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August 28, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Dear Secretary Dortch:


Western Governors appreciate the opportunity to comment on the Federal Communications Commission's (FCC) Notice of Proposed Rulemaking ([NPRM](#)), Modernizing the E-Rate Program for Schools and Libraries. The E-Rate program has been invaluable in supporting broadband deployment to schools and libraries across the West.

Since the FCC implemented the "category two" budget approach for E-Rate funds in 2014, rural schools and libraries across the West have been able to access substantially more funding for internal connectivity efforts. Western Governors are pleased with the results of the category two test period and urge the FCC to permanently adopt this funding model to support the crucial digital services provided by rural schools and libraries.


The NPRM also seeks comment on administrative aspects of accessing and managing category two E-Rate funds. Given that many small, rural communities in the West lack the local capacity to manage federal funds, Western Governors recommend the FCC seek ways to reduce the administrative burden associated with category two funds. Moving from a system focused on individual schools and libraries to districts and systems is one strategy to make category two funding more accessible for rural communities. Increasing the five-year budget floor of \$9,200 for small schools and libraries could also help encourage additional participation from rural western communities.

Western Governors appreciate the positive effects the E-Rate program has had in schools, libraries and communities across the West. Please regard us as a resource and invested partner as you consider and implement the NPRM.

Sincerely,



Doug Burgum  
Governor of North Dakota  
Chair, WGA



Kate Brown  
Governor of Oregon  
Vice Chair, WGA