In 5 years, E-rate modernization enabled the nation to close the classroom connectivity gap

<table>
<thead>
<tr>
<th></th>
<th>2013</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SCHOOLS</strong></td>
<td><strong>OF SCHOOLS WITHOUT FIBER</strong></td>
<td><strong>OF SCHOOLS WITHOUT FIBER</strong></td>
</tr>
<tr>
<td>22,958</td>
<td>504</td>
<td></td>
</tr>
<tr>
<td><strong>STUDENTS</strong></td>
<td><strong>MEETING 100 KBPS PER STUDENT GOAL</strong></td>
<td><strong>MEETING 100 KBPS PER STUDENT GOAL</strong></td>
</tr>
<tr>
<td>4 M</td>
<td>46.8 M</td>
<td></td>
</tr>
<tr>
<td><strong>COST</strong></td>
<td><strong>COST PER MBPS</strong></td>
<td><strong>COST PER MBPS</strong></td>
</tr>
<tr>
<td>$22.00</td>
<td>$1.85</td>
<td></td>
</tr>
</tbody>
</table>

WITH THE RIGHT RULES, THE EMERGENCY CONNECTIVITY FUND CAN HELP TO CLOSE THE HOMEWORK GAP

99.3% schools on fiber
99.6% districts connected
Cost has declined 92% since 2013
Open E-rate data at the line item level enabled price transparency and reduced broadband costs 92%
Open E-rate data dramatically accelerated cost decreases for schools

Average Decline in Cost/Mbps

- All Broadband Users\(^1\): 11%
- All School Districts: 32%
- Districts Leveraging Price Transparency: 52%

1: Source: NCTA
Open data continues to drive dramatic cost savings for the E-rate program.

Price transparency will save E-rate $200-400M per year

<table>
<thead>
<tr>
<th>Price Transparency</th>
<th>Annual E-rate Cost to Meet 1Mbps Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>With industry standard price declines</td>
<td>$1B</td>
</tr>
<tr>
<td>With average school district price declines</td>
<td>$800M</td>
</tr>
<tr>
<td>With price transparency</td>
<td>$600M</td>
</tr>
</tbody>
</table>

"This lack of data has cascading effects and impedes efforts to measure and advance equity. A first step to promoting equity in Government action is to gather the data necessary to inform that effort."

-President Biden in Executive Order on Advancing Racial Equity and Support for Underserved Communities
Without open E-rate data at the line item level the Commission will be unable to track progress in closing the homework gap and make the case for additional funding.

Students connected to the FCC's 100 kbps per student goal:

<table>
<thead>
<tr>
<th>Year</th>
<th>Students Connected</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>24.5 M</td>
</tr>
<tr>
<td>2016</td>
<td>34.5 M</td>
</tr>
<tr>
<td>2017</td>
<td>39.2 M</td>
</tr>
<tr>
<td>2018</td>
<td>44.7 M</td>
</tr>
<tr>
<td>2019</td>
<td>46.3 M</td>
</tr>
</tbody>
</table>
The Commission should follow its standard E-rate practices and make all procurement data related to the Emergency Connectivity Fund transparent and publicly available.

DATA TO COLLECT FOR HOME BROADBAND PURCHASES:

- Broadband Provider
- Service type (e.g., cable, fiber, mobile hotspot, DSL, etc.)
- Upload and download bandwidth speeds
- Data caps (if any)
- Number of households served
- Number of students served
- Upfront cost (per unit and total)
- Monthly recurring cost (per unit and total)
- Contract start date
- Contract end date

DATA TO COLLECT FOR EDUCATIONAL DEVICE PURCHASES:

- Device Manufacturer
- Device type (e.g., iPad, tablet, Chromebook, laptop, desktop, etc.)
- Model number
- Cost per unit
- Total cost
- Processor & speed
- Screen size
- Memory (GB)
- Storage (GB)
- Connectivity (Wi-Fi, LTE, 5G, etc.)
- Includes video camera (yes / no)
- Any other accessories should be itemized (accessory, cost, quantity, etc.)
The Commission should establish that the goal of the Emergency Connectivity Fund is to close the Homework Gap

**VERIFY THE SIZE OF THE HOMEWORK GAP**

- 7 - 14 million students lack Internet or a device
- 50 million students

**ENSURE PROGRESS TOWARD CLOSING THE HOMEWORK GAP**

- Limit the use of the ECF to connecting students who currently lack home broadband connections or educational devices
- Require applicants to certify that they are using the ECF for these unconnected students.

Require applicants to provide estimates of how many students in the school district lack Internet access and how many lack devices.
For the ECF to close the Homework Gap, the FCC needs to prioritize future purchases.

- $1.8B of GEER funding has been used for K-12 home connectivity purchases by at least 36 states.
- $84B of CARES and CRRSA funds for K-12 also may have been used for devices and home connectivity.
For the ECF to close the Homework Gap, the FCC needs to cap device funding at $500 per device

<table>
<thead>
<tr>
<th>Educational Devices</th>
<th>Estimated Total Need</th>
<th>Estimated Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Educational Devices</td>
<td>8.2 Million</td>
<td>$500 / Device</td>
<td>$4.1 Billion</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Home Broadband Connection</th>
<th>Estimated Total Need</th>
<th>Estimated Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Home Broadband Connection</td>
<td>10-15 Million Students</td>
<td>$20 / Month</td>
<td>$2.4 - $3.6 Billion per Year</td>
</tr>
</tbody>
</table>

**Total** | **$6.5 - $7.7 Billion**
For the ECF to close the Homework Gap, the FCC needs to make sponsored service programs eligible

Unconnected families face many obstacles to subscribing to home broadband

- Lack of information about available affordable broadband options
- Complex sign-up processes
- Poor credit ratings or past debt
- Lack of documentation or social security numbers

School districts and states have solved this problem through sponsored service programs

- School district or state identifies unconnected students
- School district or state identifies best home broadband service option for each student
- School district partners with ISP to conduct outreach to and connect each student

Analysis from NCTA and CTIA.

OVER
3 MILLION
have been connected nationally since March 2020 using this approach.
The Commission should update its Community Use rules to allow the use of E-rate funded facilities and services at all times so long as such use is for an educational purpose and free of charge.

By updating its rules regarding the Community Use of Schools E-rate Funded Facilities and Services, the Commission can reduce the cost of closing the Homework Gap by allowing school districts to extend their existing broadband networks into the community.

Eliminating restrictions on the community use of E-rate funded facilities and services will meet the Commission’s objective of promoting broadband access and Congress’s directive to consider how anchor institutions, such as schools, can ensure access to broadband services.
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