February 16, 2021

Submitted via: http://www.fcc.gov/ecfs
Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
45 L St, NE
Washington, DC 20554

Re: WC Docket No. 21-31; Wireline Competition Bureau Seeks Comment on Petitions for Emergency Relief to Allow the Use of E-Rate Funds to Support Remote Learning During the COVID-19 Pandemic

The Aurora Institute respectfully submits the following comments in response to the Wireline Competition Bureau's public request to receive input to expand E-Rate funds' use to support remote learning. We appreciate the opportunity to provide public comments and applaud the Federal Communications Commission's (FCC) commitment to seek diverse input to expand access to remote learning opportunities for students across this country.

Background on the Aurora Institute (formerly iNACOL)
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, this nation must make substantial progress to close the digital divide and increase high-quality learning opportunities for each and every child, but especially for historically underserved and unconnected students such as those living in low-income households and rural locations and of African descent and Indigenous people.

Background on the E-Rate program
Fundamentally, the E-Rate program subsidizes internet costs so students and community members can more easily access the internet at schools and libraries. The FCC issued long-awaited modernization orders for E-Rate in 2014, such as expanding funding for higher quality in-school Wi-Fi to increase the reach and utility of the internet throughout the school. E-Rate is a relatively successful program that has connected most schools to high-quality internet connections and funded internal Wi-Fi networks to expand broadband to students and educators. To keep pace with the accelerating demand for connectivity and adequate bandwidth

as schools transition to remote learning, the FCC has a moral, legal, and ethical responsibility for continued support and commitment to increase funding for the E-Rate program and expand its access for at-home use.

The Aurora Institute has provided guidance and policy considerations on three sections from the public notice to help the Wireless Competition Bureau better meet students' connectivity needs across the nation.

Eligible Equipment and Services
"Do other commenters agree that E-Rate funds should be used for wireless hotspot devices and fixed or mobile wireless towers that are needed to support remote learning?"[1]

We unequivocally agree that wireless hotspot devices should be eligible for purchase through the E-Rate program. As of 2020, data presented by the Alliance for Excellent Education show up to 17 million K-12 students do not have access to high-quality internet at home.[2] In 2018, the National Center for Education Statistics reported six percent of children all across the nation did not have access to the internet.[3] Many states and districts, however, have used hotspots to dramatically or completely eliminate the digital divide. For example, Nevada recently confirmed that after the launch of Connecting Kids, a statewide public/private partnership, all of its K-12 students are now connected to the internet. A cornerstone to this achievement was the acquisition and use of 18,000 hotspots.[4] Additionally, just this past spring, Texas procured 500,000 hotspots with CARES Act dollars, Colorado secured hotspots for 34,000 families, and

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[1] Eligible Equipment and Services and their Costs. We seek comment on the specific equipment and services that E-Rate should support to fund off-campus access to broadband services for students, staff and patrons who lack adequate home Internet access. For example, the SHLB Petition requests E-Rate support for wired or wireless network equipment and services necessary for remote learning, including, but not limited to, wireless hotspot devices and fixed or mobile wireless towers. Do other commenters agree that these services and equipment are needed to support remote learning? Are there other or different services or equipment that are needed to support remote learning? For example, should modems, routers, devices that combine a modem and router, or connected devices be eligible?

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

[3] National Center for Education Statistics. (2020). Figure 1. Percentage of 3- to 18-year-olds who had home internet access, by child's race/ethnicity: 2018. Retrieved from http://nces.ed.gov/programs/coe/indicator (accessed 02/15/21).

[4] District Administration. (2020) *Nevada has achieved internet, devices for all students.* Retrieved from https://districtadministration.com/nevada-has-achieved-internet-devices-for-all-students/ (accessed 02/15/21)

North Carolina sent 100,000 hotspots to students in need of internet access due to the universal transition to remote learning because of the impact of COVID-19.[5]

Though states and districts filled in the gap with emergency federal resources and other one-time efforts, unfortunately, these examples represent temporary remote learning solutions. Districts and states need long-term and adequate funding, such as those that allow them to secure and distribute hotspot devices to meet the digital learning needs students face at home.

Recommendation
- Allow E-Rate funding to be used to purchase and distribute hotspot devices and other equipment such as modems, routers, and devices that combine a modem and router that expand access to the internet at home for educational purposes.

Cost-effective purchases
"How can the Commission ensure that applicants are making cost-effective purchases? What steps have schools and libraries that are currently providing off-premises broadband services to students, staff, and patrons taken to ensure that they are making cost-effective purchases?"

One effective method to decrease overall cost is to allow small school districts to benefit from statewide negotiated contracts. As you are well aware, statewide contracts are negotiated to provide cost-effective products and services for the benefit of both state and local government entities. In many instances, state chief information officers and statewide general service contracts for telecommunications and technology have already negotiated the pricing and solicited required competitive quotes, selected the appropriate vendors, and outlined the services the vendors perform relative to the contract to bring the best value and prices to the contracts. By using negotiated statewide contracts, local governments do not need to invest valuable time developing solicitations, issuing bids, evaluating responses, and executing contracts.

Fundamentally, statewide contracts save money and lower costs by leveraging the state's aggregate purchasing power and economies of scale (from all agencies, i.e., general services administration, school districts, law enforcement agencies, as well as lottery) by driving down costs and ensuring favorable contract terms and conditions for procuring products and services

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[5] Ali, T., Chandra, S., Cherukumilli, S., Fazlullah, A., Galicia, E., Hill, H., McAlpine, N., McBride, L., Vaduganathan, N., Weiss, D., Wu, M. (2021). Looking back, looking forward: What it will take to permanently close the K–12 digital divide. San Francisco, CA: Common Sense Media.

including technology and telecommunications. Local governments should not only be aware of current and previous statewide pricing structures rates for goods and services to expand broadband, but they also should receive similar rates states have already negotiated.

Recommendation
- Encourage and allow small local school districts that do not have individual strong purchasing power to benefit from statewide education technology negotiated contracts such as state master contracts or state buying consortiums.

Funding and Prioritization
"In the event that demand exceeds available funding, how should the off-campus requests be prioritized? How can the Commission ensure that available funds are efficiently targeted and focused on the needs of rural students; Native American, African American and LatinX students; students with disabilities; and other populations of students that are disproportionately affected by the Homework Gap or are more expensive or difficult to reach? How can the Commission prioritize limited E-Rate support to those students, staff, or patrons that still do not have adequate home Internet access to fully engage in remote learning?"

COVID-19 has completely upended how the traditional school systems deliver instruction. At the onset of the pandemic, some districts quickly transitioned to remote learning while others struggled to meet the overwhelming needs of their student population despite the infusion of resources provided by the CARES Act. Black, Latinx, Native American, 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.[6] 14 percent of rural families do not have at least one computer in the home versus 9 percent of families living in metropolitan areas.[7] The U.S. Census Bureau American Community Survey 2013-2017 reported that only 53% of Native Americans living on tribal lands have access to high-speed internet.[8]

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[6] 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).

[7] Alliance for Excellent Education. (2020). *Students of Color Caught in the Homework Gap.* Retrieved from https://futureready.org/homework-gap/ (accessed 01/25/21).

[8] U.S. Census. (2018). *For the First Time, Census Bureau Data Show Impact of Geography, Income on Broadband Internet Access.* Retrieved from https://www.census.gov/library/stories/2018/12/rural-and-lower-income-counties-lag-nation-internet-subscription.html (accessed 02/15/21).

Each corner of the country contains some form of digital inequity, though gaps and access to broadband are not equally applied. New data shows that half of the K-12 students in Mississippi do not have reliable internet at home compared to just 20 percent of their peers in New Hampshire.[9] In today's modern era, access to the internet at home helps support student access to a high-quality, world-class education. We believe the E-Rate program can play a pivotal role in closing the digital divide by addressing the glaring socio-economic, regional, and racial digital opportunity gaps by implementing the following recommendations.

Recommendations
- Create a third category under the E-Rate program to fully subsidize the cost of broadband at home for students who attend schools that enroll a majority of rural students, low-income students, students with disabilities, or other populations of students that are disproportionately affected by the Homework Gap.
  - This third category should also subsidize broadband costs for homes with at least one student attending a school identified for Comprehensive Support and Improvement by state educational agencies.
- Establish a 1-to-1 program through E-Rate to cover the cost to purchase devices.
- Expand the list of eligible services to include Wi-Fi on school buses.
- Permit non-instructional facilities to receive Category Two Funding.
- Publish an annual report that examines how much funding is needed for E-Rate to keep pace with the accelerating demand for high-speed broadband connectivity at school and in homes and ensures equitable access to a variety of high-quality learning pathways for all students.
- Produce a set of best practices for reducing deployment costs and times.
- Invest in a federal research and development agenda focused on advancing new models of technology-empowered teaching and learning that promote equity and improve outcomes for all students.
- Improve data collection that shows the actual need for every student in this country to receive access to the internet at home.

Conclusion
Solving the Homework Gap exposed by COVID-19 will reflect our country's commitment to equity and supporting a prosperous economy. The United States has between 15 - 17 million students, most of whom are low-income and/or living in rural areas, without access to the internet at

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[9] Chandra, S., Chang, A., Day, L., Fazlullah, A., Liu, J., McBride, L., Mudalige, T., Weiss, D., (2020). Closing the K–12 Digital Divide in the Age of Distance Learning. San Francisco, CA: Common Sense Media. Boston, Massachusetts, Boston Consulting Group.

home. Students are not able to access coursework, receive instruction, or consistently communicate with peers, exacerbating the loss of instructional time due to the devastating impact of the pandemic forcing students to learn at home. Many current state and local efforts to close the digital divide will end as federal stimulus aid dries up. Funding E-Rate at the level necessary to meet its current demand and targeting support for in-home assistance to those most in need can directly address the country's digital divide. We implore the FCC to expand the E-Rate program so that students can attain their constitutionally-guaranteed, equitable, and student-centered education.

Again, the Aurora Institute thanks you for the opportunity to submit comments.

Sincerely,

Susan D. Patrick
President & CEO
Aurora Institute