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

In the Matter of	)	
	)	
Using E-Rate Funding to	)	WC Docket No. 21-31
Support Remote Learning	)	

COMMENTS OF INTERNET ASSOCIATION SUPPORTING THE USE OF E-RATE FUNDS FOR REMOTE LEARNING DURING THE COVID-19 PANDEMIC

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EXECUTIVE SUMMARY

Amidst the current COVID-19 public health crisis, the importance of the E-Rate program has never been more important. Schools are looking for ways to provide their students with access to the necessary educational resources when they are outside of the classroom or "off campus" and states are continually looking for solutions to ensure that their students are able to continue learning in a virtual environment and that no student is left behind as our nation experiences a once in a lifetime pandemic. IA member companies recognize the value of education and know that in order for students to succeed they need access to modern day necessities such as broadband connectivity or mobile internet access. IA member companies are supportive of the Federal CommunicationsCommission's (FCC) interest in updating the E-rate program rules and the potential expansion of eligible services and equipment permitted for funding under the E-Rate program.

The expanded use of E-Rate funds for remote-learning opportunities now that we have entered the age of the "virtual" campus would allow for the program to adapt for modern educational needs. IA would encourage the FCC to use its authority to permit the necessary infrastructure, hardware, and software tools to be considered eligible services under the E-Rate rules to enable every student the same opportunity to learn, regardless of how far they live from campus or their available forms of transportation.

Whether installing antennas, routers, wireless access points, or other tools to

provide students with needed broadband or mobile internet access, E-Rate funds should be used to adopt both hardware and software solutions that enable students, teachers to successfully access the internet for educational purposes.

More specifically, E-Rate eligible services list and E-Rate eligibility criteria should be modified to include cloud computing services. Cloud computing services that support broadband internet are fundamental to remote and online learning, and schools should be allowed to use E-Rate funds for these services. Given the urgency and importance of online learning during the pandemic, the Commission should consider expediting rule changes with respect to new services that may be eligible for E-Rate.

The Commission should also assess additionally eligible services for the E-Rate program by looking to see how they can assist students in the present and how those services will create an overall better learning experience for students moving into the future. E-Rate funds should be used to expand internet access to students during socially distanced learning; and, in those instances where cloud-based services will reach more students, E-Rate funds should be used to support the cloud-based delivery of educational services.

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Internet Association ("IA") appreciates the opportunity to provide comment on the Federal Communications Commission's ("FCC") Wireline Competition Bureau's ("The Bureau") *Public Notice*, "Addressing the Homework Gap Through the E-Rate Program".[1]

IA is the only trade association that exclusively represents global internet companies on matters of public policy.[2] IA's mission is to foster innovation, promote

[1] *Wireline Competition Bureau Seeks Comment on Petitions for Emergency Relief to Allow the Use of E-Rate Funds to Support Remote Learning During the COVID-19 Pandemic*, Public Notice, WC Docket No. 21-31, (WCB Feb. 1, 2021), https://docs.fcc.gov/public/attachments/DA-21-98A1.pdf (hereinafter "Addressing the Homework Gap Through the E-Rate Program"). *See also* Petition for Expedited Declaratory Ruling and Waivers filed by the Schools, Health & Libraries Coalition, et al., WC Docket No. 13-184 (filed Jan. 26, 2021), https://www.fcc.gov/ecfs/filing/101260036427898 (SHLB Petition); Petition for Waiver on behalf of the State of Colorado, WC Docket No. 13-184 (filed Sept. 2, 2020), https://www.fcc.gov/ecfs/filing/10902218280692 (Colorado Petition); Letter from Elaine Wynn, President of Nevada State Board of Education, to Chairman Pai, FCC, WC Docket No. 21-31 (filed Aug. 10, 2020), https://www.fcc.gov/ecfs/filing/108212219529231 (Nevada Petition). The SHLB Petition was submitted by SHLB; American Library Association; Consortium for School Networking (CoSN); National School Boards Association (NSBA); State Educational Technology Directors Association (SETDA); State E-Rate Coordinators' Alliance (SECA); Urban Libraries Council (ULC); Wireless Futures Project, Open Technology Institute at New America; and Wisconsin Department of Public Instruction.

[2] IA represents the interests of companies including: Airbnb; Amazon; Ancestry; Discord; DoorDash; Dropbox; eBay; Etsy; Eventbrite; Expedia Group; Facebook; Google; Groupon; GrubHub; Handy; IAC; Indeed; Intuit; LinedIn; Lyft; Match Group; Microsoft; Notarize; PayPal; Pinterest; Postmates; Quicken

economic growth, and empower people through the free and open internet. IA believes the increased internet access creates unprecedented opportunities for students of all ages throughout the learning process. As the voice of the world's leading internet companies, many of our members contribute to help close the digital divide and support efforts that seek to provide equal opportunity and broadband access for all students in the modern, remote-first, digital era.[3]

The COVID-19 public health emergency has drastically changed the way all students are able to learn and educators are able to teach. For example, tutors, teachers, professors, and instructors have adapted their lesson plans and are utilizing virtual educational resources to deliver information, however, those resources are dependent upon access to internet connectivity. As a result of today's new normal, primarily providing broadband in a classroom or library for "educational purposes"[4] under the E-Rate program no longer meets the needs of students engaged in virtual learning. Therefore, it is imperative that the FCC address new ways of virtual learning and update how E-Rate funds are allocated and distributed.

During the COVID-19 pandemic, several requests have been made across the

Loans; Rackspace; Rakuten; Reddit; Snap Inc.; Spotify; Stripe; SurveyMonkey; Thumbtack; Tripadvisor; Turo; Twitter; Uber Technologies, Inc.; Upwork; Vrbo; Zillow Group; and, ZipRecruiter. IA's current member list is available at: https://internetassociation.org/our-members/.

[3] COVID-19 Response: Bridging the Digital Gap in Education, Internet Association, https://covid19.internetassociation.org/industry/response/education/ (last visited Feb. 16, 2021).

[4] Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Second Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 9202, 9208, para. 17 (2003) (Schools and Libraries Second Report and Order) (clarifying the meaning of educational purposes); 47 CFR § 54.500 (defining "educational purposes" as "activities integral, immediate, and proximate to the education of students"); Schools and Libraries Second Report and Order, 18 FCC Rcd at 9208, para. 17; 47 CFR § 54.500 (defining "educational purposes" in the case of libraries as "integral, immediate, and proximate to the provision of library services to library patrons.")

country[5] that convey the critical need for the FCC to allow E-Rate-funded services and equipment to be used "off-campus" to provide additional support for effective remote learning and future unforeseen disasters. All of the petitioners[6] that made requests to the FCC asked that the Commission expand E-Rate funds and the Eligible Services List (ESL)[7] to include support for any and all services and equipment necessary to expand broadband access and create mobile connectivity for students during the global health crisis. These changes would allow some states to provide up to 60 percent of students with access to sufficient internet connectivity if they live within two to their miles of their school.[8] Additionally, the changes would allow other schools to extend their existing broadband connectivity to create hotspots to reach their student population or allow for resources from the E-Rate fund to contribute to innovative mobile internet connectivity solutions, so students can have internet in their homes.[9]

While the American Community Survey of 2019 shows that 86.4 percent of American households have a broadband internet subscription[10], it is important to note that, just like "schooling is not learning", a "subscription is not access" to the internet.

[5] *See* Letter from Lyell Walker, State E-Rate Coordinator, Florida Department of Management Services, to Ajit Pai, Chairman, FCC, WC Docket No. 02-6, at 1 (filed Mar. 12, 2020); Letter from John Kraman, Chief Information Officer, Mississippi Department of Education, to Ajit Pai, Chairman, FCC, WC Docket No. 02-6, at 1 (filed Mar. 24, 2020); Letter from Matt Schmit, Director, Illinois Office of Broadband, to Ajit Pai, Chairman, FCC, WC Docket Nos. 13-184 et al., at 1 (filed July 2, 2020); Letter from Nevada State Board of Education to Ajit Pai, Chairman, FCC, at 2-3 (filed July 30, 2020) (Nevada Letter).
[6] *See* SHLB Petition; Colorado Petition; and Nevada Petition.
[7] *See* 2021 Eligible Services List (November 30, 2020), https://docs.fcc.gov/public/attachments/DA-20-1418A1.pdf.
[8] Nevada Petition at 2-3.
[9] *Using School Bus Wi-Fi to Support Distance Learning*, School Transportation News, (May 1, 2020), https://stnonline.com/partner-updates/using-school-bus-wifi-to-support-distance-learning/.
[10] *See* U.S. Census Bureau, American Community Survey 2019, Table ID R2801 (December 10, 2020), https://www.census.gov/acs/www/data/data-tables-and-tools/ranking-tables/

A Pew Research Center survey found that 17 percent percent of students lacked a *reliable* internet connection or computer to access the internet. Additionally, 35 percent — more than one out of three students — ended up resorting to using their cellphone to complete their homework.[11] Even more alarming, however, is the way this gap manifests across racial demographics. As the National Conference of State Legislatures (NCSL) recognized: "Black, Hispanic, and low-income students are more likely to try to complete schoolwork on a cell phone rather than a desktop or laptop computer."[12] Considering the fact a virtual campus is anything, but what is considered "off campus" under the E-Rate program during the pandemic, these numbers are disappointing and unacceptable, and it is all of our responsibilities to do more.

It is important that the FCC recognize the educational challenge of this moment, where a large part of the student population must adapt to virtual or social distance learning, and the Commission needs to do its part to help provide access to all students.[13]

[11] *See* Pew Research Center, "Nearly one-in-five teens can't always finish their homework because of the digital divide", (October 26, 2018), https://www.pewresearch.org/fact-tank/2018/10/26/nearly-one-in-five-teens-cant-always-finish-their-homework-because-of-the-digital-divide/

[12] *See* NCSL "Public Education's Response to the Coronavirus (COVID-19) Pandemic", (January 14, 2021), https://www.ncsl.org/research/education/public-education-response-to-coronavirus-covid-19.aspx

[13] *See* Education Tables, Table 2. Coronavirus Pandemic Impact on How Children Received Education for the 2020-2021 School Year, by Select Characteristics, U.S. Census Bureau (January 27, 2021), in which only 9.6 percent of the 51.5M households in the American public education system indicated "[t]he coronavirus pandemic did not affect how children in this household received education", https://www.census.gov/data/tables/2021/demo/hhp/hhp22.html.

I. E-RATE FUNDS SHOULD BE AVAILABLE TO SUPPORT NEW OR UPGRADED INFRASTRUCTURE THAT EXTENDS INTERNET CONNECTIVITY.

Currently, many public schools have the infrastructure to effectively support students and teachers who wish to access the internet and use modern educational resources on their campuses. However, now that many campuses have closed and switched to virtual learning models or are operating at limited capacities due to the COVID-19 pandemic restrictions, a single location for internet access is no longer able to serve the student population it once did. While the FCC has included a number of products, services, and network access tools in the ESL Glossary[14] for E-Rate funding, the Commission could not have predicted the swift spike in the need for "off campus" or other equipment and services due to the COVID-19 pandemic. Now, more than ever, it is important that the FCC allow for updates to the E-Rate program to provide all students with the opportunity to access their education while protecting themselves from the COVID-19 virus.

[14] *See* School and Libraries (E-Rate) Program Eligible Services List (ESL) Glossary (2020), https://www.usac.org/wp-content/uploads/e-rate/documents/ESL-Glossary.pdf.

As explained in Nevada's Petition, the state could "erect[] fixed wireless hotspots on the roofs of school buildings to allow students to take advantage of the robust fiber connection [within two to three miles of the school]," if the FCC would permit additional equipment and services to be added to the ESL for E-Rate funding.[15] Furthermore, for those school campuses that do not yet have broadband access, whether through fiber connectivity or otherwise, permitting the use of E-Rate funds to develop the infrastructure necessary to support such internet connectivity is a necessary first step towards bridging the digital divide and homework gap that further exist during a period of remote learning.

Therefore, the FCC should use its authority to permit those infrastructure tools necessary to extend current broadband access and provide the option for mobile internet connectivity to be eligible for E-Rate funding so we can offer every student the same opportunity to learn regardless of being on or off campus.

A. All hardware and software required to extend the range of broadband connectivity or provide mobile connectivity should be considered "eligible equipment and services", along with cloud services that support such hardware and software.

Whether installing antennas, routers, wireless access points, or other tools to provide students with needed broadband or mobile internet access, E-Rate funds should be used to adopt both hardware and software solutions that enable students

[15] Nevada Petition at 2.

and teachers to successfully access the internet for educational purposes. After activating the network, hardware and software solutions may also be used to ensure the network remains protected for the use of students, school faculty, and education administrators.

For example, the FCC could allow for advances of Virtual Private Networks (VPNs), password-protected Wi-Fi networks, and other cloud-based security and content technologies to be included in the ESL for E-Rare funding. This would allow state and local entities to furnish network enhancements that would ensure these extended networks that provide students with access to their classes and homework were used specifically for "educational purposes" and not uses that would fall outside of the E-Rate program.

B. The investment in new or upgraded infrastructure to support extended internet connectivity from schools is a "cost-effective purchase".

Per the Summary of the *Second E-Rate Modernization Order*, "the purchase of a fixed broadband connection and wireless local area network (WLAN) equipment is generally more cost effective than the purchase of individual data plans for every student or library patron."[16] As a result of allowing new tools to be added to the ESL, schools will be able to embrace modern infrastructure, hardware, and software solutions to extend and continue to build a long lasting connectivity for their students.

[16] *See* Summary of the Second E-Rate Modernization Order (December 11, 2014), https://www.fcc.gov/general/summary-second-e-rate-modernization-order.

The FCC should make the necessary updates to the E-Rate program's ESL funding requirements to activate the needed complex and timely solutions for the 2021 school year, with the appropriate support to ensure these fixes do not end up becoming "legacy IT" or some other form of forgotten infrastructure. It is essential that school districts be given the capability to use E-Rate funds to continuously upgrade this infrastructure, ensuring states are ready for the next pandemic, natural disaster, or other major disruptive event that will necessitate extended periods of remote operations.

II. CLOUD-BASED REMOTE LEARNING OPTIONS ARE AVAILABLE IMMEDIATELY VIA CELLULAR SERVICES FOR THOSE NOT IN REACH OF A QUALIFYING PHYSICAL INFRASTRUCTURE.

In 2014, as Acting Chairwoman Rosenworcel presciently noted in her statement accompanying the *Second E-Rate Modernization Order*[17] — six years prior to our current global health pandemic — "it has become time to wind down analog-era education. The teaching tools so many of us knew in class years ago — from the blackboard to the bulky textbook — are no longer the only essential instruments of education [because] connected devices are changing every aspect of our lives."

Put even more simply, and to borrow a line from The World Bank, "[s]chooling is not learning."[18] Just because most primary-aged children are enrolled in schools, it

[17] *See* Statement of Commissioner Jessica Rosenworcel, FCC-14-189A4 (December 19, 2014), https://www.fcc.gov/document/fcc-releases-order-modernizing-e-rate-21st-century-connectivity
[18] *See* World Bank, World Development Report 2018: Learning to Realize Education's Promise. Washington, DC: World Bank, (October 2, 2017), https://www.worldbank.org/en/publication/wdr2018

does not mean they are learning what they need to succeed in the digital era. So much of this is because we are not only struggling to meet our students where they are physically, but we are also falling short when it comes to teaching them with the tools they know and learn from today.

It should come as no shock that most students, whether in K-12 or in the post-secondary school system, use and are comfortable with mobile devices. According to a Common Sense Media Survey, roughly 53 percent of kids in the United States have a cell phone by age 11.[19] Americans now more than ever before are living in a digitally driven world, and as then-Commissioner Rosenworcel stated in her 2014 speech, "the combined power of mobility and cloud computing means we can take [educational] content with us where we go" and American students of *today*, the digital-era, know that better than anyone else.

By way of example, the State of Florida is leading the way and has fully embraced that concept, having built on its experiences of regular long-term interruptions to the school year resulting from hurricanes. The state, in response to COVID-19, fully embraced the use of cloud-based tools as well as cloud-based delivery of educational resources. Florida established a series of best practices for a

[19] *See It's a Smartphone Life: More Than Half of U.S. Children Have One*, NPR, https://www.npr.org/2019/10/31/774838891/its-a-smartphone-life-more-than-half-of-u-s-children-now-have-one (last visited Feb. 16, 2021) (citing the Commons Sense Census: Media Used by Tweens and Teens, 2019).

distance learning program[20] from its 22-year old Florida Virtual School (FLVS)[21], a program that has been recognized both nationally and internationally for its utility during the COVID-19 pandemic.[22] The program was especially praised for its help with the most vulnerable of students — those who have no access to broadband and no ability to get close enough to campus to access the internet, instead relying on their cellphones to keep up with their studies.

This cloud-based software delivery of educational services in a mobile-friendly fashion is more important today due to our technology rich environments. In fact, when analyzing pre-pandemic data from the 2018 National Assessment of Educational Progress (NAEP)[23], Pew Research Center found that 58 percent of students use the internet to do their homework everyday.[24] Going forward, the number of students relying on mobile internet access will undoubtedly be much higher than the 58 percent simply because of advances in technology and further closing of the digital divide, not just because of pandemic-based school closures.

As explained below, in order to ensure every student receives the same education, the same opportunities, and the same care, mobile-friendly and

[20] *See* Florida Department of Education, Best Practices for Distance Learning (accessed February 6, 2021), http://www.fldoe.org/em-response/distance-learning.stml
[21] *See* Florida Virtual School, (accessed February 6, 2021), https://www.flvs.net/
[22] *See, e.g.,* Politico, "Which states had the best pandemic response?" (October 15, 2020), https://www.politico.com/news/2020/10/14/best-state-responses-to-pandemic-429376; FLVS Awards (accessed February 6, 2021), https://www.flvs.net/about/awards
[23] *See* 2018 NAEP Technology & Engineering Literacy (TEL) Report Card (April 30, 2019), https://www.nationsreportcard.gov/tel/
[24] *See* Pew Research Center, "As schools close due to the coronavirus, some U.S. students face a digital 'homework gap'", (March 16, 2020), https://www.pewresearch.org/fact-tank/2020/03/16/as-schools-close-due-to-the-coronavirus-some-u-s-students-face-a-digital-homework-gap/

cloud-based services should become "eligible services" for E-Rate funding, so that they can be made available to all students being served by public schools and libraries. These tools should particularly extend to those students that cannot access fixed broadband access or proposed hotspot areas.

A. Cellular service-accessible Anything-as-a-Service (XaaS) model should be included in the list of eligible E-Rate equipment and services due to the U.S. population's increasingly mobile world.

Mobile devices and technology are nothing like they were in 2014 when the FCC adopted the *Second E-Rate Modernization Order*, therefore IA would recommend that the FCC adapt its E-Rate program rules to include new technologies and resources such as cloud to be "eligible services" for E-Rate funding. In 2014, 89 percent of Americans had a cellphone, with only 59 percent of those being smartphones. Five years later, in 2019, the number of Americans with a cell phone exceeds 96 percent and 91 percent of those phones are a "smart" device.[25]

Additionally, smartphones and smartphone users utilize data far more than they ever have before.[26] As of December 2019, U.S. households had a total of 114 million fixed broadband subscriptions, but 490 million mobile broadband subscriptions.[27] By

[25] *See* Pew Research Center, Mobile Fact Sheet, *supra.*
[26] *See* Ericsson Mobility Report November 2020, Figure 11: Global mobile network data traffic and year-on-year growth ([Exabyte] per month), (November 30, 2020), https://www.ericsson.com/4adc87/assets/local/mobility-report/documents/2020/november-2020-ericsson-mobility-report.pdf
[27] *See* Organization or Economic Co-operation and Development (OECD), Broadband Portal (July 2022), https://www.oecd.org/sti/broadband/broadband-statistics/https://www.oecd.org/sti/broadband/broadband-statistics/

2026, it is anticipated that there will be 340 million mobile broadband subscribers using 5G technology, and that number will account for 80 percent of all mobile subscriptions in the nation.[28] These statistics demonstrate that the U.S. is moving towards a more mobily connected world, and as such, the FCC should update its E-Rate funding services to include more modern technologies like cloud-based services.

It is evident that cellular services utilizing data will be the primary way in which educational materials are developed and shared with students in the years to come, whether on a physical campus or a virtual one. E-Rate funds should support whatever is necessary to provide students with the ability to access the internet via their cellular phones and other mobile devices to take advantage of cloud-based educational material. Especially for those significant numbers of students who need internet access and live 10 miles or further from a public school or library. Cellular services may be the only way for students to access data and applications hosted on the cloud, and will often be the only way in which students can obtain an education, not just the most "cost-effective" way.

B. The pay-as-you-go business model adopted by XaaS is the most "cost-effective purchase".

As the summary of the *E-Rate Modernization Order* makes clear, it is a goal of

[28] *See* Ericsson Mobility Report November 2020, Figure 4: Mobile subscriptions by region and technology (percent) *supra.*

the program to "[m]aximiz[e] the cost-effectiveness of E-Rate spending".[29] Beyond reducing the contribution burden required, the FCC aims to ensure the benefit of every dollar spent is focused on helping students. As part of this effort, the FCC is working to "transition support away from legacy services." To do this, the FCC must adopt the necessary policy to allow the use of E-Rate funding on cloud-based educational services. As a result, the FCC should permit and even encourage the consumption-based model of XaaS educational delivery methods.

Legacy services from the analog-era of education also follow a legacy business model. Whether measuring work on an hourly basis or a fixed rate, they will be delivered at an increment that may not actually represent the work that was truly done. The consumption-based XaaS payment model, on the other hand, is the most transparent pricing model available today. Beyond being analogous to a school or library leasing fiber, XaaS, especially Software-as-a-Service (SaaS), involves the provider of the service owning, operating, and maintaining the network and infrastructure necessary to deliver the services. Therefore, E-Rate funds will only be used towards educational services *actually* delivered as opposed to those *theoretically supposed* to be used. Thus, making cloud services an innovative tool to access important education tools, but also a cost-effective solution that aligns with the FCC's goals of efficient use of E-Rate funds.

III. FUNDING AND PRIORITIZATION SHOULD BE BASED ON THE SOLUTION

[29] See Summary of the E-Rate Modernization Order, Goal 2, https://www.fcc.gov/general/summary-e-rate-modernization-order (accessed February 13, 2021)

THAT PROVIDES THE MOST USERS WITH INTERNET CONNECTIVITY IN THE SHORTEST PERIOD OF TIME.

Throughout the entire *E-Rate Modernization Order*, there is only one instance in which the word "prioritization" is used and the context of that usage is reiteration of a commitment to provide "applicants serving the highest poverty populations first access to funds".[30] As has been shown in study after study, analyzed in report after report, and outlined in press release after press release, the easiest and fastest way to provide populations with internet access is to use modern efficient and effective tools that service the most students per dollar. Extending existing fixed broadband connectivity via hotspots and mobile Wi-Fi hotspots, in addition to implementing clouds-based storage of student resources should be at the top of the list. The Commission should assess additionally eligible services for the E-Rate program by looking to see how they can assist students and library patrons and the present and how those services will create an overall better learning experience for students moving into the future.

IV. E-RATE FUNDING FOR REMOTE LEARNING TOOLS SHOULD LAST "AS LONG AS THE SCIENCE DICTATES IT SHOULD".

To quote the White House, the government must "[l]isten to science".[31] For so

[30] See Paragraph 80, E-Rate Modernization Order, https://www.fcc.gov/document/fcc-releases-e-rate-modernization-order (July 23, 2014).
[31] *See* The Biden-Harris plan to beat Covid -19 (accessed on February 6, 2021; last modified on January 21, 2021), https://www.whitehouse.gov/priorities/covid-19/

long as those federal colleagues working in health-focused agencies and departments deem it necessary to stay home, waivers and updates to the E-Rate funding system should be put into place. The FCC should ensure that all available equipment, services, and technology be used to provide students with access to reliable internet and important tools to obtain educational materials for the foreseeable future. Students need to be able to keep up with their schoolwork as well as fulfill their academic curiosities while remotely learning. IA member companies believe our students deserve to have the best tools to help them learn , and to have access to these resources during the pandemic and into the future.

V. CONCLUSION

Students deserve the best our nation has to offer. Funding for cloud-based services; tools for extended broadband access; secure networks; and mobile and Wi-Fi enabled hotspots across the country are the quickest and most effective way to meet students educational needs during the COVID-19 pandemic and beyond. If the FCC were to adopt the recommendations made by the multitude of petitioners and our comments regarding cloud services above, it would bring E-Rate funding into the modern era and allow for innovative solutions to be provided for educational access.

E-Rate funds should be used to expand internet access to students during socially distanced learning; and, in those instances where cloud-based services will reach more students, E-Rate funds should be used to support the cloud-based delivery

of educational opportunities to those using computers and mobile devices.

The ability for E-Rate funds to so dramatically prove their worth in the current pandemic is a rare but important event. IA encourages the FCC to respond by permitting the use of E-Rate funds for modern technology-based delivery methods that can close the digital divide and the homework gap.

Respectfully submitted,

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