Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of	)
	)
Maintaining E-rate Funding	) WC Docket No. 13-184

Comments of Common Sense Kids Action

I. **Introduction**

Common Sense Kids Action, the policy arm of Common Sense Media, (collectively "Common Sense") respectfully submits these comments in response to the Public Notice posted on Sep. 22, 2017, by the Federal Communications Commission ("Commission" or "FCC") in the above-captioned proceeding. Common Sense is the nation's leading independent nonprofit organization dedicated to helping kids thrive in a world of media and technology. We empower parents, teachers, and policymakers by providing unbiased information, trusted advice, and innovative tools to help them harness the power of media and technology as a positive force in all kids' lives. The policy arm, Common Sense Kids Action, is building a movement of parents, teachers, business leaders, and other advocates dedicated to making kids our nation's top priority by supporting policies at the state and federal level that contribute to the building blocks of opportunity for kids.   Common Sense has an uncommon reach among parents and teachers, with more than 68 million users and half a million educators across its network.

Common Sense has worked directly with schools and teachers for almost a decade. We have seen technology transform learning and the classroom, and have made it our mission to enable kids and teachers to benefit from technology while at the same

time being cognizant of its risks. We have spearheaded strong student privacy rules, including California's groundbreaking Student Online Privacy Information Protection Act.   And we are deeply committed to ensuring that parents, educators, and students know how to be safe, ethical, responsible, and effective online. Last year, we trained over 25,000 educators as they shift to using digital technology in the classroom. Over 18 million students developed critical digital citizenship skills using our award-winning K-12 Digital Citizenship Curriculum, which was launched in 2009. We offer over 12,000 editorial and teacher reviews, combined, of edtech tools.   Additionally, starting last year, teachers across the country have been able to use our one-of-a-kind privacy evaluations of edtech apps to make smart, informed choices about what to use in their classrooms.

Common Sense also has a history of supporting E-rate, including the recent modernizations and funding increase, working closely with key decision-makers and policymakers to ensure America's students had access to the high-speed broadband and technology necessary for success in the 21ˢᵗ century classroom and beyond.   We have additionally supported effective implementation of the modernized E-rate program, including with Future Ready Schools at the district level. And, together with our partners the State Education Technology Directors Association (SETDA), we created an E-rate Toolkit that helps schools to take advantage of new E-rate opportunities.[1]

We believe that the Commission should continue to robustly support E-Rate modernizations, including funding Category Two services at at least the current level. In a time when technology and access is critical to obtain an education, the E-rate modernizations have been a great success. They have increased connections and

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[1] "E-rate Toolkit." *Common Sense Media.* https://www.commonsensemedia.org/kids-action/about-us/our-issues/school-life/e-rate-toolkit

transparency and reduced costs. The Category Two funding mechanism has enabled long-term planning and allowed schools of all sizes and sophistication, including remote and rural ones, to take better advantage of Wi-Fi and other necessary tools. At the same time, there are still classrooms to connect, and connectivity needs are compounded by moves to 1:1 and other bandwidth intensive learning. Given technology's increasingly critical role in today's classrooms, the Commission's support for Category Two funding should not waiver.

II. Technology is Crucial to Today's Classroom, and E-rate Crucial to Technology

Kids and classrooms, keeping up with national trends, have become frequent users of technology over the last decade. Common Sense research indicates that 98 percent of kids aged 8 and under live in a home with a mobile device, and 42 percent own their *own* tablet device.[2] Additionally, how kids are using media has changed considerably, with the amount of time kids spend on their mobile devices per day tripling since 2011.[3] Kids encounter technology in the classroom as well as at home—74 percent of all teachers use digital resources such as tablets or computers as learning devices.[4] Technological know-how is mandatory for today's students, as 70 percent of teachers report assigning online homework[5], and colleges as well as employers increasingly expect applications and other required tasks to be completed online. In this new digital reality, it is more important than ever to keep each and every kid connected. And, when more than a quarter of low-income households, particularly in rural areas, still lack access

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[2] "The Common Sense Census: Media Use by Kids Age Zero to Eight." *Common Sense Media,* October 2017. https://www.commonsensemedia.org/research/the-common-sense-census-media-use-by-kids-age-zero-to-eight-2017

[3] *Id.*

[4] Larson, Eric. "How Many Teachers Use Technology in the Classroom?" *Mashable,* February 2013. http://mashable.com/2013/02/05/teachers-technology-infographic/#cVXfwfheaZqG

[5] *Federal Communications Commission Broadband Task Force,* 2009.

to high-speed Internet, it's especially crucial for kids to be able to log on in their schools, and obtain experience with digital tools there. E-rate funds enable such experience.

More specifically, Category Two E-rate funds enable robust Wi-Fi services, including managed Wi-Fi services, specific technologies which are playing a larger role in classrooms today. Today, almost all middle and high school students use mobile devices in the classroom, with one-third of all high school students using school-issued mobile devices[6]. Additionally, studies indicate that 73 percent of teachers use mobile devices for teaching and learning, compounding the need for reliable Wi-Fi connections[7]. In the age of new apps and ed tech that can help facilitate learning, it is important that every school has fast and reliable access across the school, including Wi-Fi, so that children in remote areas do not get left behind. Delivering high speed Wi-Fi to all schools and libraries will help ensure that all kids are able to take advantage of new digital educational developments and prepare themselves for postsecondary education and employment.

III. E-Rate Modernization Has Been A Success

The 2014 modernization of the E-rate program has been a tremendous success by all measures. Connectivity and transparency are up, and costs are down. It has dramatically improved school connectivity; in 2013, 40 million students were not meeting the minimum level of school connectivity, but that number diminished to 6.5

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[6] The New Digital Playbook: Understanding the Spectrum of Students' Aspirations and Activities." *Project Tomorrow,* April 2014.
http://www.tomorrow.org/speakup/SU13DigitalLearningPlaybook_StudentReport.html
[7] "How Teachers Are Using Technology at Home." *Pew Research,* February 2013.
http://www.pewinternet.org/2013/02/28/how-teachers-are-using-technology-at-home-and-in-their-classrooms/

million students in 2016.[8] The modernizations also increased price transparency so that applicants could easily find the best prices, resulting in more affordable Internet for schools. After the order's implementation, the median price per Mbps paid by E-rate applicants shrunk from $22.00 in 2013 to $7.05 in 2016.[9]

In particular, the E-rate modernization has been remarkably effective at bringing Category Two services such as Wi-Fi to schools and libraries. The Category Two per student funding model allows schools to calculate budgets and make plans in advance. Indeed, 50,000 institutions received support for Wi-Fi in 2015, compared to 0 in 2013 and 2014.[10] According to Education Superhighway, 97 percent of schools have the fiber-optic connections necessary to meet connectivity needs, and 88 percent have sufficient Wi-Fi access.[11] This is especially helpful to schools as they pursue 1:1 programs that would ensure that digital devices are a part of every student's education.

And, the E-rate modernization and Category Two improvements have been effective in connecting schools in rural areas, where 40 percent of citizens lack access to adequate broadband.[12] Moreover, the ability to take advantage of managed service Wi-Fi offerings and plan in advance can make in-school connectivity more obtainable for rural

[8] "2017 State of the States." *Education Superhighway,* September 2017. https://s3-us-west-1.amazonaws.com/esh-sots-pdfs/educationsuperhighway_2017_state_of_the_states.pdf

[9] "E-Rate Modernization: Progress and the Road Ahead." *Federal Communications Commission*, January 2017. https://www.fcc.gov/document/e-rate-progress-report

[10] *Id.*

[11] "2017 State of the States." *Education Superhighway.* September 2017. https://s3-us-west-1.amazonaws.com/esh-sots-pdfs/educationsuperhighway_2017_state_of_the_states.pdf

[12] See "State K-12 Broadband Leadership: Driving Connectivity and Access." *Common Sense Media and SETDA*, April 2016. https://d2e111jq13me73.cloudfront.net/sites/default/files/uploads/kids_action/broadband_2016.3.24.16.pdf . See also Melendez, Steven, "This Program Gets Rural Schools Online. Will it Survive Trump's FCC?" *Fast Company,* January 2017, , describing impact of E-rate modernizations in general on rural schools. https://www.fastcompany.com/40404086/this-program-gets-rural-schools-online-will-it-survive-trumps-fcc.

schools with fewer resources or staff. This can help lift hard-to-reach schools on to a level digital playing field.

III. There Are Still Kids and Classrooms to Connect, Particularly in Rural Areas

Despite the successes of E-rate, some children are still left behind. Though the 2014 Modernization Order resulted in an 84 percent decrease in the number of kids attending schools that lack a proper Internet connection, 6.5 million kids have yet to be connected.[13] And, despite the growing interest in 1:1 learning, one in five schools is likely unable to take advantage of it: only 81 percent of superintendents, CTOs, and other district leaders report that their district's Wi-Fi could support one wireless device per student.[14]

Students in rural schools have traditionally seen slower developments in acquiring high-speed broadband. Before E-rate modernization, rural schools were significantly more likely than urban schools to lack access to high speed broadband; generally, the more rural the school, the slower the connection.[15] While schools have made great gains in the last few years, there is still much to be done. Of the 2,049 schools that still lack high-speed fiber connections, 77 percent are in rural communities.[16] Lack of availability and high costs in remote areas contribute to this disparity; 54 percent of rural school leaders surveyed said that only one provider sells internet to their school system and 40

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[13] "2017 State of the States," *Education Superhighway.* September 2017. https://s3-us-west-1.amazonaws.com/esh-sots-pdfs/educationsuperhighway_2017_state_of_the_states.pdf
[14] *Id.*

[15] Howley, Caitlin, Kellie Kim, and Stephen Kane. "Broadband and Rural Education: An Examination of the Challenges, Opportunities, and Support Structures that Impact Broadband and Rural Education." *ICF International*, June 2012.

[16] "2017 State of the States." *Education Superhighway.* September 2017. https://s3-us-west-1.amazonaws.com/esh-sots-pdfs/educationsuperhighway_2017_state_of_the_states.pdf

percent received one or fewer qualified proposals in 2016.[17] Because homes in rural families are more likely to lack high speed broadband--39 percent of households in rural areas lack access to broadband of 25/4 Mbps as opposed to 4 percent in urban areas--the need for schools and libraries to be connected is paramount.[18]

IV. E-rate Funding for Category Two Services Must Remain Robust

Given the unquestionable success of E-rate after the 2014 modernizations, we call on the Commission to stay the current course and not make any changes that would weaken the E-rate program or diminish funds available. Additionally, keeping Category Two funding at at least the same level of $150 per student is critical to ensuring the program's continued success. Many schools still do not have adequate broadband for a 21st century education. Currently, 10,000 schools are still in need of Wi-Fi, and 6.5 million students have yet to be connected.[19] In order to get these numbers to zero, the Commission must keep its focus on robustly supporting E-rate.

Another reason to maintain the program and at least the current level of funding for Category Two support is to make the process of acquiring broadband services as easy as possible for school district leaders. These leaders need consistent support without disruptions so they can better form multi-year plans; this stability is necessary for school personnel to innovate and grow their programs. A Category Two per student funding model is better suited to help district leaders plan in the long term and get projects off the ground. Moreover, such a funding model makes it easy to take advantage of now-

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[17] *Id.*

[18] West, Darrell M. and Jack Karsten. "Rural and Urban America Divided by Broadband Access." *The Brookings Institute,* July 2016. https://www.brookings.edu/blog/techtank/2016/07/18/rural-and-urban-america-divided-by-broadband-access/

[19] "2017 State of the States," *Education Superhighway.* September 2017. https://s3-us-west-1.amazonaws.com/esh-sots-pdfs/educationsuperhighway_2017_state_of_the_states.pdf

included managed service providers for Wi-Fi funding. This is particularly helpful for rural schools and those with little expertise or sophistication in this area.

Category Two support is crucial to keep up with current classroom trends nationwide. Many schools have adopted 1:1 device programs for students, which has been shown to boost kids' test scores.[20] Any major technological advancement in the classroom requires a strong Wi-Fi connection, and if schools do not have access to this support, then their students will not be able to yield the educational benefits of new digital advancements that their counterparts in better-funded schools enjoy.

V. Conclusion

The E-rate program has enjoyed remarkable success, but we cannot claim victory until all classrooms and children are connected. We believe the best way to do that is by staying the course with a strong and predictable Category Two program that schools can count on and build from as they ready their classrooms for tomorrow.

Respectfully submitted,

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[20] Herold, Benjamin. "One-to-One Laptop Initiatives Boost Student Scores, Researchers Find." *Education Week,* May 2016. http://blogs.edweek.org/edweek/DigitalEducation/2016/05/one-to-one_laptop_test_scores.html