



# CITY OF PHILADELPHIA

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**JAMES F. KENNEY**  
Mayor

**Comments to the  
FEDERAL COMMUNICATIONS COMMISSION  
45 L Street NE  
Washington, DC 20554**

**In the Matter of**  
Emergency Connectivity Fund for Education Connections  
and Devices to Address the Homework Gap  
During the Pandemic  
WC Docket No. 21-93

**Reply Comments Of**

Mayor James Kenney  
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April 5, 2021

The City of Philadelphia recognizes the invaluable importance of E-rate in addressing the critical broadband and device needs of our students. The pandemic has shed light on how providing connectivity and devices requires significant coordination by municipalities across government entities that include not just the primary school district, but the charter school sector, the independent (private and parochial schools), and government support services that can include child welfare and recreational facilities, public housing, and other government entities. Our recommendations are as follows:

1. **Maintain Funding Beyond the American Recovery Plan.** As this new stream of funding is tied to the American Recovery Plan, and yet is crucial to closing the education gap, the City of Philadelphia recommends that the FCC provide continued and sustained funding, such as what exists with the current USF program for schools and libraries beyond the American Rescue Act.

This need will not abate or go away. We must plan for a post-pandemic where educational entities are supported at these levels to meet the connectivity needs of students wherever they are doing their work.

2. **Expand Eligible Billed Entities.** The City of Philadelphia strongly encourages the FCC to broaden the scope of the E-rate program to allow other government and/or non-profit entities and facilities beyond schools and libraries whose primary purpose is also to provide educational opportunities to the general public to become a “Billed Entity” under the program, with the ability to independently apply for and receive funds from the program, as schools and libraries do today. This would significantly expand internet access into neighborhoods that have been historically underserved and allow municipal governments flexibility in delivering public wi-fi and high-speed internet solutions to residents. Expansion of allowable “Billed entities” should include but not be limited to parks and recreation facilities, public housing facilities, WIC offices, higher education facilities, museums, and other municipal properties that serve educational functions that rely on a strong broadband backbone.

As an example, in Philadelphia, Philadelphia Parks and Recreation (PPR) Recreation Centers are community hubs where young people can find their path to a successful future by providing them with experiences and opportunities that enrich their lives and older adults can get support on a variety of needs. Trained PPR staff provide a broad range of high-quality programming to all residents at low to no cost. In partnership with community members, employees plan, organize, and implement these programs in a safe and nurturing environment to help children and adults reach their full potential. PPR is one of Philadelphia's largest out of school time (OST) providers connecting families with after school, weekend, and summer programs for Philadelphia children and youth. Programs are available throughout PPR's system with a variety of activities including creative and performing arts, sports & athletics, STEM, as well as career exposure and skills development opportunities. Over 20 recreation centers are also “KEYSPOTS,” community public computer labs that offer residents digital literacy classes, open access to get work completed, and after school programs that include curriculum on coding, web-design, and other specialized topics. During the pandemic, the PPR recreation centers became “Access Centers” and opened their doors to thousands of young people to do their remote learning with guided support while schools were closed. In doing so, they required significant investment in broadband to upgrade their facilities to meet the needs of students.


In order for these facilities to support students and communities with robust learning opportunities, they require fiber connections of a minimum of 200Mbps symmetrical but preferred at 1Gbps symmetrical to handle the increasing need of students, wi-fi routers, extenders to increase access surrounding the buildings, and wireless network equipment that could be used in combination with other E-rate supported schools or libraries to create a stronger network and enable students to access the internet from a wider range of locations. They also need the IT staffing support to manage the network and infrastructure.

Parks and Recreation facilities and other similarly municipally owned and operated facilities increasingly play a key role in providing educational programming to Philadelphia's youth,

similar to the role that our libraries have traditionally filled. Although the type of programming is different and attuned to the needs of each neighborhood, its often digital nature requires a high-functioning internet connection. As Parks & Recreation facilities continue to adapt their programming to support today's digital education demands, allowing these government-supported educational spaces to be "Billed entities" should be an option just as it is for our schools and libraries.

3. **Coordinate E-rate Broadband Adoption Measures with State and Municipal Governments.** The City of Philadelphia recommends that schools and libraries or other facilities supported by E-rate coordinate measurement of broadband adoption and provision with state and municipal governments. Understanding broadband adoption should not be limited to schools and libraries but must be part of a broader state and municipal yearly benchmarking survey and methodology that can provide states, municipalities, and schools the true clarity they require to understand the scope of the problem and fund appropriate solutions across government departments. Coordination should include:
  - a. Data sharing agreements with local ISPs to provide data on a regular basis on households that are being served so that educational institutions understand who still needs service and where to target efforts. As such, the City recommends that the FCC provide a condition on ISPs who register and participate in any broadband benefit or receive reimbursements from the federal government to provide this data on household connectivity to the federal government, LEAs, states, and municipalities.
  - a. Questions and assessments that can be applied uniformly by all LEAs and libraries and that are statistically validated nationally and/or at a state level to support a full understanding of broadband adoptions among all households
  - b. Allowable expenses to include funds to support states, municipalities, LEAs and libraries the staffing needs required to collect and maintain data tracking systems, and the procurement of or upgrade of systems to ensure integrity and security of this level of data collection and reporting.

Sincerely,



Mayor James .F. Kenney  
City of Philadelphia

**CC.**

Honorable Robert Casey, U.S. Senate  
Honorable Brendan F. Boyle, U.S House of Representatives  
Honorable Mary Gay Scanlon, U.S. House of Representatives