

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

In the Matter of)
)
Inquiry Concerning Deployment of Advanced) GN Docket No. 17-199
Telecommunications Capability to All Americans)
In a Reasonable and Timely Fashion)

Comments of the Consortium for School Networking

Introduction

The Consortium for School Networking (CoSN) respectfully submits this response to the Federal Communications Commission’s (“Commission”) *Thirteenth Section 706 Report Notice of Inquiry*.¹ CoSN is the premier professional association for school system technology leaders. For 25 years, CoSN has provided leaders with the management, community building, and advocacy tools they need to succeed. Today, CoSN represents over 13 million students in school districts nationwide and continues to grow as a powerful and influential voice in K-12 education. Our work with the nation’s school district technology leaders includes a focus on ensuring all students benefit from high capacity broadband services at school and at home.

As you consider whether “advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion,” we encourage you to judge the nation’s progress relative to the robust broadband speeds required to support teaching and learning, including not only schools’ instructional needs, but also online assessment, data use and digital resource delivery requirements. This analysis should include the broadband required for school operations and home access, which enables communication and rich engagement with students, families, and supports day-to-day administration. Assessing deployment against anything less than the ambitious goals established by the 2014 E-rate Modernization Order will harm current and future students and delay the country’s steady march toward the ubiquitous, powerful broadband networks required to promote educational, economic and community success.

¹ Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion (GN Docket No. 17-199).

The Commission Should Maintain the 2014 E-Rate Modernization Order’s Vitaly Important Broadband Goals

CoSN’s members strongly support the 2014 E-rate Modernization Order’s (“E-rate Order”) broadband goals, which feature a near term benchmark of 100 Mbps per 1000 students and a long-term target of 1 Gbps per 1000 students. The State Educational Technology Directors Association used an inclusive and comprehensive process for developing these ambitious, yet achievable, goals² and significant progress has been made toward achieving them. For example, CoSN’s *E-Rate and Broadband Survey 2013 Final Report* showed that 43% of the school districts reported that “none of their schools can meet the goal of 100Mbps of internet access per 1,000 students today.”³ Respondents attributed their broadband shortfalls to limitations associated with internal connections/wiring, school’s LAN backbone, and wireless networks. Thanks to the impetus and resources provided by the E-rate Order, however, school districts have been able to address these and other issues and their connectivity levels have leapt forward.

CoSN’s 2016 infrastructure survey shows that schools are making substantial progress towards meeting the Commission’s Short-Term Goal of 100 Mbps per 1,000 students with more than two-thirds (68%) of districts reporting that all the schools in their system fully meet the minimum internet bandwidth recommendations. This number climbs to 80% of districts having three-fourths of their schools at this immediate connectivity goal. This represents a significant improvement in just four years and can be seen equally across urban, rural and suburban districts. Similarly, Education Super Highway’s 2017 State of the States Report shows that “94% of public school districts...are now meeting the FCC’s minimum Internet access goal of 100 kbps per student.”⁴

Approximately three years after the Order’s adoption, the short and long-term goals remain relevant and important to school district technology leaders. Our members not only embraced the E-rate Order’s tiered connectivity goals, but also worked closely with their school administrators, school boards, providers and other stakeholders to develop plans for meeting them. Due to unique local conditions, including resource availability, procurement systems, and other infrastructure needs, broadband planning and implementation of this nature requires time to

² SETDA, *The Broadband Imperative: Recommendations to Address K-12 Education Infrastructure Needs* (2012).

³ CoSN, *E-Rate and Broadband Survey 2013 Final Report*, p. 2.

⁴ Education Superhighway, *2017 State of the States, Fulfilling our Promise to America’s Students*. p.5

complete. Efforts to achieve the E-rate Order's longer-term goals are already in motion and school districts are counting on the Commission to follow through on the E-rate Order's five-year vision and longer-term commitment. Any effort to decrease the broadband targets now could slow their progress and undermine the powerful consensus built locally to push the broadband improvement process forward. Therefore, CoSN urges the Commission to ensure the stability and certainty local leaders will need to follow through on achieving the high connectivity bars established by the E-rate Order.

The Commission Should Adopt Ambitious Connectivity Goals for Fixed and Mobile Broadband Service.

Home Internet access is vitally important to student learning, yet many families do not have the home broadband capacity they need. Students not only lack the out of school access required to complete homework assignments, but also the connectivity they need to take advantage of educational choice opportunities, including access to blended learning, virtual learning, and course choice systems. These innovative models, and the rich digital materials delivered in many learning contexts, often demand significantly more bandwidth than is often available on mobile devices. Though vitally important, mobile broadband, especially at the speeds proposed by the commission (10Mbps downstream and 1Mbps upstream) is not sufficient to replace a fixed connection via cable, fiber, or some other technology. Therefore, we urge the Commission to recognize that students need both home *and* mobile access and thus the Commission's 706 analysis should continue to focus on both connection types.

Our members are working creatively to address their students' home connectivity needs, but frequently are not able to provide out-of-school access at scale to their students. The problem is pronounced for poor and rural families, but also impacts many other students. As a result, addressing home connectivity is a priority for many school districts. They are targeting the problem by offering 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. These discrete district connectivity initiatives are impactful, but the Commission must continue to set high expectations for broadband connectivity speeds for both fixed and mobile connections, which offer consumers different capabilities and options. Absent the Commission's leadership and support, home

broadband access and speeds will continue to be uneven, leaving low-wealth and rural families on the wrong side of the digital divide.

Conclusion

CoSN strongly encourages the Commission to maintain the near- and longer-term broadband goals established by the 2014 E-rate Order and we urge you to continue pushing stakeholders to achieve a high bar for both fixed and mobile broadband in the community to ensure all students have access to the connections they need to prepare for graduation and later success. Thank you for considering our recommendations. We would be pleased to respond to any questions you may have about our comments and students' connectivity needs.



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