



Date: October 21, 2016

Comments regarding: FCC DA 16-1051, September 19, 2016,
CC Docket No. 02-6; WC Docket 10-90; WC Docket No. 13-184
**WIRELINE COMPETITION BUREAU SEEKS COMMENT ON PETITIONS REGARDING
OFF-CAMPUS USE OF EXISTING E-RATE SUPPORTED CONNECTIVITY**

To whom it may concern:

Detroit Public Schools (the district) currently provides broadband Internet access, partly paid for with E-rate funding, as a key element in our effort to educate students. The district applauds the FCC's consideration of the petitions to allow E-rate subsidized broadband networks to be accessed by students at home for educational purposes, without an obligation on the E-rate applicant to cost allocate the portion of the traffic attributable to off-campus use.

We agree that in doing so, the Commission would expand the benefits of using E-rate funds and that it is in the public interest to allow greater use of government-supported services and facilities during those times when schools are out of session, particularly because that enhanced access comes at no additional cost to the E-rate program.

We urge the Commission to consider that the absence of high-speed Internet access from many student's homes has created a "homework gap" that disadvantages many of our neediest students. We believe that addressing this problem by including Internet access from student's homes as part of the allowable usage of E-rate funds is directly in line with the program's goals and objectives.

Regarding the petition from Charlotte County Public Schools, we urge the Commission to allow the petition and to issue a declaratory ruling clarifying that the "[participating schools'] E-rate funded internet access service may be used in conjunction with their project" and that their proposal does not violate the Commission's E-rate rules. We agree that this allowance will provide an opportunity for empirical analysis of the effects on students' performance and experience derived from improvements in home broadband availability and will allow the Commission to examine whether such a program could and should be expanded beyond the current requests. We hope that such an analysis will confirm that at-home access to broadband Internet improves student performance and hence should be allowed under E-rate rules.

Regarding the petition from Boulder Valley School District, we agree that the costs associated with after-hours use of Internet facilities are minimal and immaterial because providing access to the district's broadband network after-hours will not incur any additional charges. We also agree



with their argument that “because the school district’s network is designed to ensure that students and teachers have enough bandwidth during school hours, there will be enough bandwidth afterhours to meet students’ needs without incurring additional cost.” Finally, we strongly support Boulder Valley’s argument that granting this waiver will further the goals of the E-rate program “by ensuring that more students have access to Internet connections at home to complete online homework, increasing the efficiency of already existing school bandwidth, and streamlining the application process for E-rate funds—all without any additional costs to the [universal service fund].”

While our district does not have access to the specific technologies in these petitions we share the petitioner’s goals of providing broadband access to our student’s homes as a way to more fully utilize already committed E-rate funds and to improve student performance. This is a win-win for all parties.

The district has taken steps on its own to address the homework gap as evidenced by the outreach effort from our Superintendent outlined below. We urge the FCC to actively pursue changes to the E-rate program that will address this issue.

Submitted Electronically by;

Jon Brent

EXEC DIR DEPLOYMENT AND TECH SUPPORT

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From DPS Superintendent's weekly newsletter...

MDE MEMO #076-16 *Internet Options for Low Income Families*

As the school year begins, the Michigan Department of Education (MDE) encourages districts to share with parents internet options for low income families. Learning can occur "Any Time, Any Place, Any Way, Any Pace," but to continue learning in the home, high speed reliable broadband is crucial. With more devices in the hands of students, districts have shifted away from traditional approaches to homework. According to the Federal Communications Commission (FCC), seven out of ten teachers assign homework that requires high speed internet access, yet in some communities as few as one in three students have home internet connectivity. When students do not have internet access at home, the gap widens in terms of what students can do. Equitable access to the internet is essential to maximize lifetime learning and success.

- http://www.michigan.gov/documents/mde/Connectivity_533585_7.pdf
- <http://everyoneon.org/>

As a reminder, every school should have also received information about the Comcast Essentials program that offers high speed internet for less than \$10/month for low income families. Those brochures should be available for students and their families.