



Feb. 18, 2022

Chairwoman Jessica Rosenworcel
Commissioner Brendan Carr
Commissioner Geoffrey Starks
Commissioner Nathan Simington
Federal Communications Commission
45 L St. NE Washington, DC 20554

Re: WC Docket No. 13-184, 21-93

REQUEST FOR ADJUSTMENTS TO THE EMERGENCY CONNECTIVITY FUND
PROGRAM AND THE E-RATE PROGRAM

Dear Chairwoman Rosenworcel and Commissioners Carr, Simington, and Starks:

Common Sense, the National Consumer Law Center, on behalf of its low-income clients, the National Digital Inclusion Alliance, Public Knowledge, Kajeet, Rural Strategies, NTEN, United Church of Christ Media Justice Ministry, DigitalC, Cradlepoint, and Digital Wish write to applaud the Commission for its work on the Emergency Connectivity Fund, which, to date, has provided nearly 10 million devices and 5 million home connections to students and library patrons across the country. To maintain and expand this success, we ask the Commission to implement the recommendations made in two recent ex parte submissions: one by the Schools, Health & Libraries Broadband (SHLB) Coalition, the Consortium for School Networking (CoSN), the State Educational Technology Directors Association (SETDA), and the American Library Association (ALA)¹; and the other by the State E-Rate Coordinators' Alliance (SECA).²

As you know well, the homework gap is a pernicious and persistent problem. A 2020 analysis by Common Sense and Boston Consulting Group found that the homework gap affects approximately 15 to 16 million K-12 public school students, or 30% of all public K-12 students.³ Without support for connectivity, these students, and similarly afflicted teachers and library patrons, will lack

¹ SHLB Coalition, CoSN, SETDA, and ALA, Ex Parte ECF Extension Request, WC Docket No. 13-184 and WC Docket 21-93, (January, 2022)
<https://ecfsapi.fcc.gov/file/101281737819629/ECF%20Extension%20request%20-%20FINAL%20-%20Jan%2028%202022.pdf>

² SECA, Ex Parte ECF Extension Request, WC Docket No. 21-93, (February, 2022)
<https://ecfsapi.fcc.gov/file/10211288726728/SECA%20Ex%20Parte%2002.11.2022%20as%20filed.pdf>

³ Chandra, S., Chang, A., Day, L., Fazlullah, A., Liu, J., McBride, L., Mudalige, T., Weiss, D., Closing the K-12 Digital Divide in the Age of Distance Learning. Page 3. San Francisco, CA: Common Sense Media. Boston, Massachusetts, Boston Consulting Group. (2020)

access to education, healthcare, and community services—essential aspects of modern life, whether there is a pandemic or not.

Thankfully, the ECF has made tremendous progress connecting these students. However, for those applicants who applied in the first two rounds of funding, ECF support is scheduled to end on June 30, 2022. If it does end, the millions of students, teachers, and patrons the ECF is connecting will be at risk of falling back into the digital divide. To avoid this, we urge the Commission to consider the following recommendations:

1. Extend the June 30, 2022 service delivery deadline;
2. Open a third funding window in the spring of 2022 to distribute the program's remaining funds;
3. Extend the gift rule waiver to coincide with the extended service delivery deadline;
4. Reconsider the record-keeping requirements with respect to library applicants;
5. Waive the cost allocation rule in the E-rate program, at least for the duration of the public health emergency.

These recommendations, which are further described in the SHLB *ex parte*,⁴ would maximize the impact of existing grants, lessen the burden on overtaxed schools and libraries, provide additional funding for essential connectivity, and ensure that students and patrons are not disconnected in the midst of a pandemic. The ECF is one of the most successful connectivity programs to date, and these recommendations would allow its good work to continue.

Thank you for your time and consideration.

Sincerely,

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⁴ SHLB Coalition, CoSN, SETDA, and ALA, *Ex Parte* ECF Extension Request, WC Docket No. 13-184 and WC Docket 21-93, (January, 2022)
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