

March 20, 2020

Chairman Ajit Pai
Commissioner Mike O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Pai and Commissioners:

The State Educational Technology Directors Association (SETDA) represents state education agency technology leaders from across the United States. Our members work closely with school district and school leaders to ensure that teachers, students, and communities benefit from digital learning materials and other useful educational tools. Under normal circumstances, technology facilitates meaningful communication between schools and families, equips students, teachers and school leaders with useful data, and creates exciting and engaging instructional opportunities by connecting learners with a wide array of resources, including rich open educational resources. During this historic national emergency, digital learning and universal student and teacher broadband access are more important than ever before.

SETDA’s members appreciate the Commission’s swift decisions to: (1) extend the E-rate application filing deadline for 2019 and 2020; and (2) grant a temporary waiver of the E-rate gift rules. These steps will make a meaningful difference for the field by freeing state and local leaders to focus all of their immediate attention on connecting students to learning opportunities and by permitting E-rate participants to collaborate effectively with companies and other entities who can help provide students with emergency broadband access. In addition to these important steps, we urge the Commission to adopt the recommendations submitted by the Schools, Health & Libraries Broadband (SHLB) Coalition (SHLB Letter of March 17, 2020). Our members strongly support all of SHLB’s recommendations, including the following vitally important steps:

- Clarifying that schools may allow their Wi-Fi networks to be used by the community without losing E-rate funding;
- Allowing schools to increase their existing Internet capacity to meet demand without requesting a service substitution;
- Encouraging ISPs to expand affordable broadband offerings to low-income people;
- Encouraging broadband providers to open their Wi-Fi routers for use by any residential users;
- Making emergency funding available from the Universal Service Fund for hot spot lending programs operated by schools, libraries and other community organizations in areas where schools and libraries close;



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- Granting the petitions of the West Virginia, Boulder Valley School District, and Microsoft to allow broadband extensions off campus, including through Wi-Fi on buses;
- Providing supplemental funding for Wireless Internet Service Providers (WISPs) to deploy wireless broadband in unserved areas where schools are closed, if the WISP can demonstrate that it can do so within a few days' or weeks' time and more quickly than any other provider;
- Opening a window for rural schools and education organizations to obtain rural EBS licenses;
- Extending all compulsory E-rate deadlines, including, but not be limited to: Form 486, Form 479 for consortia, service substitutions, SPIN Changes, appeals, and PQA and BCAP audits.

Thank you for carefully considering these important recommendations. We appreciate the Commission's bedrock leadership during this challenging period for the nation, which is especially difficult for the millions of students that are currently unable to attend their schools. We encourage you to quickly address these needs and welcome any questions you may have about the specific student and teacher connectivity challenges that SETDA's members are working to address.

Sincerely,

Candice Dodson
Executive Director
SETDA

SETDA exists to lead, inspire, and empower the education community to leverage technology for learning. We serve as a forum for inter-state collaboration and cooperation, the furthering of public-private partnerships in support of public education goals, state-federal relations and advocacy, and professional learning for state educational technology directors and other state education agency staff.