Fairfax County PUBLIC SCHOOLS
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Scott S. Brabrand, Superintendent
8115 Gatehouse Road
Falls Church, VA 22042

April 5, 2021

VIA ELECTRONIC COMMENT FILING SYSTEM

Office of the Secretary
Federal Communications Commission (FCC)
45 L Street, NE
Washington, DC 20554

Re: ***WC Docket No. 21-93*** *- Comments in Response to Wireline Competition Bureau Seeks Comment on Emergency Connectivity Fund for Educational Connections and Devices to Address the Homework Gap During the Pandemic*

Dear Sir / Madam:

On behalf of Fairfax County Public Schools (FCPS), we are submitting comments in response to the Wireline Competition Bureau (WCB) notice of Emergency Connectivity Fund for Educational Connections and Devices to Address the Homework Gap During the Pandemic published in the Federal Communications Commission (Commission) on March 16th, 2021.

FCPS provides education to 189,000 students and supports over 30,000 staff members. This pandemic disrupted much of how the Division delivered instruction and supported virtual teaching and learning. FCPS, as did most school divisions across the nation, scrambled to purchase and set up a computer for home use for every one of the 189,000 students. We also shored up resources to provide additional at home connectivity in support of virtual learning by purchasing and operating over 8,000 portable wireless MiFi hotspots, and partnered with local ISPs to provide subsidized internet services to qualified students.

We believe the use of technology in delivery and support of instructional programs will continue to accelerate as we move past the pandemic and we will continue to invest in new technology as hybrid learning programs grow.

In its Notice, the Commission asks several questions, and we are pleased to offer our opinions on several of these questions and subjects below.

How to define "advanced telecommunications and information services" for purposes of the Emergency Connectivity Fund. The E-Rate program provides support for what are called "category one" services (which provide connectivity to schools and libraries) and "category two" services (which provide connectivity within schools and libraries).

Advanced telecommunications and information services must involve a computing device and adequate internet connection, which we define as 25 Mbps download and 5 Mbps upload per student in the household. To effectively participate in synchronous virtual learning, we found that students with MiFi or subsidized programs lacked reliable and adequate upload speeds. We request E-Rate provide support for wired or wireless network equipment and services necessary

for remote learning, including, but not limited to, wireless hotspot devices, fixed ISP connection subsidies and basic student computing devices (like laptop or tablet). Beyond just the basic connectivity, FCC should require speed thresholds. School districts should also be able to review and report out on random samples of speed tests with students learning at home to ensure every family can participate with high fidelity student and teacher video conferencing through an available modern video conferencing tool.

The Commission should issue waivers for e-Rate funding for off-premises internet service providers (ISP). This would allow FCPS students to access the commercially available internet options near their place of residence and not require them to drive to a specific location for connectivity. This will improve our efforts to maximize connectivity for remote instruction while maintaining our eligibility for e-Rate reimbursements. FCPS should be allowed the reimbursement of the monthly recurring costs for unlimited data service plans associated with hotspots and tablets. This reimbursement should only require simple documentation.

Finally, we **urge the FCC to consider the creation of a "Category 3" funding stream** which would move beyond the fixed location-based funding constraints as per the current Cat 1 and 2 funding streams. This would help better align funding with our students' mobile digital learning needs. It would also enable schools to move beyond the focus on building an internet which does not cross the perimeters of the building to ultimately help families connect with free and appropriate public education resources virtually from anywhere at any time.

Service Locations. We expect that most students, school staff, and library patrons are engaged in remote learning from their homes during the pandemic and thus need connectivity at home. However, we recognize that some students, school staff, and library patrons are unhoused or otherwise unable to engage in remote learning from home.

The primary educational challenge we witnessed during the pandemic was related to access where families did not have adequate control of the home location to prove ownership to an ISP and get set up with a fast fixed wired connection. Such locations included rental apartment buildings or basements, shared housing situations, cohabitating with a supporting family as part of a larger structure but without ability to pull new wires, or living in a dense location with poor cellular coverage. These locations also tended to be ones with poor or congested wifi signals due to environmental reasons or overuse from neighborhood density

A subset of the access challenge is also associated with the qualification process telecoms have in place when providing subsidized internet packages to families. Eligibility for access programs is largely based on Free or Reduced Meals (FRM) eligibility status, which is protected information and causes undo complications for schools to validate. Either the family has to provide significant documentation, or school divisions must provide -- as an intermediary -- validation for the service providers. The amount of paperwork required to prove eligibility dissuades families who are either reluctant or unable to provide the documentation. Either a more streamlined and equitable ISP-based approval process is needed, or approval control should be shifted to local school entities to help approve funding eligibility based on simpler criteria.

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We also noticed an emerging gap in high-speed Internet access for staff/faculty living in challenging circumstances with no in-between service packages for teachers, who must either submit similar proof of poverty level as noted above or pay the published telecom costs. Instructional staff providing remote instruction played a crucial role in delivering virtual education. A flexible solution which allows school districts to provide remote Internet access on an as-needed basis to teachers would be beneficial in support of virtual teaching and learning environments of the future.

Eligible Uses. We seek comment on whether the Commission should require that equipment and services purchased with funding from the Emergency Connectivity Fund be primarily for educational purposes.

High-speed, reliable and accessible Internet access, in tandem with the effective use of a primary device for learning, are crucial factors in mitigating the homework gap and accelerating students back to their appropriate grade level regardless of instructional scenario (remote or in-person). FCPS should be allowed to use E-rate discounts to purchase goods and services necessary to connect students engaged in virtual/hybrid educational activities. This must include wireless hotspots, student devices and staff devices to support consistent teaching and learning experiences.

There are also several related technology investments beyond initial 'connectivity' that will allow E-Rate applicants to support the transformation required to build an effective remote learning experience. Our vision is an integrated technology ecosystem that supports access to digital content and increased volume and quality of student data. Beyond the student devices FCC should consider the following to be eligible equipment and services, including:

- **Instructional Staff Devices**. The ongoing work to move to digital curriculum and the recognition that a remote learning capacity is now part of going forward strategy underscores the need to invest in the capacity of teacher and instructional staff computing devices. Specifically, we seek to ensure that new devices have adequate processing power to access digital curriculum tools and video streams with students who may be participating remotely, while simultaneously running other classroom management tools.
- **Classroom and School Technology Refresh**. Beyond instructional computing devices, the new K-12 classroom and emergent blended learning models demand the incorporation of additional collaborative technology and a re-imagining of the classroom. FCPS seeks funding support to continue to deliver and support synchronous concurrent learning technologies (such as cameras, speakers, headphones, and mobile video equipment (interactive whiteboards, for example) with an intentional recurring funding allocation stream.

How can the Commission ensure that available funds are efficiently targeted and focused on the needs of rural students; Native American, African American and LatinX students; students with disabilities; and other populations of students that are disproportionately affected by the Homework Gap or are more expensive or difficult to reach?

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Does the E-Rate program's existing discount rate system adequately target students that fall into the Homework Gap, especially low-income students and those in rural or remote areas?

Finally, regarding the Commission's questions on how to prioritize and target limited E-Rate support, we recommend looking beyond the use of division wide eligibility indicators to more directly target student and family needs to help prioritize student technology investments and simplify eligibility for families for subsidized or free home Internet programs.

While division wide or even individual school Title I status remains an appropriate starting point for the identification of populations in need, prioritization for emergency services should be determined by local school divisions using additional school or student level need indicators. Even in school divisions which might not indicate high rates of poverty as measured division wide, there may still be high overall numbers of students in need or pockets of high-need students which would be missed with the use of only broad need indicators. Such local indicators could include prioritization for students in temporary living situations, for English Language Learner students, for students with either physical or emotional disabilities - particularly for those who require specialized outreach or adaptive technologies, or for students or households which fall below certain income thresholds as adjusted for local cost of living factors.

Thank you for the opportunity to provide input on the Commission's important work and we appreciate your consideration.

Sincerely,

Scott S. Brabrand, Superintendent
Fairfax County Public Schools