

May 15, 2019

**By Electronic Filing**

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

Re: *Transforming the 2.5 GHz Band*, WT Docket No. 18-120

Dear Ms. Dortch:

The State Educational Technology Directors Association (SETDA) and the Consortium for School Networking (CoSN) respectfully urge the Federal Communications Commission (“Commission”) to grant the joint request of the Schools, Health & Libraries Broadband Coalition and other parties to delay final action on the pending Educational Broadband Service (EBS) proceeding (*Transforming the 2.5 GHz Band*, WT Docket No. 18-120).<sup>1</sup> The Commission should grant the parties’ requested delay and provide state and local education leaders with additional time and EBS data. Further time and information will help communities better evaluate the spectrum, relative to their local and regional educational connectivity needs, and provide useful feedback designed to inform the Commission’s final decision about how to best allocate and use this limited and valuable public resource.

SETDA is a not-for profit membership association launched by state education agency leaders in 2001 to serve, support and represent their emerging interests and needs with respect to the use of technology for teaching, learning, and school operations. CoSN is the premier professional association for school system technology leaders and represents over 13 million students nationwide. Collectively, SETDA’s and CoSN’s members serve the state and local education technology professionals responsible for ensuring that students, teachers, and families have access to the technology and high-speed broadband connectivity – at school and at home - required for learning. As such, our organizations have a direct interest, on behalf of students and communities, in the outcome of this rule making.

After the Commission opened the EBS rulemaking last year, SETDA and CoSN initiated formal and informal conversations with our members about EBS and quickly learned that the spectrum’s educational focus was unknown to many state and school district technology leaders. Some SETDA and CoSN members were familiar with EBS and excited to take advantage of this potential opportunity, but in other cases the professionals responsible for meeting schools’ technology and broadband connectivity needs did not know that this spectrum was available to help them better serve their unconnected and under-connected students. This condition likely

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<sup>1</sup> See Joint Request for Delay filed by the Schools, Health & Libraries Broadband Coalition, the North American Catholic Educational Programming Foundation, Inc., Mobile Beacon, Voqal, the National Digital Inclusion Alliance and Public Knowledge (May 13, 2019).

emerged because new EBS licenses have not been available to school districts and other qualified educational entities for over a generation. Expressed differently, the FCC's decision to forego granting new EBS licenses for the past two decades largely removed the 2.5 GHz spectrum from education technology leader's planning lexicon and student connectivity "playbooks".

The absence of easily accessible information about the local availability and characteristics of EBS licenses also calls for an extended comment and deliberation period for this proceeding. Eliminating the educational nature of this band and shifting to an auction model would be a profound policy shift that should not be made without careful consideration of all interested parties. Unfortunately, many parties do not have the full information they need to analyze the Commission's proposals. The Commission's Universal Licensing System provides very little useful public information about existing EBS licensees and available EBS licenses and is very difficult to search and navigate. As a result, state and local educational leaders desperately need additional information about available EBS spectrum in their communities, so that they can evaluate the potential for using the 2.5 GHz band to address their community's troubling homework gaps. Absent additional information, many potential EBS licensees will not be able to determine the EBS proceeding's relevance to their students.

As a result of this proceeding and educational efforts led by SETDA and CoSN, the education technology fields' awareness is growing about EBS's potential to help communities address the homework gap. State and school district leaders need more time and information, however, to evaluate the opportunities the spectrum offers, discuss wireless connectivity ideas with their communities, and contribute insights to the rule making record. We respectfully ask that the Commission provide this additional time and data. After waiting over twenty years to make additional EBS licenses available, we believe a delay in completing this proceeding will not harm future licensees.

Sincerely,

/s/ Candice Dodson

Executive Director

SETDA

P.O. Box 10

Glen Burnie, MD 21060

202.715.6636

/s/Keith Krueger

Chief Executive Officer

CoSN

1325 G Street

Washington, D.C. 20005

202.470.2783