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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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In the Matter of )  
Schools and Libraries Universal Service ) CC Docket No. 02-6  
Support Mechanism )  
\_\_\_\_\_ )

**REPLY COMMENTS BY THE STATE E-RATE COORDINATORS' ALLIANCE  
ON NOTICE OF PROPOSED RULEMAKING REGARDING COMMUNITY USE  
(FCC 10-33)**

The State E-Rate Coordinators' Alliance (SECA) submits these Reply Comments in accordance with the FCC's Order and Notice of Proposed Rulemaking released February 19, 2010 (designated FCC 10-33).

In its initial comments on this rulemaking, SECA agreed with the Commission's proposal to permit community use of services supported by E-rate. Based on other comments received by the Commission, it is clear that this proposal has broad support by both schools and service providers.

Our one major concern with the initial comments is a suggestion by the Massachusetts Department of Telecommunications and Cable to: (a) require schools "...to notify the FCC of their public access hours of operation," and (b) allow the FCC "...to compile a list of such data to be made available to the public..."

SECA strongly believes that such a requirement would become a bureaucratic nightmare for both the schools and the Commission. While we agree that schools should — and will want to — keep their communities aware of their community usage hours, a requirement to provide this information through a federal process would be unduly burdensome. Further, since the proposed rules permit, rather than require, schools to open their facilities to their communities, such a reporting requirement would create disincentives for schools to do so.

Schools already have less formal, less expensive, more flexible, and more effective ways of communicating information such as this to their communities through school Web sites, local papers, school newsletters, and school community associations.

SECA urges the Commission not to establish rules requiring schools to notify the FCC of their public access hours of operation.

Respectfully Submitted by:

/s/ Gary Rawson

Gary Rawson, Chair  
State E-Rate Coordinators' Alliance

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