



HARVARD GRADUATE SCHOOL OF EDUCATION

September 7, 2013

To the Commissioners and Staff of the Federal Communications Commission:

We are writing to advocate that the FCC's E-Rate Program be expanded to cover mobile devices and 3G/4G wireless connectivity. Currently, the E-Rate program does not cover the purchase of mobile devices or connectivity off school grounds. However, to a great extent, learning now takes place on mobile devices (smartphones, tablets, and e-readers). These devices, when used on 3G/4G networks, enable students to learn at home, on the bus going to or from school, or wherever they happen to be. That said, many parents cannot afford to buy a device and connectivity for each child, and schools lack the funding to provide devices and connectivity. Absent federal support, low income students will not be able to take advantage of these 21st century capabilities.

In 2010, the FCC's National Broadband Plan called for modernization of the E-Rate to cover mobile devices and off-campus connectivity. Later that year, the FCC launched its Learning on the Go Program, which provided funding for mobile devices and off campus mobile broadband connectivity in 20 pilot projects. Simultaneously, the 2010 National Educational Technology Plan, issued by the US Department of education, highlighted the importance of mobile, life-wide learning and recommended expansion of the E-Rate program to accomplish this. Two faculty members from the Harvard Graduate School of Education, including a co-signer of this letter (Dede), were part of the Technical Working Group for that Plan and strongly endorsed this recommendation.

More recently, however, the FCC issued a Notice of Proposed Rulemaking, focusing on funding fiber deployment within schools and community centers and providing only Wi-Fi connectivity at these locations. Under this proposal, there would not be any funding either for mobile devices or for off-campus 3G/4G connectivity.

We believe that this proposed rulemaking is a mistake. It makes erroneous assumptions about digital infrastructure, models of schooling, and informal learning, reverting to hardwired networking and large computers that limit learning to the school day and place. More affluent students and parents can overcome this limitation by supplementing with mobile devices and 3G/4G networks, but low-income families cannot. In direct contradiction to the purpose of the E-Rate, the FCC's proposed rulemaking will widen, not narrow, the digital divide that contributes to the pernicious achievement gap in education. This in turn has negative consequences not only for low-income students and families, but for all of us in terms of economic development and democracy.

For these reasons, we urge that the FCC change direction on its intended E-Rate limitations and return to the modernization policies exemplified by its own Learning on the Go program. Thanks for considering our recommendation.

Sincerely,

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James E. Ryan
Dean