March 21, 2020

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Notice of Ex Parte Presentation*
Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184

Dear Ms. Dortch:

On Friday, March 20, 2020, EducationSuperHighway ("ESH") met with Commissioner Geoffrey Starks and Alisa Valentin, Special Advisor, over the telephone. ESH was represented by Evan Marwell, Jim Kohlenberger, and Jack Lynch.

The purpose of the meeting was to discuss innovative strategies to rapidly enable the roughly 7 million students who are being left behind their classmates because they are disconnected from online learning opportunities at home, and the potential to close this gap by harnessing existing authorities to enable a surge in connectivity options at home during the COVID-19 crisis.

In the meeting, ESH presented the attached document as an innovative potential solution for immediately addressing the home learning gap, which was distributed to the meeting attendees over email. ESH also emphasized that closing schools to slow the transmission of the virus need not slow the transmission of knowledge and education, especially when we can take steps to keep our students connected to home broadband solutions.

Sincerely,

/s/ Evan Marwell

Evan Marwell

CEO

CC: Commissioner Starks

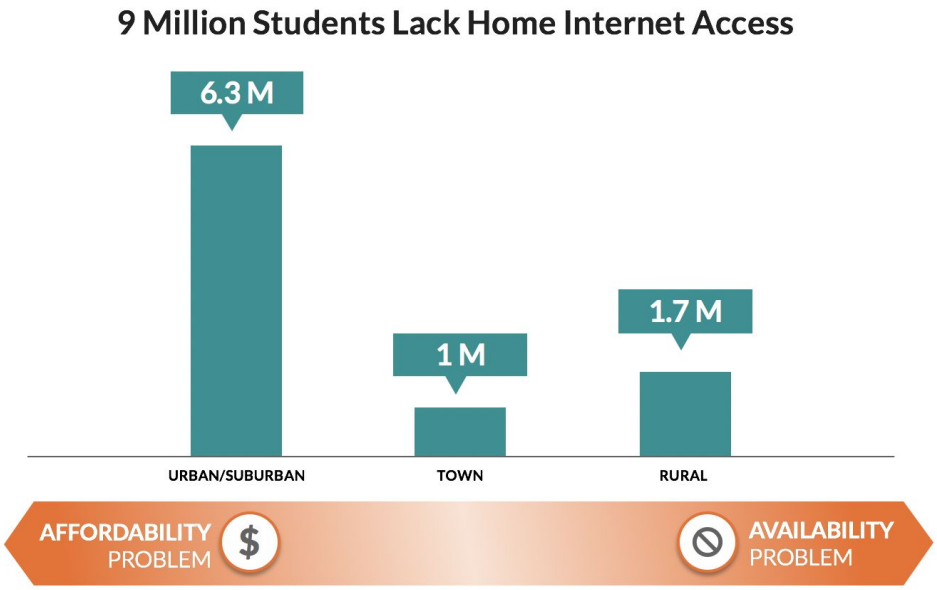
Alisa Valentin,Special Advisor

Addressing the COVID-19 Home Learning Gap

The COVID-19 pandemic has led to over 50 million students being sent home as a result of school closures.[1] Schools are scrambling to provide remote instruction to ensure that while our students are physically quarantined from the classroom, we aren't also quarantining their minds. However, 35% of low income US households with school-age children do not have Internet access at home.[2] For these children, remote instruction is not currently an option.

THE HOME LEARNING GAP IS BOTH AN AFFORDABILITY PROBLEM AND AN AVAILABILITY PROBLEM

Many households without home Internet access cannot afford the cost of service, even though service may be available in their areas. This is primarily the case in urban and suburban locales. Households in rural locales often lack broadband service options altogether.



With an average of 1.3 students per household[3], this means that **we need to rapidly connect 7 million homes to Wi-Fi** if we are going to ensure that no student is left behind due to COVID-19.

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[1] https://www.edweek.org/ew/section/multimedia/map-coronavirus-and-school-closures.html, March 20, 2020

[2] https://www.pewresearch.org/fact-tank/2020/03/16/as-schools-close-due-to-the-coronavirus-some-u-s-students-face-a-digital-homework-gap/, March 20, 2020

[3] Based on 2019 data for households with school aged children from the US Census Bureau and Bureau of Labor Statistics

A SOLUTION: COVID-19 Wi-Fi VOUCHER PROGRAM

While some groups have suggested a school-based hotspot lending program, the implementation of such a strategy would likely face logistical challenges due to schools being closed and mobile hotspot supply chain constraints. An approach that could be more easily and rapidly deployed is for the FCC to tap unused funding in the E-rate program to issue nine month Wi-Fi vouchers to students on the free and reduced lunch program that do not have Wi-Fi at home. The vouchers would be technology neutral - families can use them to obtain a mobile hotspot device and LTE service plans or a Wi-Fi router and service from residential broadband providers. In urban/suburban areas, residential broadband services will likely be most effective, while rural households will be more likely to gain access via mobile services.[4]

VOUCHER DISTRIBUTION LOGISTICS

In order to maximize the speed with which students can join their connected peers in the remote learning classroom, we would propose a school-centered certification process for distributing Wi-Fi vouchers. Schools know who is enrolled and which students are in the FRL program, and thus could issue a voucher to a parent that indicates their student household lacks broadband and is eligible for the service. To limit contact, the voucher can be sent via postal mail, e-mail, or picked up at the school. This voucher then can be redeemed by a provider as certification for enabling and seeking reimbursement for the provision of the service -- limiting any waste fraud or abuse. In this process, each school would be given vouchers for 27%[5] of their free and reduced lunch students -- the national average of FRL student homes that lack broadband -- and they would distribute the vouchers based on local needs. Alternatively, parents could certify in-person or online that they lack home Internet access with the help of their school. This approach would be slower in distributing vouchers but would potentially speed implementation by enabling the notification of service providers when a student in their service area has requested service.

ESTIMATED PROGRAM COST: $700 MILLION - $1 BILLION

Assuming 90% of the 7 million eligible households subscribe to the program, a $10/month cost for wireline or wireless service and a $75 wireless device cost, we estimate the cost of a nine month voucher program to be approximately $700 million to $1 billion depending on the adoption of wireline vs. wireless solutions. This will meet the demand for low income residential broadband and mobile hotspot services even if the pandemic continues into the fall and forces a repeat of school closures as some experts have predicted.

[4] Due to supply chain constraints on mobile hotspots it is critical that we maximize the use of residential broadband services to solve the COVID-19 homework gap as quickly as possible.

[5] 35% of FRL households lack home broadband at an average rate of 1.3 students per household

CLOSING SCHOOLS TO SLOW THE TRANSMISSION OF THE VIRUS NEED NOT SLOW THE TRANSMISSION OF KNOWLEDGE... WHEN WE CAN KEEP OUR KIDS CONNECTED.

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