June 24, 2019

Marlene H. Dortch, Secretary

Federal Communications Commission

445 12th Street, S.W., Room TW-B204

Washington, DC 20554

Re: WC Docket No. 18-120 - Transforming the 2.5 GHz band.

Madam Secretary:

On behalf of the Council of Chief State School Officers (CCSSO) and the National Association of State Boards of Education (NASBE), we are writing to provide input to the Federal Communications Commission (FCC) regarding the future of the Educational Broadband Service (EBS). CCSSO is the nonpartisan, nationwide, nonprofit organization of public officials who head departments of elementary and secondary education in the states, the District of Columbia, the Department of Defense Education Activity, the Bureau of Indian Education, and the five U.S. extra-state jurisdictions. A nonpartisan, nonprofit organization, the National Association of State Boards of Education (NASBE) develops, supports, and empowers citizen leaders on state boards of education to strengthen public education systems so students of all backgrounds and circumstances are prepared to succeed in school, work, and life.

States and local school districts across the country are working every day to deliver innovative, equitable, and effective education services to ensure all students graduate prepared for college, careers and life and fuel our nation’s continued economic competitiveness. In the 21st century, many innovative education programs rely upon wireless-enabled education technology to transform classrooms and provide new opportunities to benefit all students. However, many students, particularly those in rural communities across the United States, do not have appropriate access to these educational opportunities because they lack adequate internet access at home or at school. To ensure all students have access to a 21st century education, schools and districts must rely upon federal support to help create more equitable access.

New wireless licenses for the 2.5 GHz Educational Broadband Service (EBS) spectrum band have largely been frozen since the 1990s. During an era in which education technology is transforming the field and creating new educational opportunities for students that rely upon broadband, the FCC should maintain the 2.5 GHz band’s educational focus and provide an opportunity for state education agencies, school districts, and community anchor institutions to acquire new EBS licenses.

The states of Nebraska, Utah, Virginia and others have commented and met with the FCC in support of a strong EBS program that meets the digital learning needs of students. In Nebraska, for example, the state would use statewide EBS licenses to provide wireless broadband service to students while at home and on school buses. Currently, there are up to an estimated 60,000 students in the state that currently do not have adequate internet access at home. This lack of connectivity limits students’ academic opportunities and the nation’s future economic competitiveness.

We are also pleased that the U.S. Department of Education filed a Notice of Ex Parte on June 7, 2019 that urged the FCC to “maintain and modernize the current educational priority of the EBS spectrum by keeping the current eligibility requirements for EBS licensing, modernizing the educational use requirement, and issuing new EBS licenses.”

CCSSO and NASBE strongly encourage the FCC to retain preferences for educational institutions as it considers changes to the EBS program and to make state education agencies and community anchor institutions eligible to hold EBS licenses.

Sincerely,

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Description generated with high confidence

Carissa Moffat Miller Robert Hull

Executive Director President and CEO

Council of Chief State School Officers National Association of State Boards of Education