

MAY 13 2019

Chairman Ajit V. Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

FCC Mailroom

RE: WC Docket No. 18-120

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Dear Chairman Pai:

We urge the FCC to retain educational eligibility requirements to hold an Educational Broadband Service (EBS) license. We believe it critical to continue to license much-needed EBS white spaces through priority windows to educational entities such as our Kent County Public Schools on Maryland's rural Eastern Shore. Our schools can then use this spectrum to reach students in tree-covered areas and in our low-income and minority communities who are unserved or underserved by the commercial sector. If the Commission retains the current EBS rules and allows additional licenses, Kent County Schools (which are all Title II schools) will apply for an EBS license. Our schools already use a 1-to-1 digital platform, but many students cannot access these tools or their homework assignments from home. EBS would level the playing field. This is especially important now that the Internet has become a critical platform for learning and opportunity.

The Commission should resist efforts to commercialize the band. Doing so would abandon the band's long educational legacy, undermine the educational EBS services being provided today, and foreclose on the opportunity this proceeding presents to modernize EBS to help solve some of our nation's most pressing broadband challenges—the digital divide and the homework gap. EBS is one of the few tools the Commission has to address the homework gap and limited access.

The Commission has repeatedly expressed concern about the homework gap—the systematic inequality arising from a student's inability to access the high-speed internet connectivity needed to complete homework, out-of-school projects, and other activities that have become crucial parts of modern education. Many of our students go home at the end of each school day to a household that lacks a high-speed Internet connection.

The commercial sector has not, and will not, close the digital divide in low-income rural areas such as Kent County, a very large agricultural area with the smallest population in Maryland. The Commission's existing rules enable EBS licensees to enter into leases that make this spectrum available for commercial use while providing for educational benefits through its educational use rules. At a time when broadband for education is more critical than ever, the Commission should not commercialize the only remaining portion of the only remaining band dedicated to advancing education.

Much is at stake in this proceeding. Broadband is today's essential platform for learning and opportunity. By preserving education in the EBS band the Commission can ensure this public resource serves its highest and best use—connecting students, families, and communities that would otherwise lack Internet access.

Sincerely,

Robert H. Kramer

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