

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
Modifications to the California Advanced
Services Fund.

RULEMAKING 12-10-012

**COMMENTS OF THE TULARE COUNTY OFFICE OF EDUCATION
ON RULEMAKING 12-10-012 FOR ORDER INSTITUTING RULEMAKING TO
CONSIDER MODIFICATIONS TO THE CALIFORNIA ADVANCED SERVICE FUND**

The Tulare County Office of Education (TCOE) respectfully submits these comments in response to the Order Instituting Rulemaking 12-10-012 to Consider Modifications to the California Advanced Services Fund (CASF).

Introduction

California's population is diverse, therefore the solution to shortcomings in infrastructure necessary to serve California's population must be diverse.

If we are to overcome obstacles we must be creative and explore many solutions. The Internet itself is a testimony to creativity and innovation which have changed the way we live, and will continue to do so. If we are to provide ubiquitous access to these resources we must foster that creativity. Broadening the access to funds that bring infrastructure to areas which cannot be profitably reached without assistance is an absolute necessity.

It is also necessary that we consider the factors which will make Internet access economically feasible in the long term for those providing it. In many areas the use of the Internet is limited partly because the infrastructure isn't available and partly because potential users haven't been exposed to the multitude of resources available there. It is precisely this catch twenty-two

situation that is a struggle for the CPUC created consortiums.

In some areas providing the access to every home will never be enough. We must create the ecosystem from the ground up. In order to do this we must ensure the next generation has ubiquitous access to these resources where they will put them to use and make them part of their daily lives. We must ensure that not only adequate, but reliable and robust access is available in every school throughout California, not just those where it is affordable or can be supplied within the school's budget.

This investment does not have to be a drain on the CASF program. In fact, if managed carefully, making CASF funds available to support the infrastructure needs of schools would leverage those funds to make other funding available to further enhance our statewide infrastructure.

Discussion

Education in the United States is often taken for granted but access to education must not be trivialized. While the written word is still our primary source of education, books are no longer the first place we look to obtain knowledge. While the Internet has opened the knowledge of the world to everyone, only to those with adequate connectivity may access it.

As our country struggles to maintain its position in the global economy it is critical that access to education be assured. Digital resources are an integral element of education in the 21st century and assuring that there is adequate access to those resources is a serious challenge.

On March 17, 2012, California's State Superintendent of Public Instruction, Tom Torlakson, appointed 48 volunteers to become members of an Education Technology Task Force. Among the Task Force priorities published in August of 2012, are that every school in the state of California have adequate connectivity regardless of geographic challenges and "Every student in California will have guaranteed on-campus and home Internet access."

Not only should we make CASF funds available to non-traditional providers of broadband

services, which may include schools, we should consider the needs of the schools themselves and make their needs a part of CASF. By doing so we ensure that the foundations of digital literacy, access to adequate connectivity within the community, are created.

We ask that the Commission consider an additional benchmark which will be applied to schools and that is a minimum 100 meg connection to each school site and infrastructure which is capable of expanding to gigabit connectivity as the need arises. Gigabit and ten gigabit connections are already common in schools in urban areas of the state. The remaining schools should not suffer for lack of infrastructure. Much as a car carrying one individual down the highway must have the capability to obtain a safe speed to participate in traffic as a bus carrying a hundred, so must even our smallest schools have access to the same broadband speeds as those in urban areas if we are to ensure all have reliable and robust Internet connectivity necessary to pursue the goals of the 21st century classroom.

With the application of this benchmark we ask that the Commission allow CASF funds to become available to schools even in areas where adequate home connectivity is already available. If the infrastructure is already in place into those areas the cost to extend to schools will not be great and will not unduly burden the fund. If the infrastructure is not yet available its installation will strengthen the access to the community as it also supports the school. We urge the Commission to utilize the opportunity of legislative changes to broaden the CASF program so that true ubiquitous access to homes and schools becomes a reality.

The FCC E-Rate program has been a catalyst for state-of-the-art connectivity in schools across the country since its inception in 1996. While California gets an adequate share of the federal money, there remain areas which have little or no high speed infrastructure, where the costs are too high to provide infrastructure in a “cost effective” manner as described by the FCC in relation to E-Rate. Even when E-Rate monies become available, there may be no match money from the school’s general fund and consequently projects for necessary improvements to infrastructure may still not move forward. CASF funds may leverage FCC E-Rate funds, similar to how they were used with federal ARRA funding. The availability of an additional \$50,000 to

\$100,000 over and above that available from E-Rate may make all the difference in obtaining connectivity for a school.

Conclusion

If California is to maintain its position in the global economy we must invest in the infrastructure facilitating that growth. Our goal in California must be to end the digital divide, not just close it. Creativity and innovation are necessary as we pursue this goal. Making CASF funds available to alternative providers of connectivity, which may include schools and school service entities, is a definitive step in the right direction. Broadening the goals of the fund provides a means for federal monies to be more readily applied to ensure the long term success of the program.

Adequate connectivity into homes and schools is an absolute necessity and we urge the commission to support these goals equally as it seeks legislative action to modify the CASF program.

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Respectfully submitted,

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