vice President of Global Marketing at ADTRAN and Joel Thayer, legal intern at TIA, met with Jon Wilkins, Federal Communications Commission (the “Commission”) Managing Director and Michael Steffen from the Commission’s Wireline Competition Bureau to discuss the modernization of the E-Rate program for schools and libraries.

In the meeting, TIA expressed its support of the Commission’s three proposed goals for E-Rate reform. TIA encouraged the Commission to take a “Whole Network” funding approach when modernizing its E-rate program. TIA explained its concurrence with the “Whole Network” funding model, as described in Cisco’s comments, allowing for schools to place their own priorities on the service they receive.² As part of this “Whole Network” funding approach, TIA explained that the Commission should continue to provide sufficient support for basic maintenance of internal connections, including the industry-standard service contracts that enterprise customers purchase to ensure reliable networks and reduce the need for costly equipment replacement.

TIA encouraged the Commission to consider the density of devices and users when allocating funding through E-Rate. TIA explained that density of devices and users reflects a significant change from the environment at the outset of the E-Rate program. These bandwidth-intensive applications, including video, collaboration, and other software services may be resident on school networks or located in the cloud. However the intense demands on their internal networks

¹ TIA is a Washington, DC-based trade association and American National Standards Institute (ANSI)-accredited standard developer that represent the global information and communications technology (“ICT”) manufacturer, vendor, and supplier community. TIA represents approximately 500 participating companies producing products and services empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. See <http://tiaonline.org/>.

² See Comments of Cisco Systems, Inc. (“Cisco Comments”), WC Docket No. 13-184, at 6-8 (filed Sept. 16, 2013) at 6-8.

that these applications demand schools and libraries to have access to high-bandwidth networks both *into* the school and *within* the school.

TIA cautioned the Commission on the issues arising from pitting “Into Broadband Connections” against “Inside Broadband Connections” explaining that such measures may take the Commission away from its long standing Technology Neutral posture and risks “prioritization” weight that may not make sense over time. Additionally, TIA illuminated some of flaws with E-Rate’s current Priority 1/Priority 2 categories noting their reliance on obsolete distinctions creating unnecessary hurdles for schools and libraries seeking to deploy digital learning services.

TIA further encouraged the Commission to maximize the cost effectiveness of the E-Rate program by adopting a more efficient, meaningful matching requirement to improve cost effectiveness for participating schools and libraries. TIA suggested the Commission use per-student bandwidth target goals. TIA noted that, in a few short years, every school in America will require connections of at least 1 Gigabit per second, and larger schools will require speeds faster than that.³ TIA applauds the Commission’s proposal to phase out support for legacy services that are currently being subsidized, and encouraged the Commission to simplify the applications process and the guidance provided by the Commission on eligible services that will help schools and libraries to proceed with much-needed broadband modernization and expansion.

To further this goal of simplifying the applications process, TIA suggested that the Commission should more closely consider the benefits of existing procurement processes and, rather than attempting to reinvent entirely new procedures, allow E-Rate processes to be aligned with them. To simplify the Eligible Services List, the Commission should remove the regulatory classifications of telecommunications services and Internet access to allow applicants to seek eligible services from entities regardless of their regulatory labels.

At the end of the meeting, Gary Bolton engaged in a discussion of ADTRAN’s involvement with broadband development regarding E-Rate qualified institutions and highlighted areas where ADTRAN believes the E-Rate funding could be more efficiently allocated.

³ See Cisco Comments at 16, Cisco estimates that by 2014, all schools in America will need Internet access of 0.5 Gbps per 1,000 students (or 0.5 Mbps per student) and by 2018 increase that number four-fold, to 4 Gbps per 2,000 students (or 2 Mbps per student). In addition, in geographies in which last mile fiber infrastructure is already built, schools should double the goals to 2 Gbps per 2,000 students in 2014 and 8 Gbps per 2,000 students by 2018. See also Comments of ADTRAN, WC Docket No. 13-184, at 6-8 (filed Sept. 16, 2013) for a 1Mbps per student standard at page 12.

Pursuant to Section 1.1206 of the Commission's rules,⁴ this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Mark Uncapher

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⁴ See 47 C.F.R. § 1.1206.