



May 9, 2012

Federal Communications Commission  
Office of the Secretary  
Marlene H. Dortch  
445 12th Street, SW  
Washington, DC 20554

Subject: Petition for Rule Clarification Regarding Out-of-School Access to E-Rate Funded Facilities “Docket No. 02-6”

Dear Ms. Dortch:

The State Educational Technology Directors Association (SETDA), the principal association of U.S. state and territorial educational technology leaders, respectfully requests clarification on allowing students and teachers remote access to the school’s network and authenticated resources. A VPN (virtual private network) is the most likely tunnel from home, or similar off campus location, and should be counted as “educational purpose” under E-Rate rules. Please note that our petitioning for this rule clarification should not be construed to support the expansion of the E-Rate program to cover the cost of any such off-campus access or any mandates on schools that may not currently have a need for such services.

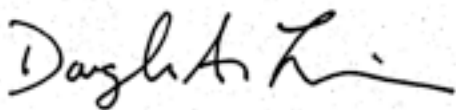
SETDA has a special interest in seeking the rule clarification, as our members provide E-Rate support and training to schools and are responsible for the implementation of state educational technology programs, including those that provide students and teachers with computers and other Internet access devices for educational purposes. Such a rule clarification would provide flexibility in implementing technology in schools, educational benefits to students, and new enterprise management capabilities, primarily by:

- **Providing the flexibility to allow students to access digital content, services, and school-related files hosted within the walled garden of a school network**, including digital textbooks and open educational resources (OER), in the evenings and over the weekend. Such a rule clarification would be put to immediate use in districts across several states, including for districts in which teachers assign homework that requires access to online resources and for districts interested in piloting and/or scaling up “flipped” classroom approaches that rely on out-of-school access to educational content.

- **Providing school network filtering on school-owned devices used outside of school.** While some states have addressed this issue via other mechanisms, other states and many school districts would benefit from the assurance that clarifying this rule would provide. Particularly for parents of younger students, it was felt that school managed filtering would be a benefit.
- **Enabling schools to leverage data and information on student use of online resources for education,** for instance, by providing a record of student preferences for educational resources and insights into individual student experiences with online educational content. Moreover, such access could increase the flexibility of schools interested in managing the security of school-owned devices should they be stolen.

We welcome the chance to offer further details and information on our members' views. Please do not hesitate to contact me with any questions. I can be reached at [dlevin@setda.org](mailto:dlevin@setda.org) or at 202-715-6636 x700.

Sincerely,

A handwritten signature in black ink that reads "Douglas A. Levin". The signature is written in a cursive style with a long horizontal stroke at the end.

Douglas A. Levin  
Executive Director