

June 13, 2019

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

Re: Request for Extended Comment Period for Notice of Proposed Rulemaking on Establishing a Cap for the Universal Service Fund (WC Docket No. 06-122)

Dear Chairman Pai:

The Education and Library Networks Coalition (EdLiNC), which represents the public and private school as well as the public library beneficiaries of the universal service schools and library program (known as the E-Rate), respectfully request that the Commission extend the comment period for the above-captioned matter on the grounds that the vast majority of public and private school educators, parents and students will be unable to provide their comments during the period that this matter is open for public comment. We recommend that the Commission extend the comment period for this matter until at least the end of September 2019 to provide ample time for the Commission to hear the opinions of a major constituency of the E-Rate program.

As you know, the comment period for this matter opened on June 13th and is scheduled to close on August 12th. This period coincides almost exactly with the summer recess for most K-12 public and private schools across the country, meaning that most teachers and many school administrators will not be working in their classrooms and offices during this period. Additionally, summer is obviously a time when most students and their families go on extended vacations. Finally, from early August until early September, K-12 educators are consumed with preparing and opening their schools for the upcoming school year, making that period a difficult time for educators to respond to this rulemaking. Therefore, we believe few if any of the actual school beneficiaries of the E-Rate program will be aware of this significant rulemaking let alone available to file comments on its proposals during the currently scheduled comment period.

For the K-12 education and public library community, the E-Rate program has proven to be an invaluable resource since its launch in 1998. Virtually every facet of the school enterprise – from attendance, to homework, to college research, to online professional development, to assessments – relies upon connectivity. Indeed, the demands for additional bandwidth escalate with each passing year, demonstrating how the need for E-Rate continues. According to EducationSuperhighway's 2018 State of the State Report, between 2013 and 2018 more than 40 million students gained access to high-speed Internet access as their schools upgraded their networks to meet E-Rate's interim bandwidth goal of 100 Mbps per 1000 students. Schools are continuing to upgrade their networks in order to meet the longer-term benchmark of 1 Gbps per 1000 students.

Thus, when the Commission commences a major rulemaking that might significantly alter the E-Rate, the E-Rate's beneficiaries wish to have their voices heard. Indeed, the Commission should want to hear from the beneficiaries themselves as they are best positioned to provide the feedback on what the proposed changes would mean to the program and how those changes would impact, undermine or bolster the program's stated purpose. In a number of E-Rate-related rulemakings over the past five

years, most particularly the E-Rate Modernization Orders of 2014, individual teachers, administrators and librarians filed hundreds of substantive comments on the many different proposals that the Commission was considering. In fact, the Commission cited several filings by individuals in its resulting orders. In sum, we believe it is in the Commission's best interest, if they endeavor for a fair and informed rule making, to provide a comment timeline that ensures—rather than prohibits—meaningful beneficiary responses.

Given the unfortunate timing of the scheduled comment period for this matter, we fear that most school E-Rate beneficiaries will not be able to inform the Commission's decisions on creating an overall universal service cap and possibly combining E-Rate and the Rural Health Care program under a single cap. We believe that opening and closing comments on a significant E-Rate matter when school is – literally – out for summer undermines the public nature of this proceeding, doing a disservice to E-Rate's beneficiaries as well as the Commission itself. Therefore, we urge you to extend this comment period until at least the end of September 2019 in order to open this matter to an appropriate level of input from the people who rely on the E-Rate and who will be most affected by any significant change to its structure and rules.

Sincerely,

AASA: The School Superintendents' Association
American Federation of Teachers
American Library Association
ASBO International
Association of Education Service Agencies
Association of Latino Administrators and Superintendents
Consortium for School Networking
Council of Chief State School Officers
International Society for Technology in Education
National Association of Elementary School Principals
National Association of Independent Schools
National Association of Secondary School Principals
National Catholic Educational Association
National Education Association
National PTA
National Rural Education Advocacy Consortium
National Rural Education Association
National School Boards Association
State Educational Technology Directors Association
United States Conference of Catholic Bishops

cc. Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks