



Before the Federal Communications Commission  
Washington, DC 20554

In the Matter of :  
: :  
Schools And Libraries Universal Service : CC Docket No. 02-6  
Support Mechanism :

**THE STATE E-RATE COORDINATORS ALLIANCE  
COMMENTS ON NOTICE OF PROPOSED RULEMAKING  
REGARDING COMMUNITY USE**

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The State E-rate Coordinators' Alliance (SECA) is pleased to submit these Initial Comments in response to the Federal Communications Commission (FCC or Commission) Order in which it proposed a rule to codify its temporary waiver that allows for community use of services supported by E-rate under certain circumstances.

By way of background regarding SECA, our members are immersed in E-rate day in and day out and have been steeped in E-rate since the beginning. SECA accomplishes its work through the resources of its members who provide statewide E-rate coordination activities in 48 states and 2 U.S. territories. Representatives of SECA typically have daily interactions with E-rate applicants to provide assistance concerning all aspects of the program. SECA provides face-to face E-Rate training for

applicants and service providers. As state E-rate coordinators, members serve as intermediaries between the applicant and service provider communities, the Administrator, and the Commission. SECA members typically provide more than 1300 hours of E-rate training workshops annually to E-rate applicants and service providers. In addition to the formal training hours, SECA members spend thousands of hours offering daily E-rate assistance to individual applicants through calls and e-mails. Further, several members of SECA work for and apply for E-rate on behalf of large, statewide networks and consortia that further Congress' and the FCC's goals of providing universal access to modern telecommunications services to schools and libraries across the nation.

In addition to their roles as State E-rate trainers and coordinators, most SECA members also provide the following services to the program: technology plan approval; applicant verification assistance to the Administrator's Program Integrity Assurance (PIA) Division; verification to the Administrator of applicable state laws confirming eligibility of certain applicant groups; contact of last resort to applicants by the Administrator; and verification point for free/reduced lunch numbers for applicants. Hence, SECA members are thoroughly familiar with E-Rate regulations, policies and outreach at virtually all levels of the program.

SECA supports the temporary waiver of section 54.504(b)(2)(v) and 54.504(c)(1)(vii) for FY2009 and FY2010. We appreciate the FCC's attention to comments submitted in CC Docket No. 02-6, National Broadband Plan Public Notice #15 and believe that this is a positive step forward in helping to achieve

connectivity in rural communities. We encourage the FCC to convert the waiver to a permanent rule. We believe that this waiver will promote broadband availability within our country and is a cost effective means of providing services to those who otherwise may not be able to afford this level of connectivity.

We support the conditions set forth regarding this use for the community. In particular, we support the FCC's guidance that states that schools are permitted but not mandated to open up their facilities for community use, and that schools may establish appropriate policies to allow for community access.

We encourage the FCC to clarify in its Order finalizing the rule that the school personnel who are permitted to use services that are supported by E-rate include not only employees, but also personnel who are contractors and engaged in educational activities at the direction of the school administration as well as volunteers officially sanctioned by the school administration who likewise are engaged in educational activities.

Respectfully Submitted by:

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