

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform)	WC Docket No. 11-42
)	
Modernization, Telecommunications)	
Carriers Eligible for Universal Service)	
Support)	WC Docket No. 09-197
)	
Connect America Fund)	WC Docket No. 10-90

**COMMENTS FROM THE ALLIANCE FOR EXCELLENT EDUCATION IN THE
MATTER OF LIFELINE AND LINK UP REFORM, MODERNIZATION,
TELECOMMUNICATIONS CARRIERS ELIGIBLE FOR UNIVERSAL SERVICE
SUPPORT, and CONNECT AMERICA FUND**

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I. INTRODUCTION AND SUMMARY

The Alliance for Excellent Education (the Alliance) is pleased to submit comments to the Federal Communications Commission (the Commission) in reply to the request for comments issued by the Commission regarding rebuilding the Lifeline program’s current framework and continuing efforts to modernize the Lifeline program.¹ The Alliance is pleased to strongly support the Commission’s efforts to expand broadband to low-income residents through modernization of the Lifeline program and these comments will focus on that effort and how the program can improve learning across the nation.

Modernization of the E-rate program was the first step in connecting more students to the internet while they learn in schools and libraries. The Alliance applauds the Commission for that effort. Thanks to the Commission, an additional \$1.5 billion annually is now available to improve internet access in the nation’s schools and libraries. The decision is expected to expand high-speed Wi-Fi access to 43.5 million additional students, more than 101,000 additional schools, and nearly 16,000 additional libraries. Through modernization of the Lifeline program, the Commission can further close the gap in learning by providing more opportunities for children from low-income families to have access to broadband while at home.

¹ Lifeline and Link Up Reform, Modernization, Telecommunications Carriers Eligible for Universal Service Support, and Connect America Fund (WC Docket Nos. 11-42, 09-197, 10-90), Notice of Proposed Rulemaking, FCC 13-100 (rel. July 17, 2015), <https://www.federalregister.gov/articles/2015/07/17/2015-17289/lifeline-and-link-up-reform-and-modernization-telecommunications-carriers-eligible-for-universal> (accessed August 13, 2015).

II. ABOUT THE ALLIANCE FOR EXCELLENT EDUCATION

The Alliance for Excellent Education is a Washington, DC–based national policy and advocacy organization dedicated to ensuring that all students, particularly those traditionally underserved, graduate from high school ready for success in college, work, and citizenship.

The Alliance works to encourage the development and implementation of federal and national policies that support effective high school reform and increased student achievement and attainment. It works to synthesize and distribute research and information about promising practices that enlighten the national debate about education policies and options. The Alliance provides sound, objective, nonpartisan advice that informs decisions about policy creation and implementation. Working with educators, researchers, business leaders, citizen groups, and decisionmakers at the local, state, and national levels, the Alliance develops federal policy recommendations and advocates to policymakers in the federal government.

In recent years, the Alliance has been particularly focused on efforts to provide more personalized and deeper learning experiences for students supported in part by access to adaptive technology and high-quality digital content. The Alliance originated and leads Digital Learning Day, a yearly event celebrating teachers and high-quality digital learning that leads to improved outcomes; coordinates the Future Ready Schools initiative to help school districts plan how to use technology effectively to transform education, in conjunction with the U.S. Department of Education and with the support of the Leading Education by Advancing Digital (LEAD) Commission; and coordinated more than 100 organizations around calling for modernization of the E-Rate program to help schools and libraries gain better access to high-speed broadband.

III. ACCESS TO THE INTERNET CAN HELP LEAD TO MORE PERSONALIZED AND IMPROVED STUDENT LEARNING

A. TECHNOLOGY AND HIGH-QUALITY ONLINE CONTENT CAN ASSIST VULNERABLE AT-RISK STUDENTS

In September 2014, the Alliance partnered with the Stanford Center for Opportunity and Public Policy (SCOPE) to produce a report that finds that when technology is implemented properly, it can provide at-risk students with more engagement and increased achievement in their learning.² The report notes that there is substantial research backing that “activities supporting many kinds of interactions between learners and the material—including different visualizations of concepts; multiple ways of seeing, hearing, and learning about them; and opportunities to be active in manipulating data, expressing ideas, and other aspects of the learning process—were essential to support learning by lower-achieving and other at-risk students.”³

² L. Darling-Hammond, M. B. Zielesinski, and S. Goodman, *Using Technology to Support At-Risk Students Learning* (Washington, DC: Alliance for Excellent Education; Stanford Center for Opportunity and Public Policy, 2014) p. 4, <http://all4ed.org/reports-factsheets/usingtechnology/> (accessed August 13, 2015).

³ *Ibid.*, p. 15.

The report cites that lack of access to technology for students from low-income families and traditional minorities is a major impediment to improved student learning in vulnerable populations. For example, 56 percent of teachers working in high-poverty schools compared with 21 percent of teachers in other schools were more likely to say that the “lack of resources or access to digital technologies among students” was a problem in their classes. Starkly, only 3 percent of teachers in high-poverty schools believed their students had digital tools that were adequate to do homework while 52 percent of teachers at other schools believed their students possessed those tools and technology to work at home.⁴

While there are some technologies that are software based, access to online content must be available for at-risk students and students from low-income families when they are home so they can access this rich and deeper adaptive content. Personalized high-quality digital learning content offers at-risk students opportunities to have anywhere, anytime learning opportunities whether at school, the library, or at home. However, if students do not have adequate access to the internet, they cannot take advantage of those opportunities.

B. HOME INTERNET ACCESS IS A KEY TOOL TO SUPPORT PERSONALIZED LEARNING

Personalized learning is an instructional model tailored to a student’s unique educational skills, needs, and interests that offers a more engaging learning experience and a deeper involvement for a student to better own their learning. Great teachers are vital for its success as are flexible instruction models that provide more opportunities for students to move at their own pace. Important tools that support those teachers and models, such as the use of adaptive technology and high-quality digital and online content, make access to broadband critical. Students from low socioeconomic backgrounds who lack internet access at home face a significant disadvantage when compared to students from wealthier families and an impaired ability to truly benefit from personalized learning. This lack of connectivity not only creates an educational disparity, but it has long-term economic consequences for the nation.

Providing a personalized learning approach to instruction gives teachers more flexibility in how they teach and allows them to work more closely with students and spend more time with each student to create specific options and learning paths tailored to individual success. This flexible approach leads the instruction to continually adapt to the student instead of forcing the student to adapt his or her learning needs to the instruction. Allowing students to both move at their own pace and adjust their learning goals are two important elements to personalizing learning. Students who need to spend more time on a subject can do so while students who have mastered the same subject can move on to new and more challenging material. Such an approach requires students to have access to high-quality digital content and instructional tools, both in school and at home. In today’s global economy, the nation’s students’ learning cannot start and stop with the school bells.

⁴ Ibid., p. 3, citing K. Purcell et al., *How Teachers Are Using Technology at Home and in Their Classrooms* (Washington, DC: Pew Research Center’s Internet and American Life Project, 2013), <http://www.mydesert.com/assets/pdf/J12142481024.PDF> (accessed February 12, 2014).

For personalized learning to take place at scale, technology is crucial.⁵ Thanks to the Commission’s efforts to expand and modernize the E-Rate program, an important step was made to move the nation’s schools toward more personalized learning. However, giving students more ownership and engagement of their own learning cannot just take place during the school day or at the library; it also must take place at home by giving all students, including those from low-income families, access to personalized high-quality digital learning twenty-four hours a day, seven days a week.

C. PERSONALIZED LEARNING AND TECHNOLOGY CAN HELP STUDENTS DEVELOP DEEPER LEARNING SKILLS

Today’s global economy requires that students develop advanced skills. As students graduate from high school and pursue a career or enroll in college, they need to be able to compete with other qualified applicants in the job market and those in their postsecondary school environment. Today, pursuing employment opportunities requires that a student have a richer set of skills and abilities such as “a mix of knowledge, skills, and dispositions that includes critical thinking and problem solving, effective communication, collaboration, an academic mindset, and the ability to learn how to learn—all applied to the mastery of rigorous academic content.”⁶ This type of learning is called “deeper learning.”

Technology can play a pivotal role in schools where deeper learning is practiced. For example, New Tech Network schools incorporate technology throughout their instruction. Students learn through “hands-on projects that require them to collaborate in solving complex problems. These projects rely on creativity, ingenuity, and subject material relevant to the students’ communities, preparing them to engage in a world increasingly driven by technology.”⁷ Providing students from low-income families with access to the same level of technology and to the internet—at school and at home—allows for more opportunities and time to develop deeper learning skills.

IV. IMPROVING EQUITY AND CLOSING THE HOMEWORK GAP

While a digital gap exists between lower-income families and higher ones, the gap also significantly impacts families with school-aged children. Without access to the internet at home, many students from low-income families across the nation are forced to stay late at school, go to the library, or find a fast food restaurant or other venue with free Wi-Fi access so they can do their homework. In many urban areas, students may be in jeopardy when they are forced to walk home through high crime neighborhoods, while in very rural and remote areas, students live too far away from these free Wi-Fi locations to take advantage of them. Districts such as Kent School District in Washington state are working to provide access to these areas through mobile kiosks so that students have broadband access and parents can access school resources, apply for

⁵ M. A. Wolf, *Innovate to Educate: System [Re]Design for Personalized Learning: A Report from the 2010 Symposium* (Washington, DC: Software and Information Industry Association in collaboration with ASCD and Council of Chief State School Officers, 2010), <http://www.ccsso.org/Documents/2010%20Symposium%20on%20Personalized%20Learning.pdf> (accessed August 13, 2015).

⁶ Alliance for Excellent Education, *The Deeper Learning Network* (Washington, DC: Author, 2014) <http://all4ed.org/reports-factsheets/deeper-learning-network-overview/> (accessed August 13, 2015).

⁷ Ibid.

jobs, and meet basic needs. This “homework gap,” as it is now being called, must be narrowed if education and learning is going to improve, particularly for students from low-income families and at-risk students.

In a recent report, the Pew Research Center notes that 82.5 percent of households with school-aged children have internet access but only 60.3 percent of families with incomes under \$25,000 have internet access. Families of color with incomes below \$25,000 have even lower access with African American families at 53.6 percent and Hispanics at 54.8 percent. Conversely, only 8.4 percent of households with annual incomes above \$50,000 do not have a home broadband internet connection.⁸ In other words, “low-income homes with children are four times more likely to be without broadband than their middle- or upper-income counterparts.”⁹

Households With School-Age Children That Do Not Have Broadband Access

Among households with school-age children ...

% LACKING A HIGH-SPEED CONNECTION AT HOME

	All	White	Black	Hispanic	Asian
Annual income under \$50,000	31.4%	24.6%	38.6%	37.4%	15.5%
\$50,000 or greater	8.4	6.7	13.0	12.8	4.0

% WITH A HIGH-SPEED CONNECTION AT HOME

All households with school-age children	82.5%	88.0%	71.5%	72.2%	92.3%
Annual income under \$25,000	60.3	67.9	53.6	54.8	79.0
\$25,000-\$49,999	75.7	80.6	71.2	69.2	88.6
\$50,000-\$99,999	88.2	90.5	84.1	82.1	94.0
\$100,000-\$149,999	94.3	95.1	91.7	90.6	96.5
\$150,000+	96.7	97.0	93.5	93.9	97.9

Source: Pew Research Center analysis of 2013 American Community Survey (IPUMS).

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These great differences in access to the internet at home are placing many of America’s students at risk of not graduating from high school and not being prepared to succeed in life. When access to technology is given to all students, including those from low-income families and those at-risk, they will benefit from more opportunities to personalize their learning and develop the deeper learning competencies necessary for success in the modern world. Modernizing the Lifeline program to allow it to be used for broadband can jumpstart closing the digital divide for all Americans as well as the homework gap for students from low-income families, yielding a long-term, positive economic impact for the nation.

⁸J. B. Horrigan, *The Numbers Behind the Broadband Homework Gap* (Washington, DC: Pew Research Center, 2015), <http://www.pewresearch.org/fact-tank/2015/04/20/the-numbers-behind-the-broadband-homework-gap/> (accessed August 12, 2015).

⁹ Ibid.

V. CONCLUSION: LIFELINE PROGRAM SHOULD BE MODERNIZED AND INCLUDE BROADBAND COVERAGE FOR ELIGIBLE LOW-INCOME FAMILIES TO HELP NARROW THE HOMEWORK GAP

The *Hechinger Report* recently reported that schools in many disadvantaged communities nationwide are actively searching for innovative ways to bridge the digital divide. For example, the Coachella Valley Unified School District in southern California is experimenting with placing Wi-Fi in school busses and then parking them overnight in trailer parks where children from low-income families live.¹⁰ The Alliance commends these efforts to solve the homework gap problem, but school districts should not have to park a school bus in a trailer park overnight so a student can have internet access at home. The nation must do more to provide low-income families with connections directly to the internet.

The Alliance strongly supports the efforts of the Commission to expand and modernize the Lifeline program to allow it to be used for broadband and stands ready to work with the Commission and other organizations to meet that goal and narrow the homework gap. Expansion of the Lifeline program to allow for broadband use by low-income families is not the only solution to bridge the digital divide, but it will improve the lives of millions of low-income Americans and provide all students an equal opportunity to have access to important digital content that can personalize and improve learning and insure they graduate from high school prepared with the necessary college- and career-ready skills and knowledge to be successful in school, work, and life.

¹⁰ N. Dobo “Poor Students Often Lack an Internet Connection: Is This FCC Program a Solution” *Hechinger Report*, June 18, 2015, http://hechingerreport.org/poor-students-often-lack-a-home-internet-connection-is-this-fcc-program-a-solution/?utm_source=feedburner&utm_medium=feed&utm_campaign=Feed%3A+HechingerReport+%28Hechinger+Report%29 (accessed August 12, 2015).