September 20, 2017

Ajit Pai

Chairman

Federal Communications Commission

445 12th St., S.W.

Washington, D.C. 20554

**RE: Thirteenth Section 706 Report Notice of Inquiry (GN Docket No. 17-199)**

Dear Chairman Pai:

Thank you for the opportunity to comment on the Thirteenth Section 706 Report Notice of Inquiry. The State Educational Technology Directors Association (SETDA) provides the comments below, related to Section II(D) - Schools and Classrooms, to support the deployment of advanced telecommunications capability to schools and classrooms

SETDA is the principal membership association representing U.S. state and territorial digital learning leaders that serves and supports the emerging interests of our members with respect to the use of technology for teaching, learning, and school operations. SETDA has a strong history of promoting equity of access to the Internet in schools by advocating for the availability of affordable, high capacity broadband. Equitable, robust broadband is essential for all students Limits on bandwidth capacity undermine choices about which digital instructional materials and educational applications students and educators can effectively use. Dependable access to high-speed broadband also remains imperative for basic state mandated college- and career-readiness activities, such as the administration of high-stakes online tests (e.g., PARCC and SBAC) and supporting college-entrance exams (e.g., SAT). Shifts to cloud-based core operational and administrative services (e.g. student information and data systems, human resources, finance, payroll, transportation, nutrition, library services, security surveillance, HVAC, and technology wireless and network management, etc.) are also increasing K-12 broadband demands, and require high quality, reliable broadband access.

As part of the E-rate Modernization Order, the FCC adopted SETDA’s broadband targets of 100 Mbps per 1,000 students and staff (2015/16) and 1Gbps per 1,000 students and staff (2017/18). These important targets are outlined in *The Broadband Imperative: Recommendations to Address K-12 Education Infrastructure Needs.[[1]](#footnote-1)* SETDA recently updated the targets, published as part of *The Broadband Imperative II: Equity of Access for Learning*.[[2]](#footnote-2) The updated targets are meant, however, to help schools and districts understand better the broadband levels required to adopt dynamic, personalized instructional models that leverage digital tools, applications, and content. For those that have not made the digital shift, the targets would exceed their needs and we do not recommend that the FCC, or the Universal Service Administrative Company, use the new benchmarks to implement the E-rate program.

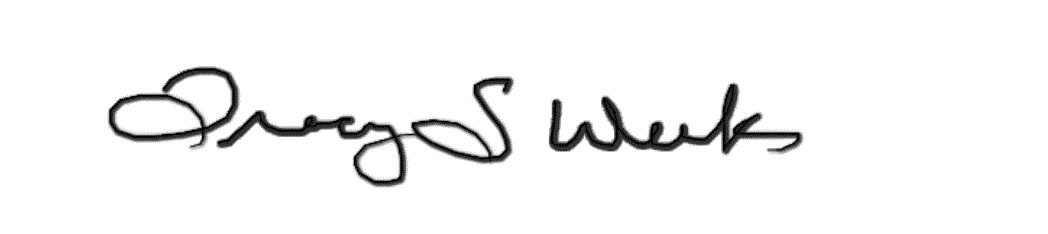
**Recommendations**

*The FCC’s current broadband goals should stay in place, with all educational stakeholders helping more districts reach those goals through a focus on scalability, access, and affordability.*

* ***Scalability:*** As districts plan and build new infrastructure, they need the flexibility to scale up to the FCC’s current broadband goals. Granting districts the ability and resources to scale to the current benchmarks will allow them to pay for the bandwidth that is needed now, with the ability to increase access later as dictated by their instructional and other needs.
* ***Access and Affordability:***There are still many parts of the country — often in remote regions, but frequently in suburban and even urban settings — that lack robust, affordable broadband. In such communities, schools struggle to meet the current and expected educational broadband goals. Because of these challenges, we recommend that the FCC work with providers to make affordable broadband available to all schools through both fixed and mobile services. Ensuring both delivery options are available is critical to meeting educational needs. We urge the FCC to continue supporting state and local leaders’ efforts to strengthen the communications infrastructure serving the nation’s schools, consistent with Section 706’s traditional vision, with a particular focus on better meeting the needs of un-served and underserved areas. For further information about notable work underway in the field, we encourage you to review the innovative State leadership activities detailed in the 2016 report, *State K-12 Broadband Leadership.[[3]](#footnote-3)*

Thank you for carefully considering these recommendations and our additional shared recommendations made through EdLiNC. Our members look forward to continuing to work with the FCC to ensure all students’ have access to robust broadband and the learning opportunities it creates.

Sincerely,



Tracy S. Weeks, Ph.D.

Executive Director

1. The *Broadband Imperative* is available on SETDA’s website: <http://www.setda.org/priorities/equity-of-access/the-broadband-imperative/> [↑](#footnote-ref-1)
2. The *Broadband Imperative II* is available on SETDA’s website: http://www.setda.org/priorities/equity-of-access/broadband-imperativeii-2016 [↑](#footnote-ref-2)
3. The State Broadband Leadership report is available on SETDA’s website: http://www.setda.org/priorities/equity-of-access/statek12broadbandleadership/ [↑](#footnote-ref-3)