



March 24, 2020

Chairman Ajit V. Pai  
Commissioner Michael O’Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Docket Nos. 11-42, 09-197, 96-45, 17-287

EMERGENCY REQUEST FOR INCREASED SUPPORT  
DURING THE COVID-19 CRISIS

Dear Chairman Pai, Commissioners O’Rielly, Carr, Rosenworcel and Starks:

On behalf of Common Sense, America’s leading organization dedicated to helping kids and families thrive in a rapidly changing digital world, we thank the Federal Communications Commission for their quick action to secure commitments and connectivity resources from providers during the Coronavirus pandemic.<sup>1</sup> We urge the FCC to continue this critical work to connect our most vulnerable. The FCC is well positioned to provide more comprehensive connectivity support by making use of its emergency powers to better utilize both the Lifeline and E-Rate program to address the dire need for connectivity for kids and their families.<sup>2</sup>

School closures due to the Coronavirus pandemic have brought to the forefront what so many families have understood for years: Lack of access to computers and the internet at home limits learning, making it more difficult for children to keep up or develop the skills that are necessary for academic and professional success. A 2019 Common Sense [nationwide survey](#) of teachers revealed troubling evidence of the continuing "homework gap," a divide between students who have home broadband internet access and students who do not. This survey showed that students in lower-income schools continue to miss out on opportunities for learning that will help set them up for success because their teachers are less likely to assign homework requiring digital tools. These same families will also lack access to telemedicine and critical public health information if they lack access to the robust broadband required.

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<sup>1</sup> Press Release, FCC, Chairman Pai Launches The Keep Americans Connected Pledge (Mar. 13, 2020), <https://www.fcc.gov/document/chairman-pai-launches-keep-americans-connected-pledge>.

<sup>2</sup> 47 U.S.C. §151 (2018), (stating that the Communications Act’s goal is to “make available, so far as possible, to all the people of the United States, without discrimination on the basis of race, color, religion, national origin, or sex, a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable charges, for the purpose of the national defense, for the purpose of promoting safety of life and property...”); see also 47 U.S.C. §254(b)(3) (2018) (“Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services...”).



We strongly encourage the Commission to consider broadband access issues through the lens of digital equity, public health, and safety and work quickly to address both the critical connectivity needs of kids and families across the country. Below are some suggestions to achieve this goal.

#### Measures for Lifeline

Ensure that Lifeline customers are not disconnected, expand and streamline eligibility and verification, require voice service to include unlimited minutes and text, and create an emergency broadband benefit within the program to ensure that families have consistent support to ease the burden of connecting to educational resources and telemedicine. Waive the ETC requirement so all providers can participate. Also it's critical to support the promotion of the Lifeline program ensuring that lifeline materials are distributed alongside other resources related to the crisis.

#### Measures for E-Rate

Schools across the nation are closing and many are choosing to forgo remote learning instruction because they can not equitably serve their unconnected students.<sup>3</sup> The FCC can also take steps to enhance E-Rate so it can support schools and libraries addressing remote learning needs of their students. First the FCC should clarify that schools and libraries do not endanger their E-Rate funding if they choose to leave their wifi network open to students, public or to be used as backhaul<sup>4</sup>. The FCC should also immediately allow E-Rate funded schools to expand capacity to address their new remote learning needs. FCC can use their emergency authority to expand E-Rate to allow for the distribution of hotspots through schools or libraries and community broadband organizations.

From remote learning to access to telemedicine, it is critical during this time of emergency that the government uses every tool available to ensure all families have access to robust broadband service. We believe the Commission has the authority under its universal service principles to deploy emergency measures that will bring great relief to the **nearly 12 million children nationwide** who live in homes without a broadband connection. By exercising its authority, the Commission has the opportunity to act quickly to identify both short term and long term solutions when it comes to addressing this urgent need to support connectivity for all kids.

Sincerely,

James P. Steyer  
CEO and Founder, Common Sense Media

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<sup>3</sup> Avi Wolfman-Arent and Dale Mezzacappa, PBS/WHYY.org. [Philly schools forbid graded 'remote instruction' during shutdown for equity concerns](#), (March 18, 2020)

<sup>4</sup> See Schools and Libraries Universal Service Support Mechanism, A National Broadband Plan for our Future, CC Docket No. 02-6, GN Docket No. 09-51, Sixth Report and Order, 25 FCC 10-175, ¶ 22 (2010).