



April 5, 2021

**VIA Electronic Filing**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Comments of NEC Corporation of America Regarding the Use of Emergency Connectivity Fund for Educational Connections and Devices to Address the Homework Gap During the Pandemic (WC Docket No. 21-93)**

Ms. Dortch:

NEC Corporation of America is pleased to submit these comments in the above-captioned proceeding in order to aid the Federal Communications Commission (“Commission”) Wireline Competition Bureau as it considers how to use Emergency Connectivity Fund resources to help close the Homework Gap during the COVID-19 pandemic.<sup>1</sup>

NEC Corporation, a global technology firm with \$28 billion in annual revenue, a presence in over 160 countries and regions, and more than 110,000 employees worldwide, is recognized as a Top 100 Global Innovator and a Fortune Global 500 technology leader. One of the world’s top patent-producing companies, NEC combines advanced technologies, services, knowledge, and its 120 years of operating experience to help promote safety, security, fairness, and efficiency and build a more sustainable world in which all people have the opportunity to reach their full potential.

NEC has had a presence in the United States since 1963, and our North American headquarters is in Irving, Texas. Our major U.S. offices span 16 states. NEC Corporation of America implements, deploys, and supports large-scale information technology and communications solution integrations throughout the United States that perform mission-critical services for national security and law enforcement agencies, other government customers, and commercial businesses. NEC, a member of both the IT and Communications Sector Coordinating Councils, is committed to providing reliable and secure solutions for our U.S. critical infrastructure customers. NEC’s business focuses on public safety, social and communications infrastructure,

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<sup>1</sup> See Public Notice, *Wireline Competition Bureau Seeks Comment on Emergency Connectivity Fund for Educational Connections and Devices to Address the Homework Gap During the Pandemic*, DA 21-317, WC Docket No. 21-93 (rel. Mar. 16, 2021) (“Public Notice”).

and network solutions to accelerate 5G deployment and operation, and the United States is a strategically important market for us in all three of these areas.

Since our founding in 1899, NEC's technologies and solutions have helped telecommunications and mobile infrastructure evolve from twentieth century switching systems, to the first generation of analog systems, and now towards 5G. NEC has worked for over fifty years with educational organizations around the world and provides a carrier-grade, all-in-one enterprise unified communications solution.

We understand that, as the Wireline Competition Bureau's Public Notice explains, the COVID-19 pandemic and related social distancing requirements have forced schools to adapt a virtual and hybrid classroom environment, placing even more strain on parents, teachers, and students, and exacerbating the digital divide and Homework Gap. Schools are under pressure to facilitate appropriate parental involvement and to deliver high teaching quality, positive student outcomes, and strong school safety. Building an inclusive communications environment that encourages collaboration amongst students, faculty, and parents is a crucial step towards alleviating that pressure and achieving those goals.

NEC supports efforts to bridge the digital divide and the Homework Gap by empowering K-12 schools and libraries to more effectively, efficiently, and equitably facilitate distance learning. Furthermore, we think that expanding connectivity and communications capabilities during the pandemic can bolster future efforts to deliver high-quality, accessible, customizable education.

We appreciate that ensuring schools and households have sufficient capabilities for data transmission, internet access, and broadband connection is an important initial step in this process. However, after addressing these basic connectivity infrastructure issues, educational institutions must consider how best to help educators connect with learners and deliver services across this architecture. We believe that the ability to harness the most innovative, reliable, secure, and effective communication tools is as fundamental to delivering high-quality education as is the infrastructure on which the tools operate. As educational institutions consider how best to deliver content, we have seen increased interest in leveraging Unified Communications as a Service (UCaaS) solutions to help educators optimize collaboration, enhance knowledge sharing, improve accessibility, simplify the learning experience, and promote continuity in learning.

UCaaS solutions provide communication features and functionality that extend campus networks into homes, libraries and local businesses, enabling staff and students to work closely with each other from any location, at any time. UCaaS is a cloud-delivered unified communications model that supports six communications functions: (1) enterprise telephony, (2) meetings (audio/video/web conferencing), (3) unified messaging, (4) instant messaging and presence (personal and team), (5) mobility, and (6) communications-enabled business processes.<sup>2</sup> “Typical characteristics include multitenancy (including tenant partitions residing on shared [unified communications] infrastructure, such as data centers, racks, compute, network, common equipment and blades) and self-service web portals for provisioning, management and

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<sup>2</sup> See Gartner, *Unified Communications as a Service (UCaaS)*, INFO. TECH. GLOSSARY (last visited Feb. 15, 2021), <https://www.gartner.com/en/information-technology/glossary/unified-communications-service-ucaas>

performance/usage reporting. The provider delivers applications from a common platform and licenses the service for a recurring subscription charge.”<sup>3</sup>

UCaaS solutions provide cost savings and a better user experience due to their bundled and integrated services. Additionally, because providers own, operate, and maintain UCaaS solutions, schools, libraries, and other educational institutions can spend less time and fewer resources managing and maintaining system performance, dealing with IT administration and interoperability challenges, and mitigating privacy and security risks. Instead, they can dedicate more of their time and resources to developing educational materials and facilitating discussions.

NEC encourages the FCC and other U.S. Federal Government agencies to explore numerous options not only for expanding basic internet access and broadband connectivity to K-12 school staff and students, library patrons, and other educational institutions in communities across the United States but also for positioning those educational institutions to use that infrastructure to connect educators and learners and enable remote learning. Defining “eligible equipment” and/or “advanced telecommunications and information services” in a manner that includes UCaaS solutions could help educational institutions fully leverage external financial support to fulfill their important missions.

We appreciate this opportunity to comment on using the Emergency Connectivity Fund to help close the Homework Gap during the COVID-19 pandemic and welcome opportunities to further collaborate with the Commission on this important proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Takahashi". The signature is fluid and cursive, with a prominent initial "S" and a trailing flourish.

Shin Takahashi  
Chairman and Head of Government Relations

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<sup>3</sup> *Id.*