

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Universal Service Contribution Methodology) WC Docket No. 06-122

**REPLY COMMENTS FROM SCHOOL BOARDS ASSOCIATIONS OPPOSING THE
NOTICE OF PROPOSED RULEMAKING TO PLACE A CAP ON THE UNIVERSAL
SERVICE FUND AND A SUB-CAP ON THE E-RATE AND RURAL HEALTH CARE
PROGRAMS AND INSTEAD TO WORK WITH SCHOOL BOARDS AND FOCUS ON
CLOSING THE DIGITAL DIVIDE IN EDUCATION**

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Reply Comments in the Form of a Letter

Dear Chairman Pai, Commissioner O’Rielly, Commissioner Carr, Commissioner Rosenworcel, and Commissioner Starks:

We, the undersigned, represent school board members across the nation who work diligently to give each student an excellent education that will prepare them for future success. There are more than 14,000 school districts and 90,000 school board members who spend each day striving to meet that goal. On behalf of those school board members and the many millions of students who attend public schools, we urge the Federal Communications Commission (Commission) to reject the proposal in the recently published Notice of Proposed Rulemaking (NPRM) to place a cap on the Universal Service Fund (USF) and a sub-cap on the Schools and Libraries (E-Rate) and Rural Health Care Programs.¹ Instead, we respectfully request that the Commission join with the nation’s school board members to focus on expanding access to high-speed broadband so students have enhanced access in and out of school.

E-Rate is a vital program that aids schools and libraries to connect to high-speed broadband so that students have access to the Internet and the digital tools and adaptive technology essential for successful learning in today’s modern world. Thousands of schools are now connected to high-speed broadband thanks to the Commission’s modernization and expansion of E-Rate in 2014. Unfortunately, the proposed rule being considered by the Commission could harm that success at a time we should be expanding universal access.

¹ Federal Communications Commission, Note of Proposed Rule Making re Universal Service Fund Contribution Methodology, FCC 19-46; WC Docket No. 06-122, Federal Register p. 27570, June 13, 2019. Accessed July 28, 2019.

Placing an overall cap on the USF will lead to burdensome competition among the USF programs and violates the intent of Congress to create four separate programs. Moreover, since the four programs, including E-Rate, have their own budgets and caps, this rule is unnecessary. Further, enactment of the rule will create uncertainty for school boards and districts across the nation when engaging in their yearly budgeting process which jeopardizes connectivity and learning for students.

While we encourage rejection of this rule, we urge the Commission to proactively pursue steps that address the digital divide in education. The lack of access to high-speed broadband remains one of the major obstacles standing in the way of a high-quality education for many students. The Institute of Education Sciences (IES) released a report in 2018 that found major gaps exist in Internet access for many students, particularly those who live in remote rural areas, when they leave school and go home. The IES report noted that the gaps vary depending on the students racial and ethnic background, economic status, and by where they live.² Therefore, access at schools and libraries through E-Rate is crucial for those students and must remain a reliable resource for schools and libraries while further actions must be made to get those same students connectivity when they are home so that they have an equal opportunity to be successful.

We thank the Commission for all the contributions it has undertaken to help improve learning over the years and urge it to follow our recommendations in this letter. Doing so will lead to improved connectivity and an excellent public education for all students.

Sincerely,

National School Boards Association
Alabama Association of School Boards
Association of Alaska School Boards
Arizona School Boards Association
Arkansas School Boards Association
California School Boards Association
Colorado Association of School Boards
Connecticut Association of Boards of Education
Delaware School Boards Association
Florida School Boards Association
Georgia School Boards Association
Idaho School Boards Association
Illinois Association of School Boards
Indiana School Boards Association
Iowa Association of School Boards
Kansas Association of School Boards
Kentucky School Boards Association
Louisiana School Boards Association
Maine School Boards Association

² Student Access to Digital Learning Resources Outside of the Classroom, National Center for Education Statistics, Institute for Education Sciences, April 2018, <https://nces.ed.gov/pubs2017/2017098/index.asp>. Accessed July 29, 2019.

Maryland Association of Boards of Education
Massachusetts Association of School Committees
Michigan Association of School Boards
Minnesota School Boards Association
Mississippi School Boards Association
Missouri School Boards Association
Montana School Boards Association
Nebraska Association of School Boards
Nevada Association of School Boards
New Hampshire School Boards Association
New Jersey School Boards Association
New Mexico School Boards Association
New York State School Boards Association
North Carolina School Boards Association
North Dakota School Boards Association
Ohio School Boards Association
Oklahoma State School Boards Association
Oregon School Boards Association
Pennsylvania School Boards Association
Rhode Island Association of School Committees
South Carolina School Boards Association
Associated School Boards of South Dakota
Tennessee School Boards Association
Texas Association of School Boards
Utah School Boards Association
Vermont School Boards Association
Virginia School Boards Association
Washington State School Directors' Association
West Virginia School Board Association
Wisconsin Association of School Boards
Wyoming School Boards Association