

March 24, 2021

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington D.D. 20554

Re: Docket No. 21-317

Dear Secretary Dortch:

California IT in Education (CITE) submits the following in response to the Federal Communications Commission's request for comment on emergency relief to allow the use of e-Rate funds to support remote learning during the COVID-19 pandemic.

#### Background on CITE

CITE has been serving the IT Professionals working in California schools since 1960. As a professional membership organization, we provide our members with information, resources, and services to help them successfully support and manage the responsibilities of the IT Department. This includes but may not be limited to administrative and instructional applications, hardware, policies, procurements, and user support. Our members are responsible for the e-Rate program in their organizations.

The following comments are made on behalf of our members. These comments are not intended to exclude our members from submitting comments on behalf of themselves or their organizations.

#### Current Status

CITE is a member of the Schools, Health & Libraries Broadband (SHLB) Coalition and supported their petition calling for the Federal Communications Commission (FCC) to issue an expedited ruling and waivers allowing the use of e-Rate funds for remote learning during the pandemic.<sup>1</sup> This would help students connect to the internet so they can participate in remote learning while their schools are closed.

The Homework Gap, a common term for the digital divide in education, has grown since the pandemic began. Schools are under tremendous pressure to provide off-campus support to parents/guardians and students while students are engaged in distance learning. This support includes training on how to connect to the school's online learning platform to receive instruction, how to submit assignments, troubleshooting issues, and, in some cases, providing

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<sup>1</sup> Petition for Expedited Declaratory Ruling and Waivers filed by the Schools, Health & Libraries Broadband Coalition, et al., WC Docket No. 13-184 (filed Jan. 26, 2021), <https://www.fcc.gov/ecfs/filing/101260036427898> (SHLB Petition).

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internet access to the household so the student can connect to the instruction that is given online.

Current e-Rate rules prohibit the education agency from providing or supporting internet access off-campus with any services or equipment purchased under the e-Rate program. CITE urges the FCC to take prompt action to allow e-Rate funded services and equipment to be used off-campus to enable remote learning so as many students as possible can engage in learning online.

Also, CITE urges the FCC to research ways to permanently close the homework gap. The e-Rate program has been very successful in helping schools and libraries connect to high-speed broadband so that students have access to the tools that are essential for success in today's learning environment. The current environment in which students are participating in distance and hybrid learning will remain as the COVID-19 pandemic ends. Therefore, consistent access to high-speed internet is as essential as textbooks and other classroom materials.

#### Conclusion

CITE urges the FCC to Open an additional e-Rate filing window and allow all schools to request funding for off-campus services necessary for remote learning. Include all hardware and software necessary to support safe and appropriate distance learning and teaching. Also, the FCC should establish a long-term funding strategy to adequately support distance learning through the very successful e-Rate program.

Sincerely,



Andrea F. Bennett  
Executive Director, CITE

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