

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Ensuring Children’s Safe Use of Screens and E-rate-Funded Services	WC Docket No. 26-133
Modernizing the E-rate Program for Schools and Libraries	WC Docket No. 13-184
Establishing the Emergency Connectivity Fund to Close the Homework Gap	WC Docket No. 21-93
Promoting Fair and Open Competitive Bidding in the E-rate Program	WC Docket No. 21-455

**COMMENTS OF THE STATE EDUCATIONAL TECHNOLOGY DIRECTORS
ASSOCIATION**

The State Educational Technology Directors Association (SETDA) respectfully submits these comments in response to the Federal Communications Commission’s Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking concerning E-rate and children’s use of E-rate-supported networks and services.¹

SETDA is the principal nonprofit membership association representing state and territorial leaders responsible for educational technology and digital learning. Our members support school districts by working across broadband, instructional technology, professional development, cybersecurity, and other digital learning fields. As a result, our work frequently sits at the intersection of federal telecommunications policies and the state and local education systems that make decisions about how to strategically integrate technology into the nation’s classrooms and other places where students learn.

¹ FCC 26-41, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, WC Docket Nos. 26-133, 13-184, 21-93, & 21-455 (rel. June 26, 2026) [hereinafter NPRM].

The expert perspectives of SETDA’s members about the importance, impact, and need for E-rate are relevant to this rulemaking. The Commission asks important questions about student well-being, screen use, online safety, parental involvement, and the future of school connectivity. SETDA agrees that education leaders should closely examine how technology is used and whether particular uses help students prepare to succeed after graduation. How they do so should be left to state and local education leaders and the communities they serve. Similarly, the Commission should use its telecommunications authority and expertise to focus on meeting the broadband infrastructure needs of schools, libraries, and other sectors.

STATE EXPERIENCE SHOWS THAT ED TECH POLICY REQUIRES CONTEXT, FLEXIBILITY, AND CONTINUOUS IMPROVEMENT, NOT ONE-SIZE-FITS ALL FEDERAL REQUIREMENTS.

The Commission asks whether E-rate funding should be conditioned on screen time limits and, if so, whether the FCC or state and local authorities should determine those limits. It also asks broader questions about who is best positioned to protect children who use E-rate-supported networks.² Without question, state and local education leaders in partnership with their families and communities are the correct people to make screen time and other technology decisions consistent with local values, needs, and conditions.

State and local leadership and responsibility over instructional technology policy should be maintained and prioritized. Fortunately, states are already leading in this area. SETDA’s 2025 State EdTech Trends Report found that three out of four responding states had adopted a device restriction, issued guidance concerning device use, or were considering such policies. Nearly 60 percent reported state efforts supporting digital citizenship, and nearly half reported that their state had issued guidance to districts and educators on responsible classroom technology use.³

² NPRM ¶¶ 30, 49–53.

³ Keith Lee et al., *2025 State EdTech Trends Report* 19, SETDA (2025), <https://www.setda.org/priorities/state-trends/>.

Those findings matter because they show that states are not waiting for a federal screen-time rule. They are testing different approaches based on state law, their unique instructional systems, student needs, and local school district experiences. This locally-informed approach is inherently better able to meet student needs than a single, rigid federal standard.

Delaware offers one example of the ways states are working with local school districts to lead the way. The state adopted digital citizenship standards covering internet safety, online ethics, bias, advertising, and media literacy while giving districts flexibility over how to integrate those standards into instruction. The framework sets statewide expectations but leaves room for local educators to fit implementation to existing courses, schedules, and community needs.⁴

That combination of statewide leadership and local flexibility would be difficult to reproduce through a nationwide screen time condition on E-rate support. Technology also changes quickly. Policies that make sense today may need adjustment as new evidence, instructional models, devices, or technologies emerge. SETDA's survey describes device policy as an evolving area in which states and districts are not only leading, but already learning from both the benefits and drawbacks of recent approaches.⁵

E-RATE PLAYS A VITALLY IMPORTANT ROLE IN CONNECTING SCHOOLS TO HIGH CAPACITY BROADBAND FOR TEACHING AND LEARNING, AND IT SHOULD NOT BE ELIMINATED OR DIMINISHED.

The NPRM asks whether increased rates of school and library connectivity should lead the Commission to narrow E-rate, whether recurring support remains necessary, how connectivity needs may change during the next five to ten years, and whether schools have needs outside the program's current scope.⁶ Ongoing support is absolutely needed to help schools pay for recurring connectivity costs; to upgrade and expand broadband systems over time, and to

⁴ *Id.* at 20.

⁵ *Id.* at 19–20.

⁶ NPRM ¶¶ 17–20.

address emerging connectivity challenges such as the persistent threat of cyberattacks that harm students, personnel, networks, and more.

SETDA encourages the Commission to evaluate those questions based on how modern schools operate, including both the instructional advantages offered by digital learning and the growing dependence of school administrative functions like the delivery of HVAC, security, transportation, and other systems on broadband connections. A high percentage of connected schools does not mean the underlying communications need has disappeared. Schools need E-rate assistance to purchase monthly internet service, operate internal networks, increase capacity as technologies change, replace aging infrastructure, and support new technologies and services.

The Telecommunications Act’s concept of ensuring the delivery of an “evolving level” of service correctly anticipated how schools’ connectivity needs would change and grow. Reaching a basic connectivity benchmark does not freeze school communications needs in place. The level of service required to participate fully in digital education changes as technology and educational practices change.⁷ The Commission is responsible for ensuring that the program continues to deliver on the Telecommunications Act’s promise that school connectivity would keep up with these changes.

Cloud-based systems, digital assessments, data platforms, accessibility services, virtual learning, artificial intelligence, cybersecurity tools, and online professional learning all depend on the presence of a robust communications infrastructure. Putting an even finer point on this relationship, AI-driven tools can help prepare students for life after graduation, but only where schools have the broadband and cybersecurity infrastructure to support them. SETDA’s 2025

⁷ 47 U.S.C. § 254(c)(1); *see also* 47 U.S.C. § 254(h)(2)(A).

EdTech Trends Report reflects that reality: AI emerged as the leading state educational technology initiative even as broadband and cybersecurity remained major priorities.

The better measure of E-rate's future relevance is therefore not simply whether schools are connected. It is whether schools can continue to stay connected because they are able to afford the present and future communications capacity required to meet their educational and operational responsibilities. For state educational technology leaders and their school district partners, that question is central to their planning and decision making.

THE COMMISSION SHOULD NOT CONFLATE EDUCATION SCREEN TIME WITH ENTERTAINMENT SCREEN TIME.

SETDA appreciates the Commission's concern about excessive or inappropriate technology use. State leaders hear similar concerns from parents, educators, and policymakers. The Commission should nevertheless take care not to treat the wide array of young Americans' screen time uses as a single category of like activities. There is a vast difference between the structured use of technology for learning and the unstructured use of screens for entertainment or communication.

The research summarized in ISTE+ASCD's *From Screen Time to Screen Value* report rightfully points policy leaders towards a more sophisticated and precise understanding of how students use technology. The review distinguishes purpose-built educational technology from consumer products such as social media and entertainment platforms. It explains that these categories often have different design incentives, purposes, and patterns of use, and cautions that findings concerning consumer technology do not necessarily apply to educational tools.⁸

That distinction is relevant because some concerns discussed in the NPRM involve personal devices, social media, recreational use, or generalized measures of screen exposure.

⁸ *From Screentime to Screen Value: A Summary of Evidence for Technology in Education* 1-2, ISTE+ASCD (June 26, 2026), <https://iste-ascd.org/screentime-to-screenvalue>. [hereinafter Screen Value]

Those concerns may support policies directed at those uses. They do not, by themselves, establish that broadband-supported instructional applications should be treated the same way.

The educational evidence also points toward context rather than a single measure of time. The review finds that product quality, teacher preparation, curricular alignment, instructional design, and implementation all influence outcomes. The meta-analyses it summarizes identify positive learning effects from technology while also showing that subject, tool design, instructional setting, and implementation affect results.⁹

The same caution applies when discussing academic performance. The ISTE+ASCD review notes that declining assessment results overlapped with increased access to technology, but timing alone does not establish causation. Other major changes occurred during the same period, including new standards, changes in assessments, and the massive disruption caused by the COVID-19 pandemic. The review also identifies research finding improved outcomes when schools used educational technology effectively.¹⁰

SETDA does not suggest that every educational use of technology is effective. The point is narrower: the evidence supports a more nuanced inquiry than a simple relationship between more screen exposure and worse educational outcomes. The bottom line is that state and local education leaders are better positioned to decide whether a particular technology, instructional model, or amount of device use is appropriate for a particular student population or instructional setting.

ADOPTING A ONE-SIZED-FITS-ALL FEDERAL PARENTAL OPT-OUT REQUIREMENT WOULD DISRUPT THE EDUCATION SYSTEM AND SIGNIFICANTLY INCREASE ADMINISTRATIVE BURDENS.

The Commission asks whether schools receiving E-rate support should be required to give parents a meaningful opportunity to opt their children out of screen-based instruction or

⁹ *Id.* at 2–4.

¹⁰ *Id.* at 5.

screen use during the school day. The Commission also asks about effects on educational outcomes, classroom instruction, administrative obligations, and costs.¹¹

SETDA supports strong communication between schools and families about educational technology. Parents should understand how schools use technology, why they use it, what safeguards apply, and how families can raise concerns to local school leaders. SETDA does not believe, however, that participation in E-rate should trigger a uniform federal instructional opt-out which could limit the many benefits of technology and create immense and unmanageable administrative burdens for school leaders.

Technology touches nearly every aspect of modern school systems. Applying a uniform federal opt-out across the nation's nearly 130,000 public and private schools would affect those systems in different ways and almost certainly create unintended consequences. The uses themselves vary widely. States administer required assessments online. Districts use digital tools to make content accessible to students with disabilities and multilingual learners. Rural schools may rely on virtual instruction to offer courses they cannot staff locally. Other districts use adaptive technology for intervention programs or as part of statewide instructional initiatives. A parental opt-out requirement would require every school to adopt an untenable, two-tiered administrative system in all of these and other uses; one using technology and one without.

The central problem is not that parental concerns lack value. They do not. The problem is that a one-size fits all E-rate opt-out condition is too blunt a mechanism for resolving practices that vary across states, districts, grade levels, subjects, and student needs. The research likewise finds that the appropriate role of technology varies by subject, grade, purpose, and learner, and that educational technology can be particularly important for students who need additional access or support.¹²

¹¹ NPRM ¶ 31.

¹² Screen Value, *supra* note 10, at 2, 6, 9.

THE GROWTH AND PERSISTENCE OF CYBERATTACKS ON SCHOOLS SHOWS ONE WAY HOW SCHOOL CONNECTIVITY NEEDS ARE CHANGING.

The Commission asks how the connectivity needs of schools and libraries may change over the next five to ten years and whether the program should respond to needs outside its current scope. State leaders' experience with cybersecurity provides one answer.¹³ Today, schools not only need assistance with acquiring high capacity broadband, they also need assistance to ensure that those connections are secure and safe for students, staff, and school networks.

SETDA's 2025 State EdTech Trends Report identifies cybersecurity as a continuing priority for state education agencies working to help school districts manage their digital learning needs. Cybersecurity held the same share of state technology priorities in 2025 as in 2024 even as AI moved to the top of the list. The report also found that emerging technologies may increase the need for security and infrastructure investment.¹⁴

The funding picture is more concerning. State leaders reported growing shortfalls in cybersecurity funding and a decline in the number of states funding broadband initiatives. SETDA concluded that continued investment in both cybersecurity and access infrastructure is necessary if students are to use digital learning environments safely and securely.¹⁵

These findings show why yesterday's connectivity benchmarks cannot fully describe today's needs. A school network must do more than transmit data. It must remain available for learning, protect students' and staff members' sensitive information, support a growing number of applications, and function in an environment of increasingly sophisticated cyber threats. Achieving that goal requires resources and a strong local cybersecurity plan.

SETDA therefore encourages the Commission to use lessons from the K-12 Schools and Libraries Cybersecurity Pilot Program to inform E-rate's future and to consider how the program

¹³ NPRM ¶¶ 18–20.

¹⁴ SETDA Trends Report, *supra* note 2, at 23.

¹⁵ *Id.* at 24.

can support secure connectivity over time. The precise mechanism can develop as the Commission builds the Pilot record. The larger point is already clear: school communications needs continue to change, and cybersecurity now bears directly on whether a network can reliably support education.

CONCLUSION

These issues matter deeply to students, educators, and families. Children should be safe and healthy online, and schools should retain the flexibility to use technology to meet students' varied learning needs. States and local communities should continue leading decisions about devices, digital citizenship, artificial intelligence, privacy, student well-being, and the appropriate use of technology in instruction.

The FCC should focus E-rate on ensuring that schools and libraries can obtain the vitally important communications infrastructure they need for teaching, learning, and administration. SETDA urges the Commission to preserve E-rate's core connectivity mission, recognize schools' evolving broadband and cybersecurity needs, and avoid conditioning support on one size fits all federal screen-time or parental opt-out requirements.

Respectfully submitted,

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