



January 25, 2021

Submitted via www.fcc.gov/ecfs/

Marlene H. Dortch
Federal Communications Commission
45 L St, NE
Washington, DC 20554

Re: WC Docket No. 20-445; Wireline Competition Bureau Seeks Comment on Emergency Broadband Connectivity Fund Assistance

Dear Ms. Dortch,

The Aurora Institute respectfully submits the following comments in response to the Federal Communications Commission's (Commission) Public Notice to implement the Emergency Broadband Benefits Program (EBBP) authorized by the federal Consolidated Appropriations Act of 2021.¹ We greatly appreciate the opportunity to provide public comments and applaud the Commission's commitment to seek diverse input from the public to expand access to high-quality broadband services.

For background, the Aurora Institute is a non-profit research, policy, and advocacy organization that seeks to transform education systems and accelerate the advancement of breakthrough policies and practices to ensure high-quality learning for all. We envision a world where all students are empowered to attain the knowledge, skills, and dispositions necessary to achieve success, contribute to their communities and advance society. To fully implement student-centered policies and meet the mission of the Aurora Institute, this nation must make substantial progress to close the digital divide and increase high-quality learning opportunities for each student, but especially for historically underserved young people such as students of color, low-income students, students with disabilities, and students experiencing homelessness.

The Aurora Institute has provided guidance on three sections from the EBBP public notice to help the Commission better meet the digital needs of students living in low-income households.

Household and Student Eligibility

A household with a student or young adult that participates in the Free and Reduced-Price Lunch (FRPL) program, the school breakfast program, or is the recipient of a Pell grant award is eligible for the

¹ Broadband Internet Access Service, in the Consolidated Appropriations Act establishes an Emergency Broadband Connectivity Fund of \$3.2 billion and directs the Federal Communications Commission (Commission) to use that fund to establish an Emergency Broadband Benefit Program, under which eligible households may receive a discount off the cost of broadband service and certain connected devices during an emergency period relating to the COVID-19 pandemic, and participating providers can receive a reimbursement for such discounts.



Emergency Broadband Benefit Program. This is a tremendous start that will serve an overwhelming connectivity need. Data presented by the Alliance for Excellent Education show 17 million K-12 students do not have access to the internet at home.² Black, Latinx, rural, and low-income students, in particular, are significantly more likely to lack access to high-speed internet and learning devices than wealthier white students in urban or metropolitan areas. For example, data on digital disparities reveal that nearly 20 percent of African American children ages 3-18 and 21 percent of families earning less than \$40,000 per year have no access to the internet at home.³ 14 percent of rural families do not have at least one computer in the home versus 9 percent of families living in metropolitan areas.⁴

As stated in the public notice, the Commission seeks comments on, “how households with students in these Community Eligibility Provision schools should be considered eligible households for the Emergency Broadband Benefit Program.” As you know, the USDA Community Eligibility Provision allows the nation’s highest poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without collecting household applications, thereby effectively qualifying an entire school or school district for nutrition assistance programs. Currently 85 percent of schools who enroll 60 percent or more students living in poverty use the Community Eligibility to feed students in their school.⁵ It is arguably a more accurate tool to gauge poverty and serve the nutritional needs of low-income students even though some families do not fill out the paperwork who are eligible for FRPL. As such, the Aurora Institute recommends:

- all households with a student attending a school with a poverty rate above 50 percent or who uses Community Eligibility should be eligible for the EBBP. Low-income families have a disproportionate burden maintaining connectivity for remote instruction, for a higher portion of their salaries pay for internet service that is critical for digital learning. The Commission has a legal duty and moral obligation to support the delivery of public education constitutionally mandated by states. Given the glaring remote learning needs of low-income students, especially in the middle of a global pandemic where many students are forced to learn at home, we encourage the Commission to make it easier for families and students to receive discounts on broadband coverage and device attainment. Excluding low-income students from the benefits of this program simply because they attend a school who uses Community Eligibility and does not

² Alliance for Excellent Education. (2020). *Students of Color Caught in the Homework Gap*. Retrieved from <https://futuresready.org/homework-gap/> (accessed 01/25/21).

³ National Center for Education Statistics. (2019). *Figure 4. Percentage of children ages 3 to 18 with no internet access at home, by selected child and family characteristics: 2010 and 2017*. Retrieved from https://nces.ed.gov/programs/coe/indicator_cch.asp (accessed 01/20/21).

⁴ Alliance for Excellent Education. (2020). *Students of Color Caught in the Homework Gap*. Retrieved from <https://futuresready.org/homework-gap/> (accessed 01/25/21).

⁵ FitzSimons, C., Maurice, A., & Osbourne, M. Community Eligibility: The Key to Hunger-Free Schools School Year 2019-2020. Food Research & Action Center <https://frac.org/wp-content/uploads/CEP-Report-2020.pdf> (accessed 01/25/21).



require completion of the FRPL application harms the neediest populations. As is, the Commission would exacerbate the digital divide between higher and lower income families; and

- the Commission determine the overall cost to provide free broadband coverage to all homes with a student eligible for FRLP and ask Congress to fund this emergency program at the level necessary to connect all students living in low-income households to expand remote learning.

Minimum Software and Broadband Requirements

For households that are able to access the internet, many still cannot do so at adequate or reliable levels. According to the Pew Research Center, “15% of U.S. households with school-age children do not have access to high-speed internet connection at home.”⁶ Almost 20 percent of teenagers report they often do not complete homework assignments because they do not have reliable access to the internet.⁷ The digital divide, including the quality of connectivity, ties directly to student academic performance. For instance, a report published by Michigan State University and the Quello Center shows students who do not have access to high-speed internet at home perform worse on standardized tests, such as the SATs, and earn lower overall grades.⁸ It’s imperative that the EBBP supports homes with gaining access to high-quality broadband and functioning devices with the capability to handle all components of remote instruction. To increase academic performance and student engagement, the Aurora Institute urges the Commission to impose minimum system requirements for connected devices and qualified internet service providers (ISPs) eligible for funds through the emergency fund. At the very least, we recommend setting minimum requirements based on industry standard best practices for distance learning:

- All funded devices should support video conferencing and school district selected digital learning software;
- All eligible ISPs should be required to offer enough broadband support so multiple family members can stream classes at the same time;
- All eligible ISPs should be required to offer a minimum of 5 Mbps upload and download speed for participating households; and

Marketing & Community Engagement

The Aurora Institute appreciates the Commission’s willingness to gather input on how best to market the EBBP. Many Americans, including those who will benefit the most from the EBBP, are reeling from the financial impacts of COVID-19. It will take, however, strategic marketing, outreach, and partnerships with trusted community entities to effectively communicate the benefits of the EBBP to low-income households. Authentic outreach and marketing will yield additional digital literacy, household participation, consumer satisfaction, and quality of service with future beneficiaries. We recommend the following marketing requirements for participating ISPs:

⁶ Pew Research Center. (2018). *Nearly one-in-five teens can’t always finish their homework because of the digital divide*. Retrieved from <https://pewrsr.ch/2JirZar> (accessed 01/25/21)

⁷ Ibid

⁸ Hampton, K. N., Fernandez, L., Robertson, C. T., & Bauer, J. M. Broadband and Student Performance Gaps. James H. and Mary B. Quello Center, Michigan State University. <https://doi.org/10.25335/BZGY-3V91>



- Partner with civil rights and faith-based organizations as well as community centers to market the benefits of the EBBP;
- Require participating providers to publicize the EBBP's benefits through flyers, electronic notices, social media, at schools, and in bill statements; and
- Advertise widely and aggressively these services through the U.S. mail for families with no phones, at school pick up sites, and through phone calls and emails, and ensure materials are translated and accessible for non-English speakers and people with disabilities.

Conclusion

Access to the internet levels the playing field. It helps support student access to a high-quality, world-class education that prepares each student for a lifetime of success. An effective emergency broadband fund is crucial to increasing access to broadband and decreasing the digital divide so that students can reap the benefits of high-quality remote learning. It is our hope that through the adoption of our recommendations along with the deliberate attention to providing households with much-needed economic relief, the country will recover from the pandemic better prepared to support each student with their constitutionally-guaranteed, equitable, and student-centered education.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Patrick".

Susan D. Patrick
President & CEO
Aurora Institute
Vienna, VA 22182