

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

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 DIGITAL WISH**

Digital Wish strongly supports maintaining the current eligibility requirements to hold an Educational Broadband Service (EBS) license. We also recommend the FCC allow existing EBS licensees to continue to grow their programs by giving them a chance to apply for additional licenses in a third priority window.

**Hotspot Donations to US Schools** - Over the past five years, Digital Wish has been working with Mobile Beacon to bring internet to schools, teachers and students that have been without access for a variety of reasons including geography and prohibitive costs. The need for hotspot donations and discounted internet service has been the highest need (most requested technology donation) of our 65,000 Digital Wish USA educator members. Digital Wish is a 501(c)(3) nonprofit organization with a mission of helping US public and private nonprofit schools with the safe and effective use of educational technology. Helping our members get access to affordable internet for advancing learning opportunities is a key element of our mission.

Mobile Beacon's broadband service supports thousands of students and teachers across the United States with a reliable internet connection to accomplish their education work and learning. In addition, schools are saving significant budgeted dollars with an EBS-enabled, private, \$10/month internet plan that offers uncapped data. These savings are reinvested to support other critically underfunded educational programs. Some school districts using the Mobile Beacon service are saving tens of thousands in internet costs each year. Mobile Beacon's donation program has provided over 3,100 free 4G hotspots to 660 US schools and the requests for donations have been steadily increasing as more teachers learn about this program.

**Major Educational Shift to Online Learning** - As more US schools transition from traditional textbooks to online learning, internet access for all students is critical. Without it, schools moving to online learning are inadvertently creating a condition of inequality where students without home access to the internet have a more difficult time getting homework done. Here are a few examples of how Mobile Beacon's EBS service is being used by school districts across the country.

*Oak Park Elementary School District 97 is doing its part to make sure that students have access to the internet when they are not in school. In January 2018, the District announced that they would provide a free WiFi hotspot and cover the monthly cost of internet service to eligible students who do not have internet access at home. The program, was started to "help increase student access to valuable online learning resources, while also bridging the digital divide and ensuring greater educational equity," officials said in a statement.<sup>1</sup>*

*Kipp St. Louis Schools opened Kipp Triumph Academy in fall of 2015. They served 100 fifth graders, 97% who qualify for free or reduced lunch. Kipp Triumph Academy needed more space to expand to seventh grade, so they bought a new building on July 19th, with the goal of having the building renovated by the first day of school. The school fell within AT&T's coverage area, but realized the building had no infrastructure for AT&T service. They needed permits from the city and state before they could have internet access throughout the school. At Kipp Triumph Academy teachers run their classrooms using Google's platform, which is not accessible without internet access. The Director of Technology found Mobile Beacon's donation program on Digital Wish. The school was able to get 40 hotspots through the program so teachers and students would have internet access on the first day of school.*

*"About 21% of our students do not have internet access at home." My students rely on Mobile Beacon's service to carry on their school work after the library closes to do research online, to access school resources, or even submit assignments. Our community is very rural and there are no free wi-fi options." - School teacher in rural Florida*

*"The Mobile Beacon devices saved us! Until last year, only the main buildings of the school had internet access, even for teachers. But we had teachers and classrooms outside in the portables. Before the devices, teachers had to come into the school on their free time to enter attendance and grades on the computer. With the Mobile Beacon devices, all teachers were able to use the technology straight from their own classrooms even if they were in the portables. Also, the Mobile Beacon devices have been a great boon to our Broadcast Magnet program. Many programs and news feeds are blocked or so slow that the Magnet students had issues getting the video they needed. With the mobile hotspot, the students were able to download needed video to*

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<sup>1</sup> Lisa Marie Farver, District 97 Offers Free Home Internet For Students In Need, Patch.com (Aug. 7, 2018, 4:04 PM) ("District 97 Offers Free Home Internet For Students In Need"), <https://patch.com/illinois/oakpark/district-97-offers-free-home-internet-students-need>.

*share as well as upload their own videos for competitions.” Dr. Suzanne B. - South Miami Community Middle School*

As you can see from these few examples, Mobile Beacon’s service and hotspots has become an invaluable tool for schools, teachers and students. Here’s a sampling of the many ways the hotspots are being used:

- Provides consistent internet access in classrooms when the school’s internet service is too slow.
- Provides home internet access for students and teacher to access Google Classroom and other virtual tools.
- Virtual school teachers and students get internet access wherever they need it.
- Traveling educators get access to online files for documenting work securely.
- Student athletes get homework done while traveling on buses or waiting for their games to start.
- Provides a reliable internet backup system during critical student online testing sessions.
- Enables video streaming of school events, which enables greater numbers of friends and family to watch, even if they can’t physically attend.
- Strengthen 1:1 computing programs that previously provided a laptop or tablet without a data plan.
- Set up web conferences with guest speakers for your classroom students.
- Create a lending pool of hotspots for students to use at home to improve internet access equity for all students.

We strongly encourage the FCC to maintain educational eligibility to hold an EBS license and to keep allowing non-profit organizations such as Mobile Beacon to administer this crucial service to public and private schools and their students. If this spectrum were sold off to commercial parties, it would certainly damage the growth of our current internet based educational programs, create greater inequity among students, and create an added tax burden to taxpayers if the government had to provide an equivalent program to replace the level of service that private, national nonprofit EBS licensees like Mobile Beacon are currently providing.

Respectfully,

Gordon Woodrow

Executive Director  
Digital Wish