

DRAFT

May 7, 2020

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW Washington, DC 20054

Dear Chairman Pai:

Unprecedented times have unfolded through the COVID-19 national emergency, with our most vulnerable communities exposed to its harmful impact. As K-12 public education systems have shifted to virtual learning in order to support students through the pandemic, inequities in internet access have become substantially amplified.

In our Dallas County community alone (9th largest in the U.S.), **25% of households with children currently lack high-speed broadband internet**, with much of this shortfall concentrated in **just 10 high-poverty zip codes out of 92 zip codes in our region**. Expanding the analysis to the state of Texas, which educates 10% of the nation, reflects a similar crisis. Per U.S. Census data, **1.3 million (~17%) of the 7.3 million households with children in our state do not have broadband subscription, with 800,000 of these households located in just 10 of Texas's 254 separate counties**. The most significant numbers of households lacking broadband access in Texas can be found in our large metro urban counties, but it is noteworthy that the largest percentage of households without broadband are concentrated in the Rio Grande Valley and select rural counties.

Our state's primary challenges are low subscription rates (due to cost and insufficient household credit to purchase the service) coupled with the lack of broadband infrastructure in our more rural counties. Prior to COVID 19, a Pew research report cited nearly 60% of eighth graders in the United States used the internet to do homework every or nearly every day. Barriers to internet access existed even under "normal" conditions, but in this post-COVID world, the FCC has a unique opportunity to make a vast impact ensuring public education can continue and improve by pursuing equity and excellence during these trying times.

Along with 34 of my fellow superintendents, collectively educating over 1.6 million students representing 3% of the U.S. K-12 population (see attached), we together urge the FCC to consider these recommendations regarding amending current E-Rate rules:

1. **Permanently allow schools and libraries to extend their networks beyond campus boundaries.** There is precedence for this with the FCC's "[Learning-On-The-Go](#)" pilot from 2011.
2. **Permanently allow the use of school networks for families, not just students, at or below the poverty line so that parents can support learning for their students and themselves.** This would be an extension and expansion of order [DA-20-234](#).
3. **Allow use of E-Rate dollars for building school community wireless networks in underserved neighborhoods.** E-Rate funding allows school districts and libraries to build private networks (i.e.: fiber) to a campus, but those networks are limited in how, who and when that capacity can be used. Implementing a point-to-multipoint wireless network can leverage both district property and existing digital infrastructure to create neighborhood hotspots for students and parents to use 24x7. E-Rate rules need to allow for multiple uses of existing infrastructure. Eligible service lists need to be expanded to include radio antennas and receiver devices for each home.
4. **Allow E-Rate funds to be used for cellular data plan subscriptions for students.** This will allow students to participate in distance learning programs during the COVID-19 pandemic and any similar future events. This also provides for student success in homework, research, and applications for higher education and employment.
5. **Allow Category 2 E-Rate funds to be pooled across campuses to improve equity outcomes.** Some schools require more investment than others to bring technology infrastructure to modern standards. Allowing Category 2 budgets to be pooled and shifted within the overall district authorization limit speeds improvement at campuses with the most need without impacting overall E-rate investment.

The FCC is positioned to meet this urgent need through the long-established E-rate program to help alleviate the needs of our most vulnerable communities. The decisions made now will not only mitigate current disruption but will also have a profound effect on the future of all K-12 public and private education systems to ensure equity as a top priority. Thank you for considering these recommendations.

Respectfully,

Dr. Michael Hinojosa
Superintendent, Dallas ISD
Educating ~155,000 students (~30% lacking broadband access)

cc: Texas Governor Greg Abbott
Texas Lt. Governor Dan Patrick
Texas Education Commissioner Michael Morath

FELLOW SIGNATORIES

35 Texas school systems, 1.62 million students served in total

Dr. H.D. Chambers
Superintendent, Alief ISD
~46,000 students, (~xx% lacking access)

Dr. Grenita Lathan
Superintendent, Houston ISD
~215,000 students, (~xx% lacking access)

Dr. LaTonya Goffney
Superintendent, Aldine ISD
~70,000 students, (~xx% lacking access)

Dr. Pedro Martinez
Superintendent, San Antonio ISD
~53,000 students, (~xx% lacking access)

Dr. Kent Scribner
Superintendent, Fort Worth ISD
~87,000 students, (~xx% lacking access)

Dr. Juan Cabrera
Superintendent, El Paso ISD
~60,000 students, (~xx% lacking access)

Dr. Jeannie Stone
Superintendent, Richardson ISD
~39,000 students, (~xx% lacking access)

Dr. Paul Cruz
Superintendent, Austin ISD
~83,000 students, (~xx% lacking access)

Dr. Magda Hernandez
Superintendent, Irving ISD
~35,000 students, (~xx% lacking access)

Dr. Marcelo Cavazos
Superintendent, Arlington ISD
~65,000 students, (~xx% lacking access)

Dr. John Chapman
Superintendent, Carrollton Farmers Branch ISD
~26,000 students, (~xx% lacking access)

Dr. Xavier De La Torre
Superintendent, Ysleta ISD
~42,000 students, (~xx% lacking access)

Dr. Sara Bonser
Superintendent, Plano ISD
~54,000 students, (~xx% lacking access)

Dr. Roland Hernandez
Superintendent, Corpus Christi ISD
~38,000 students, (~xx% lacking access)

Dr. David Vroonland
Superintendent, Mesquite ISD
~36,000 students, (~xx% lacking access)

Dr. Mark Henry
Superintendent, Cypress Fairbanks ISD
~117,000 students, (~xx% lacking access)

Dr. Rene Gutierrez
Superintendent, Brownsville ISD
~45,000 students, (~xx% lacking access)

Dr. Brian Woods
Superintendent, Northside ISD
~107,000 students, (~xx% lacking access)

Dr. Rodney Watson
Superintendent, Spring ISD
~45,000 students, (~xx% lacking access)

Linda Ellis
Superintendent, Grand Prairie ISD
~30,000 students, (~xx% lacking access)

Dr. Jennifer Blaine
Superintendent, Spring Branch ISD
~36,000 students, (~xx% lacking access)

Dr. Gilbert Garza, Jr.
Superintendent, Edinburgh ISD
~34,000 students, (~xx% lacking access)

Dr. Jose Espinoza
Superintendent, Socorro ISD
~47,000 students, (~xx% lacking access)

Dr. Sean Maika
Superintendent, North East ISD
~68,000 students, (~xx% lacking access)

Dr. Scott Muri
Superintendent, Ector County ISD
~33,000 students, (~xx% lacking access)

Dr. Orlando Riddick
Superintendent, Midland ISD
~26,000 students, (~xx% lacking access)

