

April 5, 2021



VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: WC Docket No. 21-93, *Establishing Emergency Connectivity Fund to Close the Homework Gap*
WC Docket No. 13-184, *Modernizing the E-rate Program for Schools and Libraries***

Dear Ms. Dortch:

On behalf of Connected Nation (CN), I write to convey our strong support for the Emergency Connectivity Fund (ECF) framework proposed by Funds for Learning (FFL). We urge the Commission to expeditiously adopt it so that much-needed assistance can reach local school districts and public libraries as soon as possible. We believe the ECF program should support a fair and equitable distribution of funding, while also allowing maximum flexibility to accommodate a wide variety of local needs and circumstances. The Commission should also take steps to minimize applicant burden while encouraging fiscal responsibility and accountability through a combination of financial controls and incentives, with public access to all program data. FFL has described these principles as “*fair, flexible, and fast*”—with “*fiscal accountability*.”

With these principles in mind, we believe the Commission should look to E-rate Category 2 as a prime example of an effective, efficient, equitable framework for ECF *funding distribution*—just as FFL has proposed. By nearly all accounts, the implementation of E-rate Category 2 has been a remarkable success since the program rules were adopted in 2014, resulting in near-ubiquitous Wi-Fi buildout in schools and libraries across the country. The Commission was right then to adopt an equitable, budget allocation-based framework for the distribution of funds—while providing the necessary flexibility to applicants to procure the internal hardware necessary to achieve the program’s objectives.

E-rate Category 2 can also serve as exemplar for ECF program *administration*. USAC has established time-tested processes and procedures that applicants have come to know quite well, so there is no need to “reinvent the wheel” and create a new application process that will needlessly delay implementation, complicate matters, and confuse applicants. A better path forward would be to utilize the people, processes, and application portal (i.e., EPC) that USAC already has in place—and allocate funds based on a formula that emulates E-rate Category 2 to ensure that every eligible school district and library can benefit from the program.

We believe setting a predetermined maximum reimbursable amount for each applicant by formula—with a minimum/floor allocation for small schools and libraries—is an approach that supports cost-conscious planning and decision-making on the part of applicants, while protecting against

excessive funding requests and the potential waste, fraud, and abuse. Two factors can be used to determine the maximum reimbursable amount: 1) the size of a school or library; and 2) the level of poverty in the community being served. This would allow the entire \$7B program to be equitably distributed, and ensure that no library, school, or student is left behind. And because needs vary so greatly, this approach would allow local decisionmakers to have the flexibility they need to procure and implement solutions that are tailored to specific needs. Program guardrails are essential, but we also believe that over-prescription can kill the efficacy of the program.

We also support FFL's recommendation for a two-track application process—one that follows a formulaic allocation for schools and libraries as described above for the first track, while also setting aside a portion of funds—perhaps 10%—for a State Special Request Fund, in which funding is awarded competitively following a structured evaluation process. Such a fund would allow statewide applicants, such as state education networks, to implement large-scale projects that enable remote learning for schools and libraries statewide. We agree with FFL that any uncommitted funds from the formulaic allocation, if available, could be added to the State Special Request Fund.

We are incredibly excited about the impact that the ECF program will have on students and library patrons across the country. The program represents a huge leap forward in our collective efforts to close the digital divide. We truly believe that if the Commission adopts a flexible, student-centered approach that stands on the shoulders of previous E-rate program successes, the ECF program will be an unmitigated success. Therefore, we respectfully urge the Commission's adoption of FFL's proposed framework, and look forward to working alongside you to maximize the program's impact. As always, thank you for your ongoing efforts to prioritize the expansion of broadband access to all Americans, and for your attention to this important matter.

Respectfully,

/s/ Brent Legg

Brent Legg
Executive Vice President
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Connected Nation, Inc.