



March 21, 2024

SUBMITTED ELECTRONICALLY VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Ex Parte Filing

Addressing the Homework Gap Through the E-Rate Program, WC Docket No. 21-31

Dear Madam Secretary:

Pursuant to Federal Communications Commission’s *ex parte* rules, I hereby submit the following summary of our March 19, 2024 conversation with Allison Baker, Johnnay Schrieber, Jodie Griffin, Molly O’Connor, Veronica Garcia-Ulloa, and Kate Dumouchel of the Wireline Competition Bureau (“WCB”) to discuss considerations for the Commission’s Notice of Proposed Rulemaking regarding E-Rate support for Wi-Fi hotspots for remote learning (Proposal).¹

The following individuals from the Schools, Health & Libraries Broadband Coalition (collectively “SHLB”) participated in the call: John Windhausen, Jr., Executive Director, SHLB Coalition, Kristen Corra, Policy Counsel, SHLB Coalition, Kristin Humphries, Superintendent, East Moline School District 37, Branson Rasko, CTO, East Moline School District 37, and Al Brown, CEO, SmartWAVE Technologies.

SHLB applauds the Commission’s proposal to close the Homework Gap by allowing E-rate support for wireless Internet services to assist with remote learning. Such support could dramatically improve participation in online education for students and library patrons. SHLB additionally recommends that, rather than limiting funding to support only commercially available Wi-Fi hotspot devices and mobile carrier service, the Commission should allow funding for any wireless service that provides comparable Internet access if it is the most cost-effective option.² This includes broadband service and devices that E-rate applicants themselves deliver off-campus, which could provide cost savings to the E-Rate program and better service for many areas.

¹ Addressing the Homework Gap Through the E-Rate Program, WC Docket No. 21-31, Notice of Proposed Rulemaking, FCC 23-91 (rel. Nov. 8, 2023).

² See generally Comments of The Schools, Health & Libraries Broadband Coalition and The Open Technology Institute at New America, WC Docket No. 21-31 (filed Jan. 17, 2024).

Kristin Humphries and Branson Rasko of the East Moline School District 37 (located in East Moline, Illinois) discussed the district's deployment of a mesh Wi-Fi network into the surrounding community. They discovered during the Covid-19 pandemic that many families could not afford Internet service and that the vast majority of Chromebooks they handed out wouldn't work with hot spots due to poor mobile coverage. They worked with SmartWAVE Technologies to purchase access points and placed them on top of existing infrastructure like streetlights. All students are given a Chromebook, which then automatically connects to the network wherever they are situated. Filtering is done directly from the device and the service is free for all students. They explained that this model is akin to extending its existing school Wi-Fi network and devices into the community, which is much easier for their six-person IT department to manage, compared with tracking the service and devices provided by traditional mobile carrier hotspots. Also, unlike traditional hotspots (where the provider controls the network) East Moline's network allows the district much greater control; the IT department can control network access, diagnose problems, and "see" how the network is running and being used.

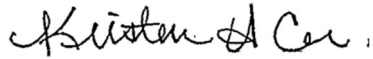
The district has completed two out of nine total phases of its project. It has placed approximately 597 access points on streetlights (half of what they plan to deploy) and has connected about 300 students. By June 30, they anticipate to be fully running with 4,000 – 5,000 students accessing the network. They estimate that the cost of running the network is about \$14/student per year, providing speeds varying from 10/10 Mbps to 100/100 Mbps depending on a user's proximity to the nearest access point. They anticipate that they will see a fast adoption rate because students' devices will automatically connect to the network (with the access point acting as the "hotspot"), rather than requiring them to connect to an individual hotspot device they carry home. If E-rate allows funding for functionally equivalent hotspot service and devices, like the access points East Moline uses, they believe that more districts would be encouraged to adopt similar self-deployment models.

Al Brown of SmartWAVE Technologies has worked with other school districts in various parts of the United States, including Council Bluffs, Iowa and East San Jose, California, to create self-deployed broadband networks. He explained that there is never a "one size fits all" technology solution to solve the needs of every community. Whether a device uses fixed wireless, CBRS, or some other solution, it provides a Wi-Fi signal. He also exclaimed that when we find ways to provide connectivity to students, we make an investment in our future.

Providing E-Rate applicants flexibility to choose the most cost-effective service that suits the needs of their communities can better ensure that the Commission's Proposal does not inadvertently leave behind students or library patrons most in need of broadband access. SHLB thus urges the Commission to broaden the scope of eligible "hotspot" devices and services so that applicant-enabled networks, including the deployment of Wi-Fi access points and other equipment, can be eligible for E-rate funding and included as an option for schools and libraries.

We believe this technology can be much less expensive and connect many more students than traditional hot spots,³ which aligns with E-rate’s current cost-effectiveness structure.

Sincerely,



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³ A study conducted by Columbia University economist Raul Katz explained that “the indefinite purchase of monthly service through a commercial ISP is less cost-effective and financially sustainable than the other deployment options where they are feasible.” Dr. Raul Katz, *The “To and Through” Opportunity: An Economic Analysis of Options to Extend Affordable Broadband to Students and Households via Anchor Institutions*, at 6 (August 2022), available at <https://www.shlb.org/uploads/Policy/Raul%20Katz%20Economic%20Study.pdf>