**Before the**
**Federal Communications Commission**
**Washington, D.C. 20554**

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| In the Matter of | **)** | |
| | **)** | |
| Amendment of Parts 1, 21, 73, 74 and 101 of | **)** | |
| the Commission's Rules to Facilitate the | **)** | WT Docket No. 03-66 |
| Provision of Fixed and Mobile Broadband | **)** | (Terminated) |
| Access, Educational and Other Advanced | **)** | |
| Services in the 2150-2162 and 2500-2690 | **)** | |
| MHz Bands | **)** | |
| | **)** | |
| Transforming the 2.5 GHz Band | **)** | WT Docket No. 18-120 |

## COMMENTS OF TECHSOUP GLOBAL

TechSoup Global ("TechSoup") urges the FCC to preserve the current structure of licensing EBS spectrum to educational institutions and nonprofit organizations that serve the needs of educational institutions.

TechSoup is a San Francisco-based 501(c)(3) nonprofit organization established in 1987. TechSoup's mission is to bridge the "digital divide" that spurs inequality in communities across not just the U.S., but the globe. Working with over 66 donor partners, including major technology providers like Microsoft, Adobe, Google and Amazon, TechSoup provides technologically underserved communities with vital technology and connectivity services.  Included among such services are internet access, funding, hardware, software, and training, including product donations to the social sector valued at over $11.6 billion USD.

Researchers at Purdue University released an investigative report in March 2018[1] concluding that the apparent digital divide is the most critical issue of the 21st century. A crucial hurdle faced by members of almost all communities across the U.S. is the lack of access to affordable, unlimited internet. Roughly one-third of American adults currently lack broadband internet service at home[2.] (Pew Research Center, 2018).

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[1] Purdue University. (2018). *Research & Policy Insights – Digital Divide in the U.S.*. Retrieved from https://pcrd.purdue.edu/files/media/003-DDI-US.pdf

[2] Pew Research Center. (2018, February). *Internet/Broadband Fact Sheet.* Retrieved from http://www.pewinternet.org/fact-sheet/internet-broadband/

This very digital divide is what inspired TechSoup in 2012 to partner with Mobile Beacon, a subsidiary of NACEPF, and the first U.S. broadband provider willing to make donations to the nonprofit sector. Mobile Beacon provides hotspot devices with internet service to qualified 501(c)(3) schools, nonprofits, and public libraries serving their local communities. TechSoup maintains a rigorous validation process to ensure that only eligible nonprofit organizations meeting specific qualifications have access to these hotspot devices generously donated by Mobile Beacon.

The widespread need that 501(c)(3) nonprofits, schools, and libraries have for internet access and related broadband services is reflected in the fact that Mobile Beacon's service has become one of the most requested donations among our donor partner offerings. As of June 2018, TechSoup has facilitated donation requests resulting in more than 24,000 Mobile Beacon hotspot devices and internet service plans being distributed to 7,103 eligible 501(c)(3) schools, nonprofit organizations, and public libraries across the nation. These community-based organizations and their constituencies rely on affordable, unlimited, high-speed internet service every day.

According to a recent survey, nearly a third of Mobile Beacon's nonprofit and educational clients rely on Mobile Beacon's service as their main internet connection, and nearly 70% reported that Mobile Beacon's unlimited internet service has enabled them to expand program services within their communities. The people served by these nonprofit and educational entities reported that their constituents most often use Mobile Beacon's internet service for research, homework, email, and job-skills training. [3]

The uncapped, high-speed broadband service these nonprofit organizations receive from Mobile Beacon — and the benefits they extend to the constituents they serve — is nationwide, notwithstanding Mobile Beacon's physical address in Rhode Island. We believe the number of educational and nonprofit organizations using Mobile Beacon's service, and the even greater number of their constituents served, is a far better proxy than a physical address for verifying Mobile Beacon's firm commitment to the needs of technology-disadvantaged communities across the country.

At a time when our society is becoming ever more dependent on technology and internet access, Mobile Beacon's uncapped, mobile broadband service has been pivotal to helping nonprofits and educational institutions close the digital divide—and, notably, the "homework gap"—by sharing that broadband connectivity with the people they serve. As a powerful example of the benefits Mobile Beacon brings to communities as an EBS licensee, we can look to San Mateo County Library (SMCL). Understanding that library patrons' need for internet access goes beyond the physical boundaries of the library, SMCL took the lead in providing free unlimited internet access to its community by launching its "Bring the Internet Home" program in 2015. This program offers any San Mateo County library patron 18 years or older the opportunity to borrow a Wi-Fi hotspot for one week.

This new "In Luck" library service has enabled hundreds of households to continue educational activities at home, increase digital literacy skills, and take advantage of online education, health, employment,

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[3] Schartman-Cycyk, S., K. Messier., (2018), *Creating opportunity through connectivity.* Retrieved from https://www.mobilebeacon.org/wp-content/uploads/2017/06/MB_CreatingOpportunitiesResearchPaper_Web.pdf

and community resources. SMCL received over 200 donated Wi-Fi hotspots through Mobile Beacon's donation program with TechSoup. Funding for this program was provided by a state grant, which helped cover Mobile Beacon's $10/month, unlimited 4G internet data plans.

As a technology-focused charitable organization, TechSoup recognizes the importance in developing a 5G infrastructure that will serve the country for many years to come. However, we firmly believe that the proposed EBS reforms to eliminate current educational eligibility requirements for EBS, and to exclude nonprofits from obtaining future EBS licenses going forward, is not the correct path of implementation.

Without the educational eligibility and education use requirements that enabled Mobile Beacon to negotiate for the substantial number of broadband accounts and devices being used by the education and nonprofit sector,  we believe thousands of anchor institutions and the hundreds of thousands of people they serve will be left behind and unable to partake in essential activities. Changing these rules will also make it impossible for other nonprofit and educational institutions to replicate Mobile Beacon's successful model.

Furthermore, through our understanding of the needs of communities across the nation, we support expanding the FCC's educational use rules from only acknowledging accredited educational institutions to including more types of legitimate nonprofit educational organizations such as those that support after-school programs, adult education, digital literacy, and workforce development. This will ensure EBS spectrum is used for lifelong learning.

For the sake of the public's best interest, we urge the FCC not to eliminate educational eligibility to hold an EBS license, and not to make nonprofits like Mobile Beacon ineligible for additional EBS licenses because of their nonprofit status or physical location. The FCC should be looking for ways to build on the widespread success of Mobile Beacon's use of its EBS spectrum rather than proposing rules that would diminish or eliminate such use.


Respectfully Submitted,

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