# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of	)		
	)		
Modernization of the E-Rate	)	WC Docket No.	13-184
Program for Schools and Libraries	)		

REPLY COMMENTS IN THE FORM OF A LETTER FROM 54 ORGANIZATIONS REQUESTING THAT THE FEDERAL COMMUNICATIONS COMMISSION SUPPORT HIGH-SPEED BROADBAND AND WI-FI THROUGH E-RATE CATEGORY TWO SERVICES. RESPECTFULLY SUBMITTED BY THE ALLIANCE FOR EXCELLENT EDUCATION ON BEHALF OF THE SIGNATORIES

November 7, 2017

Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: WC Docket No. 13-184

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, and Commissioner Rosenworcel:

We, the undersigned organizations, appreciate the opportunity to respond to the Public Notice posted on September 22, 2017, which requests comments on the sufficiency of budgets for category two services under the Federal Communications Commission's (the FCC's) E-rate program. The undersigned organizations constitute a broad array of stakeholders who support maintaining the commitment made by the FCC's E-rate Modernization Orders (the Orders), which set a target of providing \$1 billion annually for five years to support category two services. Many of the undersigned organizations filed comments in response to the Public Notice and have expressed different points of views and ideas on the administration of category two budgets, yet we are united in support for preserving and continuing the commitment to category two funding beyond the currently effective five-year period.

In the hundreds of comments filed in response to the Public Notice, states, school districts, and libraries provided examples of how category two funding modernized their networks to provide high-speed broadband access in schools and libraries. They also voiced support for continuing category two funding through 2019 as promised.

Moreover, the data that is available on the implementation of the Orders supports the comments filed thus far. One analysis finds that in 2015, the first year after the Orders were adopted, \$1 billion in E-rate funds was disbursed to support Wi-Fi infrastructure and services in more than 42,700 schools. This is important because in the two years prior to the adoption of the Orders, no E-rate funds were disbursed to support Wi-Fi. Another analysis finds that schools and libraries requested more than \$3 billion in category two funding in the first three years of implementation of the Orders, showing that demand for these services falls in line with the \$1 billion per year the FCC budgeted for the program.

The results of these investments are having real impact on the nation's students. Since 2013, the year before the Orders were adopted, an additional 35.2 million students have gained internet access that meets the Orders' goal of 100 kbps per student and 88 percent of schools report having sufficient Wi-Fi in their classrooms.<sup>3</sup> This progress must not be undercut. There is still work to be done to ensure that *all* students attend a school with high-speed internet access. For example, 6.5 million students still lack access to high-speed broadband for digital learning and 10,000 schools report having insufficient Wi-Fi in their classrooms.<sup>4</sup>

In today's modern economy, it is critical that the nation's schools and libraries have robust Wi-Fi to support digital learning for students and library patrons alike. High-speed broadband enables

students across the country to engage in courses and learning opportunities that were not previously available in brick-and-mortar classrooms; allows educators to take advantage of online and digital resources and tools to transform teaching and learning; and helps librarians provide students with after-school homework access and adult education and workforce development opportunities for their communities.

Therefore, the undersigned organizations jointly urge the FCC to maintain the commitment made by the Orders to provide at least \$1 billion annually to support category two services. Thank you for your consideration.

#### Sincerely,

Albemarle County Public Schools (VA)

Alliance for Excellent Education

APEX Academy (CA)

Arlington ISD (TX)

Association for Middle Level Education

Benton Foundation

Bedford County Public Schools (VA)

Berea City School District (OH)

CA Educational Technology Professionals Association (CETPA)

CenterPoint Education Solutions

Clayton Christensen Institute

Common Sense Kids Action

CommunityShare

CoSN

Diocese of Orange (CA)

East Washington School Corporation (IN)

Edina Public Schools, ISD 273 (MN)

Education SuperHighway

Funds for Learning®

Garrett-Keyser-Butler CSD (IN)

Gigabit Libraries Network

Growth Public Schools (CA)

Henry County Public Schools (VA)

iLearn Collaborative

**iNACOL** 

Indiana Online Academy

Inspired Impact, LLC

Lauréate Education

Lenoir City Schools (TN)

Level Up Academy (MN)

MasteryTrack

McComb School District (MS)

Michigan Virtual

Montgomery County Intermediate Unit (PA)

National Association of State Boards of Education

National Digital Inclusion Alliance

National Rural Education Association

National Writing Project

Parents for Public Schools, Inc.

Partnership for 21st Century Learning

Red Bank Elementary School (SC)

RSU 2 (ME)

**SHLB** Coalition

Silverback Learning Solutions

Summit Elementary (MS)

Taos Academy Charter School (NM)

The Learning Accelerator

Urban Libraries Council

Valley School District (WA)

Weatherford ISD (TX)

Westminster Public Schools (CO)

WiscNet

Wisconsin Virtual School

Young Adult Library Services Association

<sup>&</sup>lt;sup>1</sup> Alliance for Excellent Education and Funds for Learning<sup>®</sup>, *E-Rate Support for Wi-Fi By State, 2015*, https://all4ed.org/erate-wifi-state-data/ (accessed October 26, 2017).

<sup>&</sup>lt;sup>2</sup> J. Harrington, *Demand Drops to \$3 Billion* (Funds for Learning<sup>®</sup>, May 19, 2017), https://www.fundsforlearning.com/blog/2017/05/demand-drops-to-\$3-billion.

<sup>&</sup>lt;sup>3</sup> This is compared to 25 percent of schools reporting having sufficient Wi-Fi in their classrooms in 2013. EducationSuperHighway, 2017 State of the States: Fulfilling Our Promise to America's Students, <a href="http://stateofthestates.educationsuperhighway.org/">http://stateofthestates.educationsuperhighway.org/</a> (accessed October 27, 2017), p. 6.

<sup>&</sup>lt;sup>4</sup> Ibid., p. 9.