Honorable Ajit Pai Honorable Michael O’Reilly

Chairman Commissioner

Federal Communications Commission Federal Communications Commission

445 12th Street S.W. 445 12th Street S.W.

Washington, DC 20554 Washington, DC 20554

Honorable Brendan Carr Honorable Jessica Rosenworcel

Commissioner Commissioner

445 12th Street S.W. 445 12th Street S.W.

Washington D.C. 20554 Washington D.C. 20554

Honorable Geoffrey Starks

Commissioner

445 12th Street S.W.

Washington D.C. 20554

Dear Chairman Pai and Commissioners O’Reilly, Carr, Rosenworcel, and Starks:

The Colorado Association of School Boards (CASB) represents all 178 of the locally elected Boards of Education in Colorado. Today we are writing to express CASB’s concern with the proposal currently being considered by the Commission to establish an overall funding cap on the Universal Services Fund (USF).

As you are aware, the Federal Communications Commission (FCC) is charged with the mission of advancing access to voice and broadband networks. Federal law requires the FCC to ensure citizens, including those in rural areas of the nation, have access to “telecommunication and information services.” The “E-Rate” program included under the USF is especially important to students in Colorado. Educating students to compete on a global scale requires students having high speed broadband to access the latest curriculum and research. All Colorado students need access at school and local libraries, this is especially true for students in low income and rural areas. Rural Colorado continues to lag behind other areas of the state in connectivity and there are still enormous broadband gaps when students are out of school. Without the E-Rate discounts, many of these rural areas would be unable to provide these services, thus leaving large sections of Colorado’s student population behind.

Placing a funding cap on the USF programs would pit each program in direct competition. This would ensure the programs would be unable to carry out the legislative intent Congress envisioned. The goal of Congress was to provide four distinct programs, each with specific funding, not one funding pool where the four programs had to fight for funding if an overall cap was reached. Currently, the four programs included in the USF have funding caps in place. This structure negates the need for an overall cap.

Colorado Boards of Education rely on E-Rate funds when planning district budgets. Introducing uncertainty as to the availability of E-Rate funds would make it more difficult to provide the resources every student needs to reach their full academic potential. CASB members highlight for the Commission, data that shows students achieve much better outcomes when they have reliable internet access. Access to these tools are still missing for a wide swath of American students in rural and low-income areas. A report from the Institute of Education Services (IES) released in 2018 highlights this disparity: [*https://all4ed.org/new-report-on-student-internet-access-at-home-shows-persisting-digital-divide/*.](https://all4ed.org/new-report-on-student-internet-access-at-home-shows-persisting-digital-divide/)

The FCC should be doing all it can to provide even more access for students instead of putting rules in place that would lessen student’s ability to access the essential educational resources available online. Members of the Colorado Association of School Boards strongly encourage the FCC to not implement rules that would place new and unnecessary restrictions on E-Rate funding and all of the programs included under the USF.

Thank you for your time in considering these comments.

Respectfully,

Cheri Wrench Kathy Gebhard

Executive Director President of the Board of Directors

Colorado Association of School Boards Colorado Association of School Boards

CC:

The Honorable Diana DeGette The Honorable Michael Bennet

Colorado 1st Congressional District Senator for Colorado

The Honorable Joe Neguse The Honorable Cory Gardner

Colorado 2nd Congressional District Senator for Colorado

The Honorable Scott Tipton

Colorado 3rd Congressional District

The Honorable Ken Buck

Colorado 4th Congressional District

The Honorable Doug Lamborn

Colorado 5th Congressional District

The Honorable Jason Crow

Colorado 6th Congressional District

The Honorable Ed Perlmutter

Colorado 7th Congressional District