

April 30, 2020

Unprecedented times have unfolded through the COVID-19 national emergency, with our most vulnerable communities exposed to its harmful impact. As K-12 public education systems shifted to virtual learning in order to support students through the pandemic, inequities in internet access became amplified. In our Dallas County community, **25% of households with children lack high-speed broadband internet**. This is concentrated in **just 10 of our 92 zip codes with higher percentages of children living in poverty**. Dallas County is the 2nd largest county in Texas and 9th largest county in the United States, emphasizing the need for a solution to this gap.

This crisis is not unique to communities in Dallas County. Per U.S. Census data, **1.3 million (~17%) of the 7.3 million households with children in Texas do not have broadband subscription, with 800,000 of these households located in just 10 of Texas's 254 separate counties**. The most significant numbers are in the large metro urban counties, but the largest percentage of households without broadband are concentrated in the Rio Grande Valley and select rural counties. Our state's primary challenges are low subscription rates due to cost and insufficient household credit to purchase the service. Prior to COVID 10, a Pew research report cited nearly 60% of eighth graders in the United States used the internet to do homework every or nearly every day. Barriers to internet access existed even under "normal" conditions. The FCC has a unique opportunity to make a vast impact ensuring public education can continue and improve by pursuing equity and excellence during these trying times.

We urge the FCC to consider these recommendations regarding current E-Rate rules:

1. **Permanently allow schools and libraries to extend their networks beyond campus boundaries.** There is precedence for this with the FCC's "[Learning-On-The-Go](#)" pilot from 2011.
2. **Permanently allow the use of school networks for families, not just students, at or below the poverty line so that parents can support learning for their students and themselves.** This would be an extension and expansion of order [DA-20-234](#).
3. **Allow use of E-Rate dollars for building community wireless networks in underserved neighborhoods.** E-Rate funding allows school districts and libraries to build private networks (i.e.: fiber) to a campus, but those networks are limited in how, who and when that capacity can be used. Implementing a point-to-multipoint wireless network can leverage both district property and existing digital infrastructure to create neighborhood hotspots for students and parents to use 24x7. E-Rate rules need to allow for multiple uses of existing infrastructure. Eligible service lists need to be expanded to include radio antennas and receiver devices for each home.
4. **Allow E-Rate funds to be used for cellular data plan subscriptions for students.** This will allow students to participate in distance learning programs during the COVID-19 pandemic and any similar future events. This also provides for student success in homework, research, and applications for higher education and employment.
5. **Allow Category 2 E-Rate funds to be pooled across campuses to improve equity outcomes.** Some schools require more investment than others to bring technology infrastructure to modern standards. Allowing Category 2 budgets to be pooled and shifted within the overall district authorization limit speeds improvement at campuses with the most need without impacting overall E-rate investment.

The FCC is positioned to meet this urgent need through the long-established E-rate program to help alleviate the needs of our most vulnerable communities. The decisions made now will not only mitigate current disruption but will also have a profound effect on the future of all K-12 public and private education systems to ensure equity as a top priority. Thank you for considering these recommendations.

Respectfully,