



Public Comment on Proposed Rule: FCC To Review E-Rate Program To Ensure Congress's Vision

Submitted on behalf of: Alliance for Learning Innovation

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The Alliance for Learning Innovation (ALI) is pleased to submit comments on the FCC's proposed rule, "*Review E-Rate Program To Ensure Congress's Vision*," concerning the future of the E-Rate program, and the Children's Internet Protection Act (CIPA). ALI urges the Commission to preserve E-Rate's nationwide support for affordable connectivity, reject educational policy conditions that are unrelated to the program's communications mission, and retain the current statutory boundary of CIPA.

ALI is a bipartisan coalition of more than 150 education non-profits, philanthropic organizations, and private sector organizations that work to strengthen the education research and development (R&D) ecosystem so schools can identify, test, and implement solutions that improve student learning. Reliable connectivity is part of the basic infrastructure necessary for that work. It allows schools to use evidence-based instructional resources, operate student information and assessment systems, communicate with families, support students with disabilities, and conduct the data collection needed to determine what works for whom and under what conditions. The Commission should distinguish the network from the decisions made over that network. Concerns about a particular application, lesson device, or amount of recreational screen use should be addressed through evidence-based education policies, not by withdrawing support for broadband.

1) The E-Rate program should remain.

We strongly support the E-Rate program and believe it should remain in place moving forward. For nearly three decades, schools and school districts have relied on E-Rate to help make essential connectivity and network infrastructure more affordable. The program provides eligible schools and libraries with discounts on internet access, data transmission services, internal connections, managed internal broadband services, and basic maintenance of internal connections. It's common for E-Rate discounts to cover between 20 and 90 percent of eligible costs. The program's reach demonstrates how deeply E-Rate has become integrated into school technology infrastructure. According to a 2025 analysis by Funds For Learning comparing the

National Center for the Education Statistics (NCES) school counts with U.S. Schools and Libraries Program, or E-Rate, participation data, 96.3 percent of public schools participate in E-Rate, compared with 32.2 percent of private schools. These figures indicate that E-Rate is not a marginal source of support for schools, and that participation among public schools is nearly universal.

The geographic reach of the program is similarly broad. An analysis of USAC data by the American Association of School Administrators (AASA) found that E-Rate provided approximately \$13.2 billion in funding commitments from fiscal years 2021 – 2025, reaching communities in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. During that period, E-Rate funding reached 3,174 of the nation’s 3,235 counties, approximately 98.1 percent of counties nationwide. This level of participation underscores the role E-Rate plays in supporting the connectivity and network infrastructure on which schools increasingly depend. If E-Rate support were substantially reduced or eliminated, schools and districts would face higher costs for eligible connectivity and networking services. Given the significant budget constraints facing many school systems, those additional costs would require difficult tradeoffs with other educational priorities. E-Rate discounts help schools direct limited local and state resources toward instruction, student services, and other educational needs while maintaining the connectivity necessary for modern school operations. Reliable connectivity is foundational infrastructure for modern schools, supporting instructional activities, administrative functions, communications, data systems, and research and evaluation. We encourage the Commission to preserve the E-Rate program while continuing to examine how its resources can best support reliable, affordable, and effective connectivity for schools, libraries, and students.

2) It is inaccurate to equate school connectivity with student screen time. Broad educational and institutional functions, such as education R&D, depend on school connectivity from E-Rate.

Many activities in schools that rely on internet connectivity could be reduced or eliminated if the discounted connectivity provided through E-Rate were no longer available. School budgets are often constrained, with little flexibility or surplus funding. If schools and districts were required to redirect additional resources toward the cost of internet access and the infrastructure necessary to distribute connectivity throughout their buildings, other student supports, enrichment opportunities, and instructional activities could suffer.

E-Rate currently provides discounts on internet access and data transmission services, as well as internal connections and services necessary to distribute broadband within schools. We agree with the Commission's interest in investigating excessive and inappropriate screen use among children, however, the role of connectivity in schools extends well beyond students spending time on screens. Connectivity is foundational infrastructure that enables teachers, administrators, researchers, and support staff to carry out a wide range of activities that contribute to student learning and school operations. It is therefore important to distinguish between indiscriminate technology use and the purposeful, evidence-based use of technology and connectivity to support educational outcomes.

School connectivity enables and supports:

- Instruction and lesson planning
- Access for students with disabilities
- Student information and instructional systems
- Research and data analysis
- Administrative efficiency
- Family and community communications
- School operations
- Building and technology infrastructure

These functions demonstrate why the Commission should not equate school connectivity with student screen time. A school may require reliable internet access even when students themselves are not directly using a connected device. Evaluating E-Rate primarily through the lens of student screen use would fail to account for the broader educational and institutional functions that depend on school connectivity. This distinction is important as the Commission considers whether and how to modify the E-Rate program. The relevant policy question is not simply how much technology students use, but whether schools have access to the connectivity infrastructure necessary to support effective instruction, educational research, accessibility, and school operations. Maintaining this infrastructure does not require schools to adopt technology indiscriminately, reliable connectivity gives schools the capacity to make informed, evidence-based decisions about when technology is appropriate and how it should be used. The FCC, therefore, should not inappropriately condition E-Rate funding on screen time limits or any examination of the impacts of educational technology. In fact, such impacts can only be examined if a school has reliable internet.

Reliable internet access is also an important component of the education R&D ecosystem. ALI's mission includes advancing education R&D and supporting the development, evaluation, and adoption of evidence-based solutions to improve educational outcomes. School networks and internet access enable educators and researchers to collect and analyze data, evaluate instructional approaches, identify student needs, test interventions, and assess potential solutions in real-world educational settings. They serve not only as a means of delivering technology-enabled instruction, but also as infrastructure for determining what approaches are effective. This distinction is increasingly important as policymakers, educators, researchers, and other stakeholders examine the benefits and limitations of education technology. Research should address questions about the effectiveness and appropriate use of these tools, including the ability to examine student outcomes, compare instructional approaches, analyze patterns in student learning, and evaluate interventions. This work can strengthen the evidence base and help policymakers and educators distinguish between technologies and approaches that improve educational outcomes and those that do not. Maintaining reliable and affordable internet access in schools is important to advancing evidence-based education R&D and enabling researchers and educators to investigate educational challenges, evaluate potential solutions, and translate effective approaches into practice. As the Commission considers the future of E-Rate, it should account for this broader role of school connectivity and recognize that the objective should not simply be to increase or decrease technology use, but to ensure that schools have the infrastructure necessary to determine how technology can be used to best support students.

3) The DCC should not expand CIPA's coverage and should distinguish CIPA protections from screen time limits.

ALI supports effective internet safety policies, age-appropriate digital citizenship education, and technology protections consistent with CIPA. The Commission should retain its current interpretation that CIPA's filtering requirement applies to computers owned or controlled by a school or library. Extending the requirement to privately owned devices connected to an E-Rate supported network would exceed the statute's authority and create significant implementation, privacy, and cost concerns. Schools and libraries generally cannot control software on private devices, reliably determine users' ages or identities, or control over how encrypted applications operate. Extending filtering requirements to these devices could require more intrusive monitoring, increase costs, and require the collection of additional information about students, families, staff, and library patrons. CIPA already provides for local decision-making through

internet safety policies, public notice, hearings or meetings, and local determinations of material inappropriate for minors. The Commission can support compliance through clear guidance and reasonable documentation requirements without expanding CIPA into private-device management.

Finally, the Commission should also distinguish CIPA's technology protection requirements from screen-time limits. CIPA addresses access to specified visual depictions, it does not regulate the duration of technology use. Schools may establish age-appropriate technology practices based on educational objectives and available evidence, while researchers continue to study how the purpose, content, context, and duration of technology use affect learning and well-being. Content filtering should not be conflated with instructional time management.

Conclusion

The Commission should preserve E-Rate as a nationwide, need-based program for affordable connectivity to and within schools and libraries. It should not sunset the program, narrow eligibility based on generalized assumptions about connectivity, or exclude Head Start or prekindergarten providers. It should retain CIPA's focus on institution-owned or controlled computers and pursue program integrity through targeted, proportionate measures. Affordable connectivity is foundational infrastructure. It supports school operations, evidence-based instruction, accessibility, family communication, and the research needed to improve education. The Commission can protect children and public funds while preserving that infrastructure by respecting the statutory division of responsibility among the FCC, state and local education authorities, educators, families, and libraries