

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

In the Matter of)	
)	
Modernizing the E-rate Program for Schools and Libraries)	WC Docket No. 13-184
)	
Schools and Libraries Universal Service Support Mechanism)	CC Docket No. 02-6
)	
Connect America Fund)	WC Docket No. 10-90

COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”), pursuant to the Public Notice released on September 19, 2016 (DA 16-1051), hereby respectfully submits its comments in support of the Petition for Waiver filed by Boulder Valley School District *et al.*, and the Petition for Clarification or in the Alternative, Waiver, filed by Microsoft Corporation *et al.*¹ Both sets of petitioners have requested that they be allowed to extend their E-rate-supported networks from school campuses to the homes of students who lack Internet access to enable these students to do their homework, and have advised that such extensions will not require additional E-rate funding. BVSD has requested that the FCC waive the cost allocation rule (Section 54.504(e)) for school districts that extend their self-provisioned network services to the homes of students who reside in affordable

¹ See Petition for Waiver of Boulder Valley School District and Samuelson-Glushko Technology Law & Policy Clinic (collectively, BVSD) filed on May 16, 2016; Joint Petition for Clarification or, In the Alternative, Waiver of Microsoft Corp., Mid-Atlantic Broadband Communities Corp., Charlotte County Public Schools, Halifax County Public Schools, GCR Co., and Kinex Telecom (collectively, Joint Petitioners) filed on June 7, 2016.

housing (p. 1). Joint Petitioners have requested clarification that E-rate rules allow them to deploy TV White Spaces (TVWS) technology in a pilot program to extend participating schools' E-rate supported Internet access service to the homes of approximately 3500 students who currently lack broadband access (p. 3). In the alternative, Joint Petitioners have requested that the Commission waive its presumption that E-rate supported "educational purposes" excludes off-campus connectivity (p. 4). Because these proposals to extend schools' E-rate supported networks to certain off-campus locations will help to address the homework gap, will simplify program administration, and will not add to the USF cost burden, Sprint supports both petitioners' requests.

The homework gap affects an estimated 5 million American households with school-aged children.² Sprint has long been at the forefront of efforts to address this very serious problem: in 2014, as part of President Obama's ConnectED initiative, Sprint implemented a program to provide free mobile broadband service to approximately 50,000 students. Last month, Sprint announced its 1 Million Project, under which Sprint has pledged to provide both free wireless service for up to four years, *and* a free device, to up to 1 million low income students who lack Internet access at home.³ These private efforts alone, however, cannot completely bridge the homework gap. Government policies should also be revised to address this chronic issue. Separate and apart from its charitable efforts, Sprint has also long argued that wireless services used for educational

² See *"The Numbers Behind the Broadband 'Homework Gap,'*" John Horrigan, Pew Research Center, April 20, 2015 (<http://www.pewresearch.org/fact-tank/2015/04/20/the-numbers-behind-the-broadband-homework-gap/>).

³ See <http://goodworks.sprint.com/1millionproject/?ECID=vanity:1millionproject>.

purposes outside of school should be eligible for full E-rate support.⁴ Accordingly, Sprint urges the Commission to grant the two petitions at issue here. Extending E-rate-supported broadband access service as described by petitioners, without requiring the schools to allocate out the cost of the off-campus mobile broadband service, will promote the public interest. Besides helping to bridge the homework gap at no incremental cost, waiver of the cost allocation rule will ease the schools' administrative burden and allay the concern that an inadvertent mistake in performing the cost allocation will cause the school to lose all or part of its E-rate support.

Sprint would caution that a waiver of the cost allocation rule where an E-rate-supported network is expanded to students' homes, does not mean that the network can or should be used to provide unlimited broadband access for the entire household. The network should be used only for educational purposes by the student, and the network should be extended only to those households that otherwise lack broadband access. Sprint also recommends that the waiver of the cost allocation rule be applied not only to a school's self-provisioned network or to a TVWS-based solution, but also to networks provided by broadband carriers as allowed under the E-rate eligible services list.

⁴ *See, e.g.*, Sprint comments filed on July 9, 2010, in CC Docket No. 02-6 and GN Docket No. 09-51, pp. 2-4.

Respectfully submitted,

SPRINT CORPORATION

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