

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

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	

Comments of the Consortium for School Networking

The Consortium for School Networking (CoSN) is the premier professional association for school district technology leaders. CoSN empowers educational leaders to leverage technology to create and grow engaging learning environments. For over two decades, CoSN has provided local education leaders with the management, community building, and other capacities essential for using technology and broadband services to transform learning for all students. Today, the CoSN community represents nine million students in school districts nationwide and continues to grow as a voice for effectively using technology to dramatically improve teaching and learning.

We are writing to respond to the Wireline Competition Bureau’s request for public comment on the Federal Communications Commission’s (Commission) Lifeline and Linkup Reform and Modernization Further Notice of Proposed Rulemaking (FNPRM).¹ CoSN strongly supports the Commission’s proposal to use Lifeline as a mechanism for ensuring that all students, and their families, have access to broadband services. We urge the Commission to use every tool at the agency’s disposal, including the Lifeline program, to connect the nation’s low income families to the telecommunications services required to

¹ Lifeline and Linkup Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order. FCC 15-71

engage fully in their communities, with employers, and especially with the nation's schools, which provide a pathway to well-paying jobs and improved life opportunities.

Home Internet Access is an Increasingly Important Educational Tool and the Commission should Update the Lifeline Program to Include Broadband Services

CoSN agrees with the Commission's assessment of home Internet access's vital importance to teaching and learning and urges the agency to update the Lifeline program to include broadband access. Enabling all students to meet states' rigorous college and career ready standards, including equipping them with both deep content knowledge and the skills required for postsecondary success, will require new learning tools and support structures. As the Commission noted, students often require Internet access to complete homework assignments, as well as to take advantage of blended learning, virtual learning, course choice, and other digital learning opportunities.

School districts recognize this need, but too often are not able to provide out-of-school access at scale to their students. The problem is pronounced for poor and rural families. CoSN's 2nd Annual E-rate and Infrastructure Survey showed that 82% of districts are not providing any type of off campus Internet services for their students.² A small number of survey respondents said they offer off-campus Internet connectivity programs, such as free or subsidized home access for low-income students, making community and business WiFi hot spots available for students, and deploying district owned personal hot spots.³ These discrete district connectivity initiatives are laudable, but significantly greater federal, state, and local leadership is needed to connect all students to the Internet when they are not on school grounds.

² *2nd Annual E-rate and Infrastructure Survey*, Consortium for School Networking in Partnership with AASA, and MDR. (2014), p. 22.

³ *Id* at p. 22.

Schools are also increasingly using high quality digital materials, including rich, adaptable open educational resources, to replace costly and too often outdated print materials. Realizing digital materials' full potential to improve student outcomes – including through rich, engaging interaction and cultivating student content development – will require expanded Internet access at school and outside school, including most importantly greater broadband access at home. District technology leaders responding to CoSN's 2015 IT Leadership Survey said they expect their district's instructional materials to be at least 50% digital within the next three years.⁴ Digital content penetration may expand even more quickly in some jurisdictions, as states such as Indiana, Utah, Kentucky and North Carolina and others, implement leading-edge digital content policies.⁵ Many low-income, and rural, families will not be able to benefit fully from this important transition. Expanded Internet access is needed to support state and district transitions to digital content and other education policy reforms, so the Commission's effort to update the Lifeline program is timely and important.

Additional Spectrum Should be made Available for Delivering Out-of-School Internet Access to Low Income Communities

CoSN agrees with the FNPRM's assessment that unlicensed and licensed spectrum is a significant "community and educational asset," and urges the Commission to provide additional spectrum for improving out of school broadband access.⁶ For example, additional unlicensed spectrum would better enable school districts to provide WiFi connectivity to students living near school facilities. Spectrum experts have shown that

⁴ *2015 K-12 IT Leadership Survey Report*, Consortium for School Networking in partnership with MDR.

⁵ *State Digital Learning Exemplars Highlights from States Leading Change through Policies and Funding*, State Educational Technology Directors Association. (May 2015)

⁶ FNPRM, para. 130.

additional contiguous bands would benefit these types of ubiquitous, indoor/outdoor WANs.⁷ According to WiFi Forward (a coalition of companies, organizations and public sector institutions), unlicensed spectrum also “supports the launch of innovative business models...[such as] Wireless Internet Service Providers (WISPs) [that] provide access to broadband services, particularly in rural and hard-to-serve areas.”⁸ Providing additional spectrum will create new opportunities for such innovations, which in turn should help communities, including rural communities, identify and deploy new, lower cost, solutions for promoting out-of-school broadband access. Additional unlicensed spectrum could also decrease the costs schools pay for existing home WiFi connectivity initiatives - through the availability of a greater range of service options and technologies - such as deploying district-owned WiFi hot spots and providing student access to community and business WiFi hot spots.

The Commission should Consider Testing a Community Wide Eligibility Model to Reduce Administrative Burdens and Maximize the Program’s Impact

CoSN supports the Commission’s effort to maximize Lifeline participation by eligible households, while also reducing administrative burdens on providers charged with verifying low-income consumer’s eligibility and taking steps to reduce the likelihood of waste, fraud and abuse. Administrative costs, particularly expenses associated with eligibility determinations, often disproportionately consume time and resources that would otherwise be focused on achieving a program’s core objective. This challenge is not unique to the Lifeline program, and Congress has authorized other federal agencies to explore innovative strategies for minimizing administrative burdens and maximizing outcomes.

⁷ The Next Gen Classroom: Spectrum Policies for the 21st Century School, Bill Maguire (November 2014). p. 21

⁸ *Assessment of the Economic Value of Unlicensed Spectrum in the United States*, Telecom Advisory Services, LLC. (February 2014). Commissioned by the WiFi Forward coalition.

With this goal in mind, CoSN urges the Commission to examine other federal program eligibility models, with a particular focus on approaches like the Community Eligibility Provision established by the Child Nutrition Act (P.L. 111-296), which could serve as the basis for a new Lifeline community eligibility initiative. The CNA's Community Eligibility Provision allows high-poverty schools to offer breakfast and lunch to all students in schools with 40 percent or more "identified students." Identified students include children who are directly certified (through data matching) for free meals because they live in households that participate in the Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, or Food Distribution Program on Indian Reservations, as well as children who are certified for free school meals without submitting a school meal application because of their status as being in foster care, enrolled in Head Start, homeless, runaway, or migrant students.⁹

The Community Eligibility Provision lessens administrative work, increases program participation, and has improved the financial viability of nutrition programs through increased revenues and cost reductions associated with economies of scale. Testing and further exploring a Lifeline community eligibility model could provide insights and evidence about the wisdom and viability of scaling such an approach nationally.

School Districts could play a Role in Making Eligible Households Aware of the Lifeline Program

Schools serve as important anchor institutions in their communities and could provide an additional platform for notifying high poverty families about their potential eligibility for the Lifeline program. Although schools should not be required to provide such information as a condition of participating in the E-rate or other programs, interested

⁹ *FRAC Facts Community Eligibility Provision: An Amazing New Opportunity*, Prepared by the Food Research and Action Center. http://frac.org/pdf/community_eligibility_amazing_new_option_schools.pdf

schools – particularly schools serving the highest concentrations and numbers of students living in poverty, including high poverty rural areas - could be equipped with high quality information about the program and encouraged to distribute it in their communities as part of existing family engagement initiatives.

This approach could be particularly impactful for schools seeking strategies for supplementing or strengthening education technology initiatives through increased home based Internet connectivity rates and greater access to high-speed services. High poverty schools are readily identifiable based on their participation in existing federal education, nutrition and other programs focused on low income families and they could serve as the basis for a communications initiative about the reformed Lifeline program.

Thank you for carefully considering our recommendations. CoSN strongly supports the Commission’s work to update the Lifeline program and promote digital equity.

Respectfully submitted,

Consortium for School Networking (CoSN)

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