

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Ensuring Children's Safe Use of Screens and E-rate-Funded Services	WC Docket No. 26-133
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Modernizing the E-rate Program for Schools and Libraries	WC Docket No. 13-184
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Establishing the Emergency Connectivity Fund to Close the Homework Gap	WC Docket No. 21-93
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Promoting Fair and Open Competitive Bidding in the E-rate Program	WC Docket No. 21-455
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**COMMENTS OF THE CONSORTIUM FOR SCHOOL
NETWORKING**

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SUMMARY

E-rate remains essential to schools' ability to provide reliable broadband access to students and educators. The program's long track record of success in expanding connectivity for learning is not evidence that its work is complete. Broadband is a recurring expense, network equipment must be maintained and replaced, and schools' broadband capacity, security, and reliability needs continue to grow. CoSN, therefore, urges the Commission to reject proposals to terminate or materially reduce E-rate and to preserve the program's proven and well understood framework.

The Commission should also continue modernizing E-rate to meet the connectivity needs of students, teachers, and schools. That includes making appropriate cybersecurity products and services permanently eligible for support within reasonable limits and supporting reasonable redundant or backup connectivity where it is needed for resilience. The FCC Cybersecurity Pilot is an important step towards understanding how to better protect school networks and the confidential data they carry, but network security is an ongoing need that must be directly addressed by the E-rate program.

CoSN supports the Commission's interest in protecting children online. However, E-rate is a broadband infrastructure program, not an instructional policy program. Decisions about screen time and classroom uses of technology should remain with educators, administrators, locally elected school boards, and families. The Commission should not condition E-rate support on a federal parental opt-out from screen-based instruction or related nationwide policies. The Children's Internet Protection Act (CIPA) already provides an important federal framework for preventing access to harmful online material, but how and how much schools use technology for learning should be left to schools and their communities.

I. INTRODUCTION

The Consortium for School Networking (“CoSN”) respectfully submits these comments in response to the Commission’s Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking concerning E-rate and children’s use of E-rate-funded services.¹

CoSN is the national professional association for school system technology leaders. Its members are responsible for broadband networks, internal connections, cybersecurity, student data privacy, instructional technology systems, and other technology that supports teaching, learning, and school operations. That experience gives CoSN a direct and practical interest in the questions raised in this proceeding.²

CoSN supports the Commission’s interest in ensuring that children are safe online and that E-rate funds are used effectively. At the same time, the proceeding raises two sets of questions that should not be conflated. One concerns the future of the broadband infrastructure program Congress created and the Commission administers to connect schools and libraries to broadband. The other concerns how schools use technology for instruction, school safety, and other administrative functions. The first falls squarely within the Commission’s administration of E-rate. The second is primarily a matter for state and local education leaders, educators, and families.

Now more than ever, students, educators, and the schools that serve them require access to secure, high-capacity broadband for learning. Digital curriculum, online assessments, accessibility tools, student information systems, cloud-based applications, communications

¹ Ensuring Children’s Safe Use of Screens and E-rate-Funded Services; Modernizing the E-rate Program for Schools and Libraries; Establishing the Emergency Connectivity Fund to Close the Homework Gap; Promoting Fair and Open Competitive Bidding in the E-rate Program, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, WC Docket Nos. 26-133, 13-184, 21-93 & 21-455, FCC 26-41 (rel. June 26, 2026) [hereinafter NPRM].

² *U.S. State of EdTech 2026*, Consortium for School Networking (2026), <https://www.cosn.org/tools-and-resources/resource/u-s-state-of-edtech-2026/>.

platforms, and emerging technologies such as artificial intelligence all depend on reliable connectivity. At the same time, schools face growing cybersecurity threats and increasing expectations that networks remain available without interruption. These realities mean that school connectivity is not a problem that has been solved; it is an ongoing infrastructure need that requires continued investment, modernization, and protection. E-rate remains essential to helping schools meet those demands.

II. E-RATE REMAINS ESSENTIAL TO SCHOOL CONNECTIVITY

The Commission asks whether E-rate should be limited or sunset because most schools are now connected to the internet. CoSN believes the answer is no. Higher connectivity rates show that E-rate has worked; they do not show that schools no longer need the program.³ Absent E-rate's assistance, many schools, especially high poverty and the most isolated rural schools, would lose access to broadband or be forced to make harmful cuts to vitally important education programs upon which students and their families rely.

School- and campus-wide connectivity is not a one-time capital purchase. E-rate funds can be used for initial capital purchases as well as for needed maintenance and operations projects, such as Internet service, cabling, and professional services. Districts pay for broadband service on an ongoing basis. They also routinely replace switches, routers, access points, and other equipment as it ages. Districts increase capacity as applications and instructional needs and uses continually change. Networks must be maintained so that they are sufficiently reliable and can support online assessments, including annual summative tests required by the Federal Elementary and Secondary Education Act (ESEA), learning management systems, and student information systems. Broadband has also become central to schools' administrative functions,

³NPRM ¶¶ 17–18.

including operating HVAC systems, coordinating transportation, facilitating safe school environments and ongoing communication, and connecting to an increasing number of cloud-based services.

The 2024 National Educational Technology Plan released by the U.S. Department of Education⁴ demonstrates broadband's importance and value to school. Yet, the 2024 Plan also exhibits how easily the progress made over the last 30 years towards delivering more universal access could be lost. The 2024 Plan reported substantial progress in school broadband access, but identified connectivity, devices, content, accessibility, and digital skills as important components of the digital access divide.⁵ The plan also cautioned that infrastructure gains can erode without sustainable funding as devices and networks reach the end of their useful lives.⁶

The experience of E-rate recipients is especially relevant to the Commission's inquiry about the program's future. In the 2026 E-rate Trends Report published by Funds for Learning, 95.9% of respondents said that E-rate is vital to their mission. Additionally, 90.8% said that they can depend on the program each year.⁷ More than 90% credited E-rate with faster connections, and 90.2% reported that the program enables more people to access the internet.⁸

Those results are consistent with what CoSN hears from school district leaders. E-rate has enabled districts to build and maintain networks that many could not afford on their own. Removing or materially reducing that support would not lock in the gains the program has produced—it would shift recurring connectivity costs back to state and local education budgets,

⁴ *A Call to Action for Closing the Digital Access, Design, and Use Divides: 2024 National Educational Technology Plan*, U.S. Department of Education Office of Educational Technology (Jan. 2024), <https://eric.ed.gov/?id=ED641164>.

⁵ See generally, *id.*

⁶ *Id.* at 75-76.

⁷ *2026 E-rate Trends Report 5*, Funds for Learning (2026), <https://www.fundsforlearning.com/trendsreport/>.

⁸ *Id.* at 87.

where such costs would compete with staffing, instructional materials, student services, and other priorities. The impact of losing the program would be greatest in rural, high-poverty, and other resource-constrained communities.

The Commission should therefore reject proposals to terminate or materially reduce the E-rate program, including rejecting proposals to narrow its focus to only rural areas. Poverty is not just a rural issue. Rural, suburban, and urban schools rely on the program. The better approach is to preserve the existing program and ensure that it continues to support the level of connectivity that all schools need now and in the future. That approach is consistent with the universal service principles adopted by Congress in the Telecommunications Act of 1996, including that schools should have access to an “evolving level” of telecommunications and information services.⁹

III. CYBERSECURITY SHOULD BECOME A PERMANENT ELIGIBLE SERVICE.

In response to the Commission’s request for comment on schools’ evolving connectivity needs, we urge the agency to focus more attention on cybersecurity. Cybersecurity is an essential part of operating a reliable and safe school network. A school district may have sufficient bandwidth and modern internal connections, but those investments mean little if a cyberattack disables the network, compromises student and personnel information, or forces learning systems offline. While E-rate ensures broadband access, it should also ensure that those connections are safe and secure.

Cybersecurity readiness requires an investment in security tools. It also depends on districts having the organizational capacity to identify risks, protect systems and data, detect

⁹ 47 U.S.C. § 254(c)(1), (h)(2)(A).

threats, respond to incidents, and recover operations. Therefore, permanent E-rate cybersecurity support should also encourage and enable applicants to improve their cybersecurity capabilities.

CoSN has consistently urged the Commission to modernize E-rate so schools can use program support for contemporary network security. In comments filed in partnership with other national education and library organizations in the Commission’s Cybersecurity Pilot proceeding, CoSN emphasized that secure, high-capacity broadband is essential to student access and that schools should not be expected to bear the cybersecurity burden alone.¹⁰

The need has only become clearer. CoSN’s 2026 State of EdTech survey again identified cybersecurity as the top priority for school technology leaders—65% of respondents identified inadequate cybersecurity staffing and the lack of a dedicated cybersecurity budget as leading barriers to improving security.¹¹ These challenges shows the need for sustained funding and for districts to increase their cybersecurity capacity. Districts, particularly smaller and budget constrained districts, need the personnel, expertise, processes, and ongoing capability to effectively implement and sustain cybersecurity investments.

The FCC Cybersecurity Pilot is an important step in the right direction. The Pilot will provide the Commission with additional information about school and library cybersecurity needs and costs. But the Pilot should not become an endpoint. The Commission should use the information it produces to make appropriate cybersecurity products and services permanently eligible using an approach that defines and limits the overall funding available for this important purpose while maintaining the program’s core focus on connectivity. For example, cybersecurity services can become part of Category Two, in which case additional Category Two funding

¹⁰ *Comments of the Consortium for School Networking et al.*, at 4–6, Schools and Libraries Cybersecurity Pilot Program, WC Docket No. 23-234 (filed Jan. 29, 2024).

¹¹ *U.S. State of EdTech 2026*, *supra* note 2.

should be allocated to support cyber investments, or a new Category Three could be created to focus on cybersecurity.

Furthermore, schools should have sufficient flexibility to direct future E-rate cybersecurity funding toward locally assessed cybersecurity risks, readiness gaps, and priorities. A risk-based approach will help ensure that federal support drives strategic cybersecurity improvement while preserving local decision-making rather than encouraging a one-size-fits-all approach. Eligible services should include the types of cybersecurity products and services the Commission is testing through the Pilot, subject to reasonable definitions and program safeguards, while providing schools flexibility to select investments based on assessed risk and operational need. The 2026 E-rate Trends Report shows strong applicant demand for this change, including requests to make cybersecurity components, security hardware and software, advanced firewall features, and related services permanently eligible.¹²

This is a straightforward modernization of E-rate. The program should help schools connect their networks and keep those networks available and secure. Cybersecurity measures are essential to protecting student and personnel data and protect students more broadly from online dangers.

Permanent cybersecurity funding should encourage participating schools and libraries to establish a baseline of cybersecurity readiness. This baseline should be developed using a recognized cybersecurity framework or maturity-based assessment, such as CoSN's Cybersecurity Readiness for Education (CCRE) or an approach aligned with the National Institute of Standards and Technology (NIST) or the Cybersecurity and Infrastructure Security

¹² 2026 E-rate Trends Report 5, *supra* note 7, at 40–41, 66–67.

Agency (CISA) guidance. Participants should then reassess their readiness at regular intervals after funded investments are implemented.

IV. E-RATE SHOULD SUPPORT NETWORK RESILIENCE AND REDUNDANT CONNECTIVITY.

Regarding schools' evolving connectivity needs, CoSN encourages the Commission to recognize network resilience and redundant connectivity as an important part of modern school infrastructure. As school operations have moved to cloud-based systems, network reliability has become even more important. An internet outage can interrupt instruction, assessments, family communications, student information systems, and basic administrative functions. For some districts, a single broadband connection creates a single point of failure.

CoSN therefore urges the Commission to make reasonable redundant or backup connectivity eligible for E-rate support when an applicant can demonstrate that the additional connection is used to maintain continuity of service. This is not unnecessary duplication. In many school systems, it is standard resilience planning.

E-rate applicants have made the same point. The 2026 E-rate Trends Report specifically identifies resilience and redundancy as emerging applicant needs. One Oregon school district said in the report, "[A]s the reliance on stable and fast Internet access continues to grow, it would help us tremendously to receive E-rate funding for a redundant ISP connection."¹³ An Alaska school district said in the report, "[R]eliable primary and redundant Internet connections are critical for instruction, safety, communication, and continuity of operations."¹⁴

The Commission can address reasonable cost and program-integrity concerns through the same competitive bidding, discount, and documentation requirements that apply to other E-rate

¹³ 2026 E-rate Trends Report, *supra* note 7, at 35.

¹⁴ *Id.* at 44.

services. A categorical exclusion of backup connectivity is increasingly difficult to square with the way school networks are operated.

V. SCREEN TIME AND INSTRUCTIONAL TECHNOLOGY DECISIONS SHOULD REMAIN LOCAL.

CoSN recognizes the concerns that many parents and educators have about excessive or inappropriate technology use. School systems are addressing those concerns in a variety of ways, including by updating and adopting restrictions on personal devices and social media, content filtering, responsible-use policies, digital citizenship instruction, and changes in instructional practice.

Parent concerns do not support adopting policies that treat all screen use the same. A student scrolling social media, a student taking a required assessment, a student using text-to-speech as an accessibility support, and a student completing an adaptive intervention all require a screen. The educational purpose, level of supervision, and consequences of those activities are very different. A single national policy for the nation's more than 13,000 school districts that attempts to address these and other screen uses would inherently do more harm than good.¹⁵

Furthermore, recent parent polling reinforces the importance of distinguishing concerns about excessive screen use from parental opposition to educational technology. In EdChoice and Morning Consult polling, 86% of school parents supported the use of laptops in their child's classes.¹⁶ Separately, a National Parents Union survey found that 74% of parents believed their

¹⁵ Nat'l Ctr. for Educ. Stat., U.S. Dep't of Educ., *NCES Data Show Public School Enrollment Held Steady Overall From Fall 2022 to Fall 2023* (Common Core of Data, 2023–24), <https://nces.ed.gov/learn/press-release/nces-data-show-public-school-enrollment-held-steady-overall-fall-2022-fall-2023> (last visited Oct. 13, 20

¹⁶ *The Public, Parents, and K–12 Education: June 2026 Polling* 48, EdChoice & Morning Consult (June 2026), <https://www.edchoice.org/research/the-public-parents-and-k-12-education-june-2026-polling/> (reporting 86% total support among school parents for laptops in their child's classes).

child’s school was using computers and tablets about the right amount. Among parents who favored a daily screen time limit, only 1% wanted no screen time at all.¹⁷

Local leaders are best equipped to make these decisions, which includes a clear delineation between instructional screen time and screen time for entertainment. That is why CoSN’s recent guidance, developed by school district leaders, recommends a “purpose before minutes” approach. The goal should be to ensure that technology has a clear instructional purpose, is used safely, and supports learning, rather than to establish a single screen time measure for every student, classroom, or district.¹⁸

The Commission’s questions about screen time also raise a basic governance concern. Local school boards, administrators, and educators are responsible for curriculum and instruction and are accountable to the families and communities they serve. They are better positioned by virtue of their expertise and proximity to students than the FCC to determine when technology is educationally appropriate, when a non-digital approach is preferable, and how local policies should respond to community concerns.

VI. THE COMMISSION SHOULD NOT CONDITION E-RATE ON THE AVAILABILITY OF A FEDERAL PARENTAL OPT-OUT.

For similar reasons, CoSN opposes a federal requirement that E-rate recipients provide a general parental opt-out from screen-based instruction. Parents should be informed about district

¹⁷ *National Parents Union Survey 7-8*, National Parents Union: Echelon Insights (May 2026), <https://nationalparentsunion.org/wp-content/uploads/2026/06/National-Parents-Union-May-2026-Survey-Topline.pdf> (see questions 19, 21-22, reporting that 74% of parents said their child’s school used computers or tablets about the right amount and, among parents favoring a daily screen time limit, 1% favored no screen time at all).

¹⁸ *From Screen Time Mandates to Purposeful Technology Policies and Guidance 2-4*, Consortium for School Networking (2026), <https://www.cosn.org/from-screen-time-mandates-to-purposeful-technology-policies-and-guidance/>.

technology policies and have meaningful opportunities to raise concerns. But a federal opt-out tied to E-rate would create significant instructional and administrative challenges.¹⁹

Technology is integrated into many activities that are difficult to separate from the rest of a school program. Districts use digital tools for state and local assessments, accessibility and assistive technology, individualized interventions, multilingual learner supports, curricular materials, collaboration, and communication. Some of these uses are connected to legal obligations under the Individuals with Disabilities Education Act (IDEA), Section 504, the Americans with Disabilities Act (ADA), or statewide assessments required by the Elementary and Secondary Education Act (ESEA). These are not unusual exceptions; they are a part of ordinary school operations.

Opt-out models would add massive cost and workload, complicate classroom management, and, in some settings, reduce a student's access to the same instructional resources available to classmates. CoSN's screen time guidance specifically cautions against policies that interfere with accessibility, assessment, intervention, and other protected or necessary uses of technology.²⁰

CIPA provides a better model for an appropriate federal role. Congress established a sound E-rate structure for keeping harmful adult material from students, while preserving local responsibility for important judgments about implementation. The Commission should maintain that balance.²¹

Families should have a strong voice in their local district technology policy. That voice is best exercised through local policy development, communication with educators and

¹⁹ NPRM ¶¶ 30–31.

²⁰ *From Screen Time Mandates to Purposeful Technology Policies and Guidance*, *supra* note 18, at 4–5.

²¹ 47 U.S.C. § 254(h)(5)–(6), (l); 47 C.F.R. § 54.520.

administrators, and locally accountable school boards—not through a national E-rate condition that attempts to govern individual instructional decisions.

VII. CONSULTANTS PROVIDE IMPORTANT CAPACITY FOR MANY E-RATE APPLICANTS

CoSN supports appropriate consultant oversight. We encourage the Commission to recognize the useful role consultants play for many applicants, especially smaller districts that have limited time and resources to complete the complex E-rate application process.

E-rate involves detailed competitive bidding, application, documentation, invoicing, and compliance requirements. Large school systems may have staff who specialize in the program, but smaller districts often do not. For those applicants, experienced consultants can provide expertise and administrative capacity that would be difficult to maintain internally.

Changes affecting consultants should not make it harder for districts to obtain legitimate professional assistance or add compliance burdens that discourage participation. Any new requirements should place obligations on consultants, not applicants. Specifically:

- No school or library form should be held or rejected because a consultant's annual certification is late. Any consequence should fall on the consultant. Each consultant should file Form 5654 once a year directly with USAC, so applicants do not have to collect forms from every consultant they use. Applicants that do not use a consultant should be able to indicate this with a checkbox on the Form 471 rather than a separate annual form. Consultants should certify only to their own conduct; certifications about eligibility and procurement should remain with the applicant.
- Applicants should retain letters of agency and fee agreements and produce them on request rather than filing them annually. The Commission should also replace "banking records" with "records sufficient to show payments," given that a district's bank statements cover all transactions, not just payments to consultants.

- Finally, the definition of "consultant" should exclude public employees, such as state E-rate coordinators and educational service agency staff, who assist other entities without compensation from those entities or from a vendor, as well as unpaid volunteers and clerical staff who do not use USAC's systems.

VIII. CONCLUSION

E-rate has succeeded because it has provided stable, targeted support for the connectivity that schools and libraries need. The Commission should preserve that successful foundation.

CoSN urges the Commission: (1) to reject proposals to terminate or materially reduce E-rate; (2) preserve the successful Category One and Category Two framework; (3) allow eligible services to evolve with school network needs; (4) support reasonable redundant and backup connectivity; (5) make appropriate cybersecurity products and services permanently eligible; and (6) avoid using E-rate to regulate screen time or other instructional decisions that are better made locally.

The Commission can support local leadership on online safety and wellness without weakening E-rate or turning it into an instructional policy program. Preserving that distinction will allow E-rate to continue doing what it has done effectively for decades: provide schools with the affordable, reliable, and secure network infrastructure that every function of a modern school now depends on.

Respectfully submitted,

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