

I. Introduction

Common Sense Media, (collectively “Common Sense”) hereby respectfully submits comments on the Federal Communications Commission (“Commission” or “FCC”) Wireline Competition Bureau request on Emergency Broadband Connectivity Fund Assistance as part of the Consolidated Appropriations Act, 2021.¹

Congress has directed the FCC to create the Emergency Broadband Benefit Program (EBB) that will allow low-income people to access the internet. As the Commission seeks comment on how best to implement this congressional directive, we encourage the Commission to consider including schools as an eligible provider in the program and to consider the special needs of schools, kids, and families engaging in distance learning while developing other EBB rules. **We respectfully ask the Commission to enable schools and other anchor institutions to act as providers; to provide clear requirements for service and devices necessary for remote learning; and prioritize raising public awareness by partnering with schools and other anchor institutions to publicize this benefit.**

Below are some suggestions to achieve these goals.

II. Background

Common Sense is the nation’s leading independent nonprofit organization dedicated to helping kids and families 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. Common Sense has an uncommon reach among parents and teachers, with over 100 million users and half a million educators across its network. Common Sense has long been committed to advocating for broadband connectivity for all children and families, in schools and in homes, regardless of their socioeconomic status and geographic location. Common Sense helped steer the LEAD Commission in the early years of digital learning, working to develop a blueprint for digital learning and advance the deployment of necessary technology. Common Sense has supported E-Rate and Lifeline modernizations that help better connect families. Common Sense previously has submitted comments in USF proceedings at the Commission that discussed the importance of high-speed internet connectivity for all children’s success² as well as in response to the coronavirus pandemic as the Commission has worked to better utilize both the Lifeline and E-Rate program to address the dire need for connectivity for kids and their families.³

¹Consolidated Appropriations Act, 2021, H.R. 133, div. N, tit. IX, § 904(b)(1) (2020).

² See Comments of Common Sense, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197. <https://www.common sense media.org/sites/default/files/uploads/csm-blog/fcclifelinefiling2.21.18.pdf> (Feb. 21, 2018).

³ See Comments of Common Sense, Re: Docket Nos. 11-42, 09-197, 96-45, 17-287.

As part of Common Sense's mission to improve the lives of all kids, we have focused on the persistent gap between students who have high-speed internet and modern devices at home and those who do not. Recent analysis of the digital divide for America's K-12 public school students and teachers by Common Sense and Boston Consulting Group found that the "homework gap" is larger than previously estimated. Approximately 15 to 16 million K-12 public school students, or 30% of all public K-12 students, live in households without either an internet connection or device adequate for distance learning at home, a higher number than previously recorded.⁴

III. Schools and Anchor Institutions Should Qualify As Participating Providers.

In creating its process for qualifying EBB providers, the Commission should consider the groundwork school districts have already built and their unique understanding of and access to eligible students lacking the connectivity and devices needed to successfully engage in distance learning. We strongly recommend the Commission consider allowing eligible families to designate their monthly benefit to both traditional providers and schools or other anchor institutions who provide home broadband service or devices that meet the requirements of the program.

As schools shifted to distance learning in March 2020 these institutions stepped up to address the student digital divide. They developed distance learning curriculum, assessments of student and teacher digital divide needs, a procurement process for service and devices, and deployed and managed connectivity, devices and broadband adoption supports. According to the National Cable and Telecommunications Association (NCTA) by November 2020, cable ISPs had participated in hundreds of sponsored service agreements with school districts and community partners to address the distance learning digital divide. NCTA found that this, "represented more than 12,000 schools with roughly 7 million enrolled students—over half of which (roughly 3.7 million students) are eligible for free or reduced-price lunches, which is determining eligibility in many sponsored service programs."⁵ These partnerships represent significant accomplishments to close the digital divide should be taken into account to ensure efficient and effective uptake of the EBB program.

Many schools and states across the country have been engaged in assessing the digital divide needs of their students overlaid against the technical requirements of distance learning curriculum. This data is often quite granular (down to the address level with specifics detailing available speeds, providers, and ability to pay, among other information), and it is used to ensure

https://ecfsapi.fcc.gov/file/10324600214544/Coronavirus%20Letter%20to%20FCC%20re_%20connectivity%20and%20homework%20gap.pdf (March 24, 2020).

⁴ 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).

⁵ <https://www.ncta.com/whats-new/how-the-cable-industry-is-bridging-the-digital-divide>

that state and district efforts efficiently can contract for home broadband service for students, purchase devices, and identify the broadband adoption needs specific to each family situation.

When schools and states step into procure broadband service or devices their efforts often result in lower costs of broadband service both per month and per student. State and school action also lowers the cost of devices compared with the options families face on their own. School involvement eliminates some of the barriers that have plagued broadband adoption among vulnerable families. Schools are the main “subscriber” in sponsored contract models, allowing the schools to help manage not only the costs of service, the process of subscribing, and also to help manage concerns with quality of service. Schools working to quickly stand up distance learning in the midst of the pandemic have more control over the quality of service and can make certain that the service contracted for matches the technical needs of their distance learning curriculum.

The Commission should create a pathway for schools and other anchor institutions to be considered non-Eligible Telecommunications Carriers (non-ETC) providers allowing EBB beneficiaries the opportunity to choose to designate their monthly benefit to a school or other anchor institution that is providing home broadband service and devices which meet the requirements of the program.

IV. High Quality Devices, Broadband Service, and Minimum Speed Requirements Are Critical for Effective Distance Learning

With regards to further clarity related to services eligible for reimbursement in the Emergency Broadband Benefit Program, our research has identified for a robust distance learning experience, students and teachers require:

1. High-speed internet service at home (robust: 200/10 Mbps; adequate: 25/3 Mbps);
2. Internet-enabled learning devices (excluding cellphones);
3. Distance learning instructional content; and
4. Support, including digital literacy resources, teacher and parent training, and social/emotional resources.⁶

While streaming and web browsing have historically formed the majority of internet usage, videoconferencing is increasingly used for distance learning and therefore, both household download and upload speed requirements are increasing. Recent analysis by Common Sense recommended that to engage in robust distance learning students needed access to speeds of 200/10 Mbps, which allows for a level of connectivity that ensures that students are less likely to

⁶ 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 16. San Francisco, CA: Common Sense Media. Boston, Massachusetts, Boston Consulting Group. (2020).

be interrupted due to problems related to connectivity. This speed also allows schools to choose among a wider range of education technologies and develop more robust curriculum.⁷

In addition to internet access, students and teachers need laptops or tablets capable of meeting the distance learning requirements of their curriculum.⁸ Robust distance learning may have different technical requirements based on student age. Younger grade level students may be able to successfully participate in distance learning with a tablet, however, for higher grade levels students working on STEM projects (for example coding or other computer science related curriculum) will need a more robust laptop.

We recommend that the Commission create clear minimum requirements for the EBB and that they work closely with the education community to match the technical requirements needed for successful distance learning.

V. The Commission Should Engage Schools and Anchor Institutions to Promote Awareness

To raise awareness of the EBB program to potential recipients, we recommend that the Commission require providers to publicize in clear language the availability of the benefit, the eligibility requirements, the program process, the service or devices offered, and information on a recipients' (financial or contractual) obligations at the expiration of the EBB. Once providers provide clear information on the specifics of the EBB offering, schools and other anchor institutions can help guide families through the eligibility and sign-up process and support great uptake of the program.⁹ To support awareness and guidance the Commission should provide funding to schools and other anchor institutions that are well positioned to lift up the EBB program as a trusted resource for potential recipients.

VI. Conclusion

For the reasons mentioned above, Common Sense respectfully encourages the Commission to consider including schools as an eligible provider in the program and to consider the special needs of schools, kids and families engaging in distance learning while developing EBB standards and awareness campaigns.

⁷ Ibid.

⁸ Ibid, Page 18.

⁹ Ali, T., Chandra, S., Cherukumilli, S., Fazlullah, A., Hill, H., McAlpine, N., McBride, L., Vaduganathan, N., Weiss, D., Wu, M. *Looking back, looking forward: What it will take to permanently close the K-12 digital divide*. San Francisco, CA: Common Sense.(2021).

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