



Subject: WC Docket No. 21-93 - Public Comment

We appreciate the opportunity to comment on the Federal Trade Commission's Notice *WC Docket No. 17-108*. KIPP Public Schools is a network of 255 public charter schools in twenty states and the District of Columbia educating 112,900 students from PreK3 through 12<sup>th</sup> grade. Over 97% of KIPP students are Black, Indigenous, people of color, 88% are eligible for free and reduced lunch, 12% receive special education services and 17% are designated English Learners.

Since the start of the pandemic, we have had to adapt and adjust and shift our instruction to a primarily virtual model. Though our schools are slowly reopening, many of our students depend on virtual instruction at least one day a week.

KIPP has been able to ensure that our students keep learning because 100% of our students and teachers have received the necessary and appropriate technology and connectivity to learn from home – ranging from laptops and tablets to mobile Wi-Fi devices and cellular phones to act as hotspots in rural areas where broadband service is still unavailable.

We appreciate that the Wireline Competition Bureau is seeking comment on the provision of support from the Emergency Connectivity Fund consistent with section 7402 of the American Rescue Plan. With that in mind, we wanted to share a few considerations from our experience over the last year:

- **Our homes have become our classrooms.** We need to expand home internet so learning continues if schools are closed for in-person instruction or students are quarantined. In addition, we anticipate continuing blended learning efforts at home going forward for homework and out-of-school enrichment. The pandemic has taught us that we must be ready to any emergency and ensuring that our students are equipped with learning tools, especially connected devices, is a critical component of preparedness.
- **The homework gap existed pre-pandemic and will persist unless we use our resources today to help close the gap.** Early in the pandemic we surveyed families and found that somewhere between 15-20% lacked quality home internet access. Since the beginning of the pandemic, we have distributed hot spots directly to families and devices to each student. Unfortunately, this is not the case for every child in America - 16.9 million children remain logged out of instruction because their families lack the necessary home



internet to support online learning. Nationwide, one out of three Black, Latina, American Indian and Alaska Native households do not have high-speed home internet.

- **Even as schools reopen, we know many children will continue to learn online.** While we are focused on providing five days of in-person instruction for all students next year, we know that some portion of families may want a virtual option at some point next school year. In a recent survey we found that somewhere between 10-20% of families (depending on the school and school type) think that they may choose to start the year virtually for their student.

Children, teachers, families, and public schools need the FCC to ensure that:

- **Funds are directed to children and teacher's classrooms**, both those within the four walls of a school building and those within their homes.
- **Ensure that funds are distributed efficiently and to those with the greatest need.** A modified E-Rate process that builds from the best practices and lessons learned from this longstanding program will help ensure that more children can access learning. A two-track application funding that allows for fast funding for most applicants by using per entry budget caps and special considerations for high-cost networks and consortia will help ensure that those that serve the greatest number of students with the greatest need get funding first.
- **Adopt an expanded eligible services list** by providing schools and libraries with the necessary flexibilities to extend their wireless networks and support all components that a remote learner might need.
- **Fill gaps created by past investments** by making pandemic-related purchases eligible from the past school years.
- **Ensure that schools can continue to provide updated devices to students** by allowing hardware to stay with students after one-year of use and for schools to provide more than one supported connection and/or device to each student.

Access to high-speed internet and technology is critical to our nation's recovery. By ensuring that our children have access we are fostering educational equity for our future leaders and innovators.

If you have any questions, please do not hesitate to contact Rebeca Shackleford, Policy Analyst, at [rshackleford@kipp.org](mailto:rshackleford@kipp.org) or 202.549.8284

Sincerely,

KIPP Public Schools