

Judy Nathan
Interim Acting General Counsel

May 4, 2021

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

Re: Ex parte submission, Establishing Emergency Connectivity Fund to Close the Homework Gap, WC Docket No. 21-93 by
The New York City Department of Education
Billed Entity Number: 153135

Dear Ms. Dortch,

In response to the draft Report and Order – WC Docket No. 21-93, the New York City Department of Education (NYC DOE) respectfully requests that the Commission reconsider the decision to use July 1, 2020 as the starting date for eligibility for the Emergency Connectivity Fund Program. The Commission opined that it would be easier administratively to align the program with the E-rate funding year. AS currently proposed, schools and libraries would be eligible to seek reimbursement for the purchase of eligible equipment and services between July 1, 2020 and April 30, 2021.

We request that the date of initial eligibility align with the date on which the Secretary of Health and Human Services determined that a public health emergency exists as a result of COVID-19. If a later date is to be considered, we would propose March 1, 2020. By no later than March, most school districts began to anticipate and plan for school closures. By the middle of March, virtually every school in the country had closed for in-person education. At that time, it became critical for schools to address the need for remote equipment and services in order that students could continue their education through the end of the 2019-20 school year. Schools could not simply wait until July 1, 2020 to begin purchasing equipment, as that would have deprived thousands of children of the technology needed to participate in their own education.

In New York City for example, as the decision to close schools in mid-March was being discussed and implemented, the NYC DOE took immediate steps to purchase devices to ensure that our students and teachers could continue to participate in school. The NYC DOE purchased over 300,000 connected devices and Wi-Fi hotspots prior to July 1, 2020, for students and teachers to use during remote learning.

Accordingly, we respectfully urge the Commission to reconsider and revise the start date for eligibility to January 27, 2020 or no later than March 1, 2020.

Respectfully Submitted,
Junaid Qaiser
E-Rate Compliance Officer

CC:

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