

**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 Provision of  
Fixed and Mobile Broadband Access, Educational  
and Other Advanced Services in the 2150-2162 and  
2500-2690 MHz Bands

WT Docket No. 18-120

Transforming the 2.5 GHz Band

**Reply Comments of The Source for Learning, Inc.**

The Source for Learning, Inc. ("SFL") files these Reply Comments in support of Comments submitted in this proceeding by the National EBS Association and the Catholic Technology Network ("NEBSA/CTN Comments").<sup>1</sup> SFL urges the Federal Communications Commission to adopt the recommendations advanced by NEBSA/CTN and to maintain the educational reservation within the Educational Broadband Service ("EBS") Band.

***Background***

SFL is a nonprofit organization established in 1979 on a commitment to developing and delivering high-quality educational content designed to help professional educators enhance teaching and learning. As an early licensee in the Instructional Television Fixed Service, which

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<sup>1</sup> Joint Comments, National EBS Association and Catholic Technology Network, WT Docket No. 18-120 (filed Aug. 8, 2018). In addition to being President and CEO of SFL, the undersigned is the current president of the National EBS Association.

later became EBS, SFL began delivering content in partnership with schools using instructional television models in Geographic Service Areas (“GSAs”) where SFL holds licenses. Over the years, as EBS has transitioned from analog- to digital- to Internet-based solutions, so have our services. In fact, in 1997, SFL (then called the Network for Instructional TV, or NITV), in partnership with George Washington University (also an EBS licensee) and a commercial operator, launched the first public school wireless Internet delivery to a D.C. middle school. FCC Chairman Reed Hundt and U.S. Department of Education Technology Director Linda Roberts, were on site to witness the event. Today, SFL continues to use EBS to advance its educational mission. *SFL Broadband* provides free wireless internet access, services and support to primarily underserved schools and educational programs located in its GSAs. Through the use of mobile hotspots and/or other 2.5GHz enabled devices, teachers, students and staff can access our K-12 and early childhood resources and/or support other broadband needs. SFL’s leasing relationships with commercial operators allow SFL to use 2.5 GHz and the benefits of EBS leasing to support offering Internet services and spectrum-based resources at no cost to K-12 and early childhood educators, both within our GSAs and elsewhere nationally. SFL’s Internet resources include:

- ***K-12 Education.*** Through its *TeachersFirst* website, SFL develops and manages a rich collection of on average 15,000 free, teacher-reviewed web-based resources, lessons and units along with curated and original classroom ready content. SFL’s *OK2Ask* offers professional learning services in the form of live and on-demand virtual workshops and Twitter chats. Topics focus on technology integration blending pedagogical methods with hands-on practice. Teachers can earn credit, certifications and digital badges for their participation. SFL’s *MySciLife* allows teachers to engage students in learning digital citizenship and life sciences using a free, safe, social learning tool designed for middle level education.
- ***Early Childhood Education (Birth to 66 months)*** SFL’s *PreschoolFirst* offerings give early childhood educators access to a research-based, online assessment system

that aligns developmentally appropriate behaviors with play-based activities. Complete with observation and reporting tools, educators can monitor and assist children achieve skills necessary for kindergarten and beyond across five key developmental domains. Professional learning is offered through a series of webinars sharing best practices by field experts and an online, professional administrator credential recognized by the largest early childhood education association.

On average, 36,000 educators subscribe to our services annually, and thousands more access our websites and online programs each and every day. As described below, SFL urges the Commission to ensure that any EBS rule changes preserve the educational mission of EBS.

### ***Discussion***

Last November, the Internet Society published a report stating that

*Education is at the heart of capacity-building. It is through education that people gain skills that equip them to find jobs, start businesses, lead fulfilling lives and provide for themselves and their families. Education builds the capabilities that societies also require to improve productivity and achieve economic growth, to manage health and social services, and to play a full part in the global community of nations.*<sup>2</sup>

Since the 1960s, when the FCC transformed the 2.5 GHz band by devoting a portion of the spectrum to education, the FCC has continued to cultivate such “capacity building” via policies to promote educational use of spectrum. The regulatory environment for broadband access, especially the extent to which it encourages investment and innovation, will be critical in facilitating educational improvements. As many commenters have noted, the educational use component of EBS has fostered investment and invention in broadband technology and

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<sup>2</sup> [https://www.internetsociety.org/wp-content/uploads/2017/11/Internet-Access-Education\\_2017120.pdf](https://www.internetsociety.org/wp-content/uploads/2017/11/Internet-Access-Education_2017120.pdf) (last visited Sept. 5, 2018). The Internet Society supports standards-making activity for the Internet.

education. Commercial operators have noted how EBS has been critical to current network deployments and future build strategies, saying that EBS is particularly important for 5G and Internet of Things services. EBS licensees and beneficiaries of EBS services clearly demonstrate how EBS is directly contributing to digital equity, closing the homework gap, building safer and smarter campuses, expanding educational access and facilitating lifelong learning, all while helping to lay a foundation for the next-generation Internet.

As NEBSA/CTN note, the “existing regulatory model governing the 2.5 GHz band has resulted in powerful public-private partnerships that benefit educators, students, commercial wireless service providers, and consumers.”<sup>3</sup> Undoubtedly, flexible use rules for EBS have resulted in robust broadband networks and enhanced educational services. Within SFL’s license areas, we use EBS spectrum to serve underserved schools and learning centers, and our lease partnerships give us access to equipment and services toward that mission. For example, in Maryland, we partner with Baltimore City Schools’ Home and Hospital Program serving more than 3,000 students annually who are unable to attend school due to illness or hospitalization or emotional crisis. We provide BCSHHP with mobile devices to support their teachers and students participating in the program. In Texas, we work with the San Antonio Independent School District to provide devices to high school teachers to support their access to virtual professional development opportunities and to school libraries providing broadband device checkout services for students lacking broadband access at home. As EBS rules have transitioned over the years, so have our services and we believe, our impact to education. Continuing to allow education to

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<sup>3</sup> NEBSA/CTN Comments at 18.

hold a 'seat at the spectrum table' empowers education to not only benefit from, but also contribute to, a broadband regulatory framework that will continue to strengthen capacity building, benefiting not only consumers but society at large.

### ***Conclusion***

As NEBSA/CTN have stated, EBS does not need fixing, it needs finishing. SFL urges the FCC to preserve the educational success in this band and to retain the fundamental educational purpose behind EBS.

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