

December 23, 2021

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Wireline Competition Bureau

All4ED, formerly the Alliance for Excellent Education appreciates the opportunity to reply to comments for the Federal Communications Commission (FCC) as it begins the implementation of the Affordable Connectivity Program (ACP) established under the Infrastructure Investment and Jobs Act (Infrastructure Act) (P.L. 117-58).

All4Ed advances equitable policies and practices so all students, particularly students of color and those from low-income families, graduate high school prepared to complete postsecondary education and achieve success in a rapidly changing world. All4Ed's Future Ready Schools initiative works with school and district leaders to implement student-centered learning strategies to target existing inequities, remedy disparities in in-school and out-of-school technology access and use technology to create equitable learning opportunities for all students.

This filing focuses on the request for comments from the Wireline Competition Bureau in its Public Notice of November 18, 2021 (DA 21-1453, WC Docket No.21-450). The comments and recommendations provided focus on Part II. G. "Promoting Awareness about and Participation in the Affordable Connectivity Program."

Create joint guidance from the FCC and the Department of Education (ED) to help low-income families learn about and apply for the program.

An analysis produced by All4Ed, the National Indian Education Association, the National Urban League, and UnidosUS found that as many as 17 million children did not have high-speed home internet access and over 7 million children did not have access to a laptop, desktop, or tablet in 2018.¹ Data from Common Sense Media suggests that progress has been made to narrow the Homework Gap; however, millions of children still lack the technology necessary to effectively receive an education during the pandemic.² The heroic efforts of the FCC and state educational agencies (SEAs) via the Emergency Connectivity Fund (ECF) have helped to close the homework gap for millions of students across the nation. The Emergency Broadband Benefit (EBB), ACP's predecessor, has served alongside ECF to close the digital divide for children and their families and is a long-term vehicle that can continue to close opportunity gaps for low-income families.

¹ John B. Horrigan, "Students of Color Caught in the Homework Gap" (Washington, DC: Alliance for Excellent Education, National Indian Education Association, National Urban League, and UnidosUS, 2020), www.all4ed.org/homeworkgap.

² Ali Chandra et al, "Looking Back, Looking Forward: What It Will Take to Permanently Close the K-12 Digital Divide" (San Francisco, CA: Common Sense Media, 2021), https://www.common Sense Media.org/sites/default/files/uploads/pdfs/final_what_it_will_take_to_permanently_close_the_k-12_digital_divide_vfeb3.pdf.

Schools have long been trusted community entities that often serve as a centralized information hub for families. As highlighted by the pandemic, schools and districts already have the experience to successfully serve as the distribution site for much needed community resources from meals to technology and other support services. Therefore, we recommend the FCC and the Department of Education (ED) develop joint guidance for schools, school districts, and State Educational Agencies to help low-income families learn about and apply for the program. By working in partnership with ED, the FCC can harness the power of school communities to ensure that families with the greatest need are given access to the high-quality, high-speed internet and current technology to access learning, healthcare, employment, and more.

Create a streamlined way for Local Educational Agencies (LEAs) and Institutions of Higher Education (IHEs) to broker services and equipment for eligible recipients.

Alongside joint guidance to promote family participation, the FCC should create pathways for LEAs and IHEs to develop relationships with service and equipment providers to make participation for families and, especially, for vulnerable postsecondary students, more accessible. Ideally, LEAs and IHEs would be able to apply for services and equipment on behalf of eligible families and students - akin to the E-rate program - rather than requiring them to apply on their own. Strong partnerships between education entities that are trusted by students and families and providers will ensure that they may become connected efficiently and expeditiously.

The Affordable Connectivity Program presents the FCC with a historic opportunity to narrow the Homework Gap while closing the digital divide across the nation. All4Ed appreciates the Wireline Competition Bureau's thoughtful Public Notice that demonstrates the intention of effectively implementing the Affordable Connectivity Program and encourages the FCC to prioritize students who have historically been underserved. All4Ed looks forward to working with the Wireline Competition Bureau and the FCC to close the Homework Gap and ensure all students have the high-speed home internet and connected devices needed to engage in education during the COVID-19 pandemic and beyond.