

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Addressing the Homework Gap	)	
Through the E-Rate Program	)	WC Docket No. 21-31
	)	
	)	
To: Chief, Wireline Competition Bureau	)	

**COMMENTS OF THE NATIONAL FOOTBALL LEAGUE**

The National Football League (“NFL”) joins with school districts across the country, libraries, leading technology firms, telecommunications and equipment providers, the Chamber of Commerce, numerous public interest groups and the players coalition, and virtually every sector of society in strongly endorsing the need for concerted government action to ensure that our children have the tools they need to learn while so many schools engage in remote learning. Some of those tools involve access to devices and to technology training, and we note that Congress has passed and is considering legislation to provide additional funds to school districts and others. But a critical tool is getting students connected to their schools, and in this regard the FCC can play a major role in enhancing the ability of schools to continue their teaching mission during the pandemic. The Commission’s Public Notice put the issue best: “As the pandemic continues to force schools and libraries across the country to remain closed and rely on remote learning and virtual services, either in whole or in part, the need for broadband connections—particularly for those students, teachers, staff, and patrons that lack an adequate connection at home—is more critical than ever.”<sup>1</sup>

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<sup>1</sup> Public Notice, WC Docket No. 21-31, at 3 (rel. Feb. 1, 2021).

The NFL recognizes that the need for an adequate online connection is critical to the educational process during the pandemic and that is why prompt FCC action on the pending waiver request is needed. The League also realizes that the harms of not having an adequate connection -- failing to close the “homework gap” -- falls unevenly and hits hardest communities of color and lower-income households in urban and rural settings. We share the views of the Players Coalition, which stated: “With each passing day, millions of students are falling further and further behind due to the digital divide. They deserve better and we know America and the FCC can do better.”<sup>2</sup> As the Players Coalition recognized, the challenges to solving all the problems facing students today involve many stakeholders including Congress, technology and communications companies, schools and libraries, and local communities. But the FCC is in a unique position to do its part by acting on the pending petitions to allow E-rate funds to be used to support remote learning.

The Commission should be encouraged by the support that was demonstrated for granting the waiver. Parties supported Commission action based on the need of schools to offer remote learning. Parties also supported that the waiver should be limited to the 2020 and 2021 school years since by then American schools should be back to in-person teaching. Beyond the 2021 school year, it is important for the Commission to account for existing uses of the E-rate program as the emergency authorization expires.

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<sup>2</sup> Comments of Players Coalition, WC Docket No. 21-31, at 1 (Feb. 8, 2021).

The National Football League respectfully urges the Commission to grant the pending waivers to allow the E-rate funds to be used during this pandemic to close the homework gap. Our children, our schools, and our society all will benefit from that decision.

Respectfully submitted,

/s/ Gerard J. Waldron

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Dated: February 23, 2021