

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:

Comments on Petitions Regarding)	CC Docket No. 02-06
Off-Campus Use of Existing E-rate)	WC Docket No. 10-90
Supported Connectivity)	WC Docket No. 13-184

**COMMENTS OF FUNDS FOR LEARNING, LLC
on
Petitions Regarding Off-Campus Use of Existing E-rate Supported Connectivity**

Funds For Learning, LLC (“FFL”) is a national, E-rate-compliance consulting and web services firm. Since the E-rate program began 19 years ago, FFL has dedicated itself exclusively to the needs of E-rate stakeholders. Our clients include some of the country’s smallest and largest E- rate applicants.

The Commission is seeking comments on “two petitions that seek to allow schools and school districts to leverage existing E-rate supported services to allow Internet traffic originating at students’ homes to be directed to and carried over E-rate supported networks without creating an obligation on the applicant to cost allocate out the portion of the traffic attributable to off-campus use.” FFL fully supports both petitions and urges the Commission to adopt rules and/or rule clarifications to implement them as quickly as possible.

What the petitioners are essentially proposing is a logical, long overdue extension of the E-rate program’s 2010 Community Use rules. Those rules expanded affordable broadband access to the Internet by allowing schools to invite the general public into their buildings to use their E-rate-supported services when school was not in session and so long as the additional use cost nothing to provide. Because the Community Use rules expanded the public benefits of using E-rate funds at no additional cost to the E-rate program, the Commission was justifiably enthusiastic about enacting them.

The Commission should adopt the changes and/or clarifications being proposed with even greater enthusiasm. Their positive impact on public policy will be even more profound, as they will “virtualize” the Community Use rules. Instead of having to physically enter a school building after school hours to use its Internet connection, students (and the local community we hope) could access the Internet by simply visiting the school building electronically. Besides the obvious benefits of this kind of change, an added bonus would be increased school security and public safety: no one would physically have to enter the school building or venture out into the dark or in bad weather to get to the school building to use the Internet connectivity there.

The instant petitions bear witness to the unfortunate fact that there exists today in America an electronic “homework gap” that must be bridged. According to Pew Research, a third of all households in America lack broadband Internet access, and nearly half of those without Internet do so not out of choice but because they cannot afford it.¹ Every child in this country is entitled to a quality education, and in today’s fast-paced, electronic world, that requires high-speed Internet access *at home*.² Commissioner Rosenworcel in particular has gone to great lengths to publicize this problem and to champion solutions to it. We applaud all of the Commissioners for their efforts in this regard. THIS is the Commission’s opportunity to step up to the plate and to hit the ball out of the park.

Data Supporting the Petitions

The E-rate program has been largely responsible for connecting our nation’s schools and libraries to the Internet. Now, at no additional cost to the program, to the service providers who fund the USF, or to the American telecom consumers who fund it indirectly, the E-rate program has the opportunity to achieve even more. The data shows that the program can easily open up the Internet to large numbers of low-income families in their homes because of how close E-rate supported networks are to where they live.

Using data from the Department of Housing and Urban Development³, combined with FFL’s own database of E-rate funding recipients, we have analyzed the distance⁴ from every public housing development in the United States to the nearest school or library facility with an

¹ <http://www.pewinternet.org/2015/12/21/home-broadband-2015/>

² <https://www.fundsforlearning.com/blog/2016/03/bringing-broadband-home>

³ “Public Housing Development” dataset available at <http://egis.hud.opendata.arcgis.com/datasets>

⁴ Geocoding services were provided by the Texas A&M University GeoInnovation Center

E-rate funded Internet connection. The table below summarizes this first of its kind analysis.

Count of Public Housing Developments and Population By Distance from E-rate Funded School or Library ⁵			
Distance to School or Library	Housing Count	Population Count	% Pop'l
< .1 miles	571	310,534	15.2%
.1 to .24 miles	1,782	631,277	30.8%
.25 to .49 miles	2,297	609,462	29.8%
.50 to .99 miles	1,512	378,993	18.5%
1.0 to 2.0 miles	350	75,006	3.7%
2.0 or more miles	322	41,628	2.0%
Total	6,834	2,046,900	

As the table above shows, there are 941,811 Americans living in public housing developments who reside within less than a quarter mile of a school or library with an E-rate supported network. It shows too that over 94% of the public housing population, a staggering 1,930,266 people, live less than a mile from an E-rate funded facility. To illustrate the significance of this data, we have attached several charts and tables, which you will find in Exhibit A.

For hundreds of thousands of low-income individuals and families, E-rate funded networks are within walking distance of home. The bottom line, therefore, is this: By allowing community members, such as those who reside in public housing developments, to connect to E-rate funded networks, the FCC will open up new opportunities for “last mile” connections for many millions of Americans who are currently residing on the wrong side of the digital divide.

⁵ E-rate sites are based on the schools and libraries listed on FY2016 Form 471 applications.

Respectfully Submitted,

/s/ John D. Harrington

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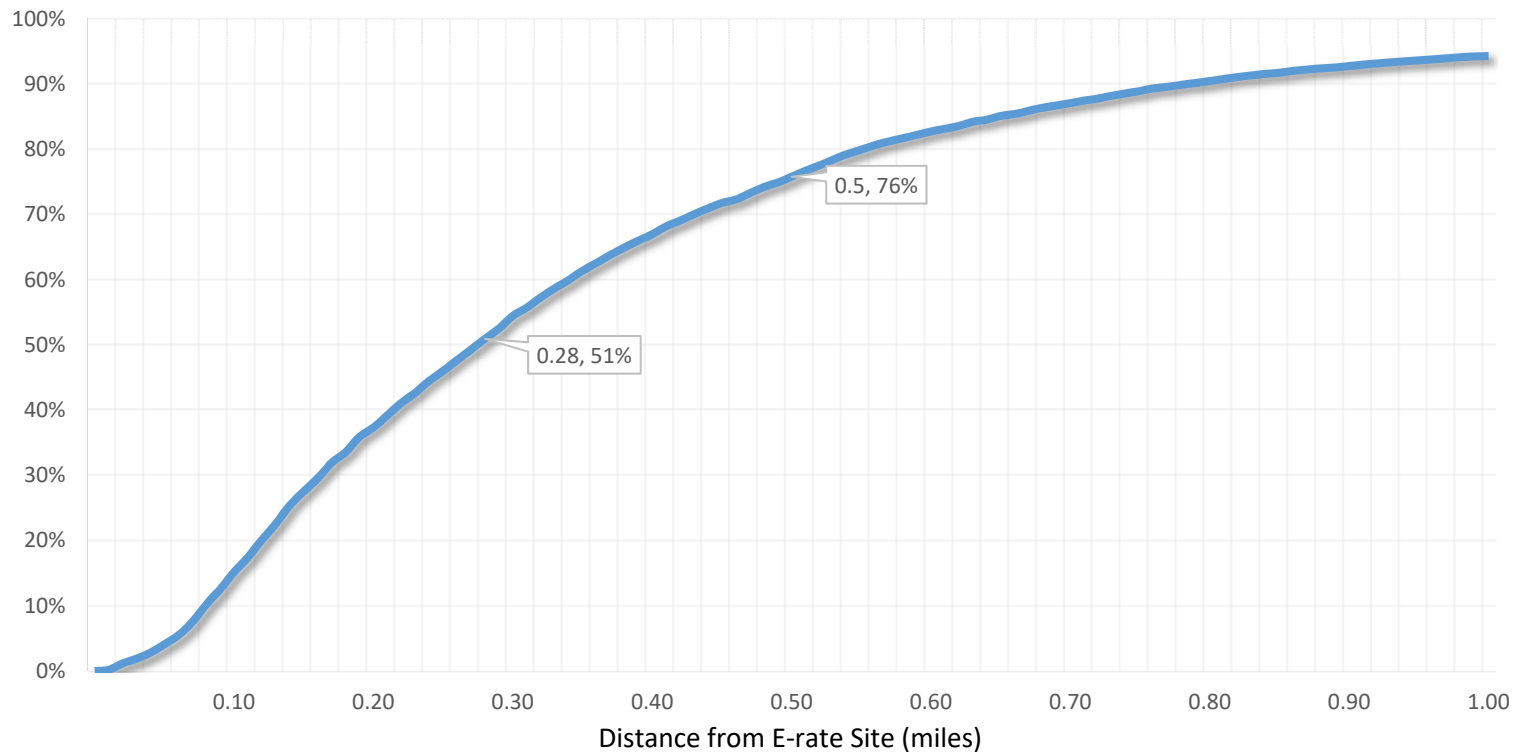
November 3, 2016

cc: Commissioner Jessica Rosenworcel

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EXHIBIT A

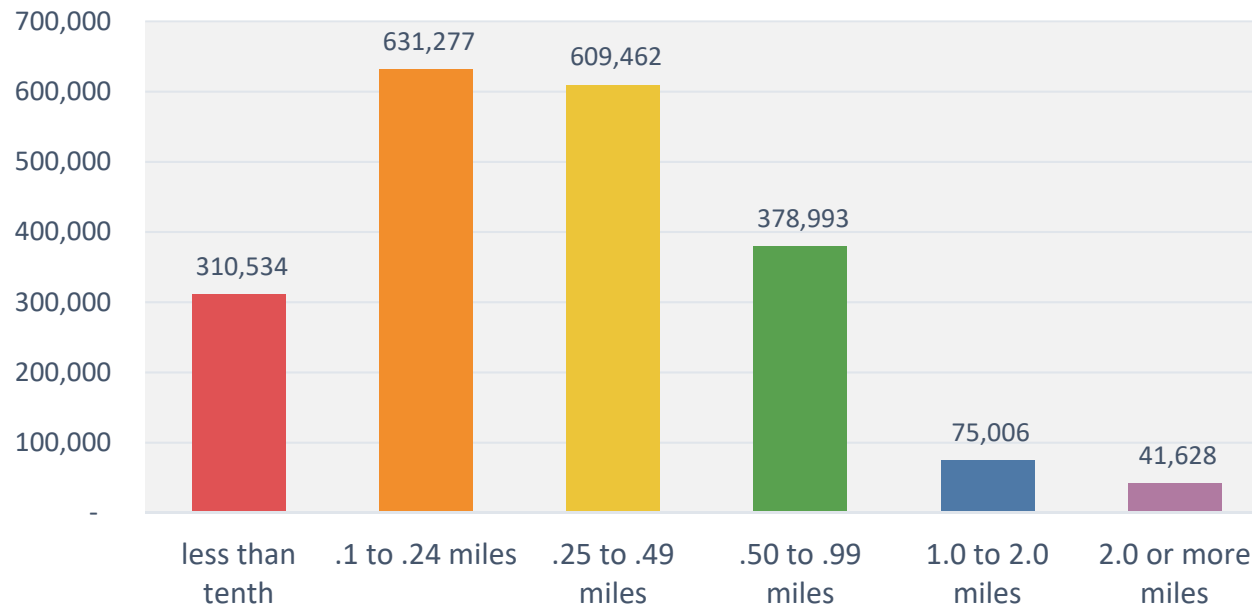
Public Housing Near E-rate Funded Sites Cumulative % of Population by Distance (miles)



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Sources: E-rate Manager®, HUD eGIS System

Public Housing Population Near E-rate Funded Sites

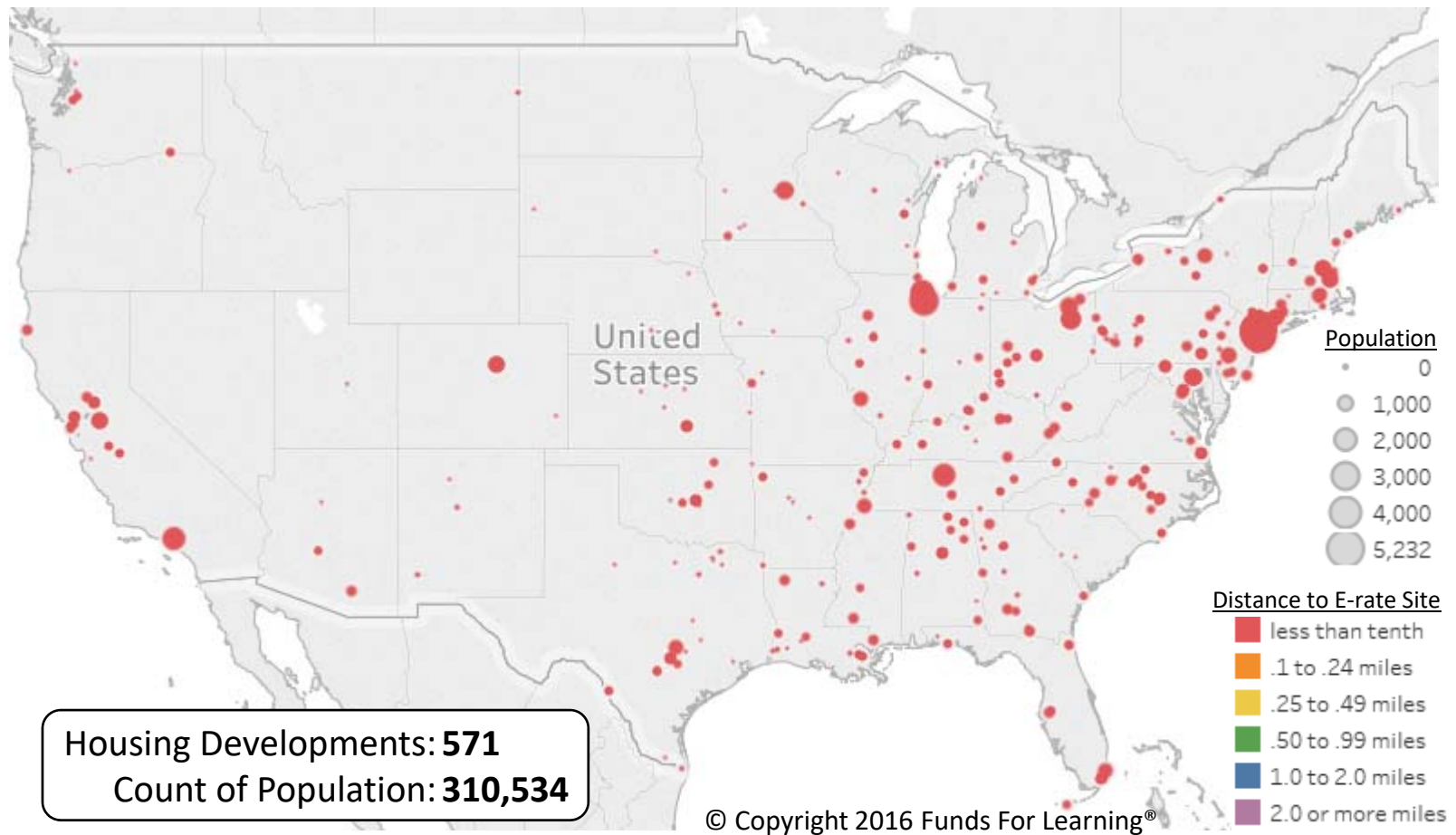


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Sources: E-rate Manager®, HUD eGIS System

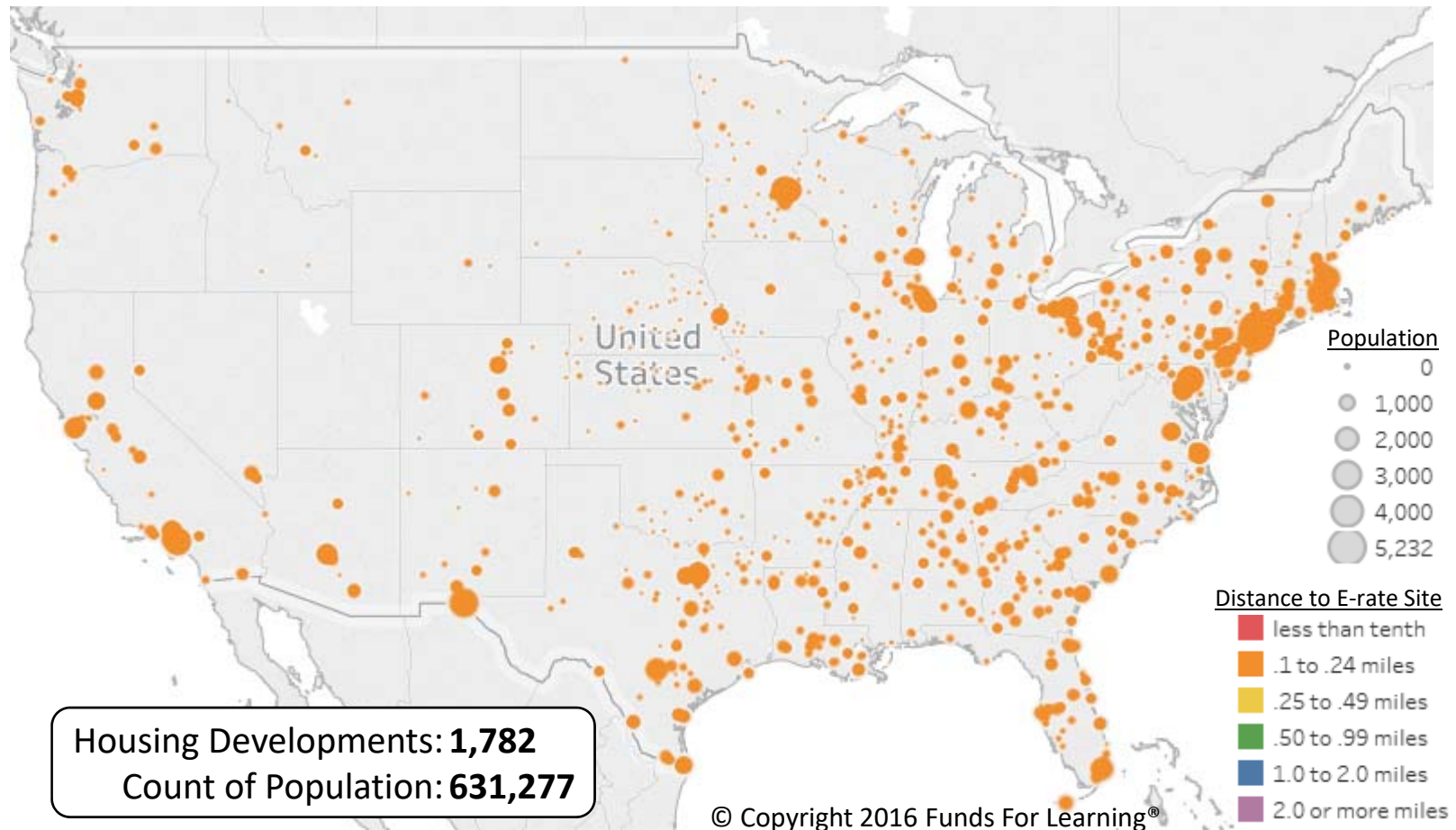
Public Housing Developments Near E-rate Funded Schools or Libraries

-- Housing less than 0.10 miles --



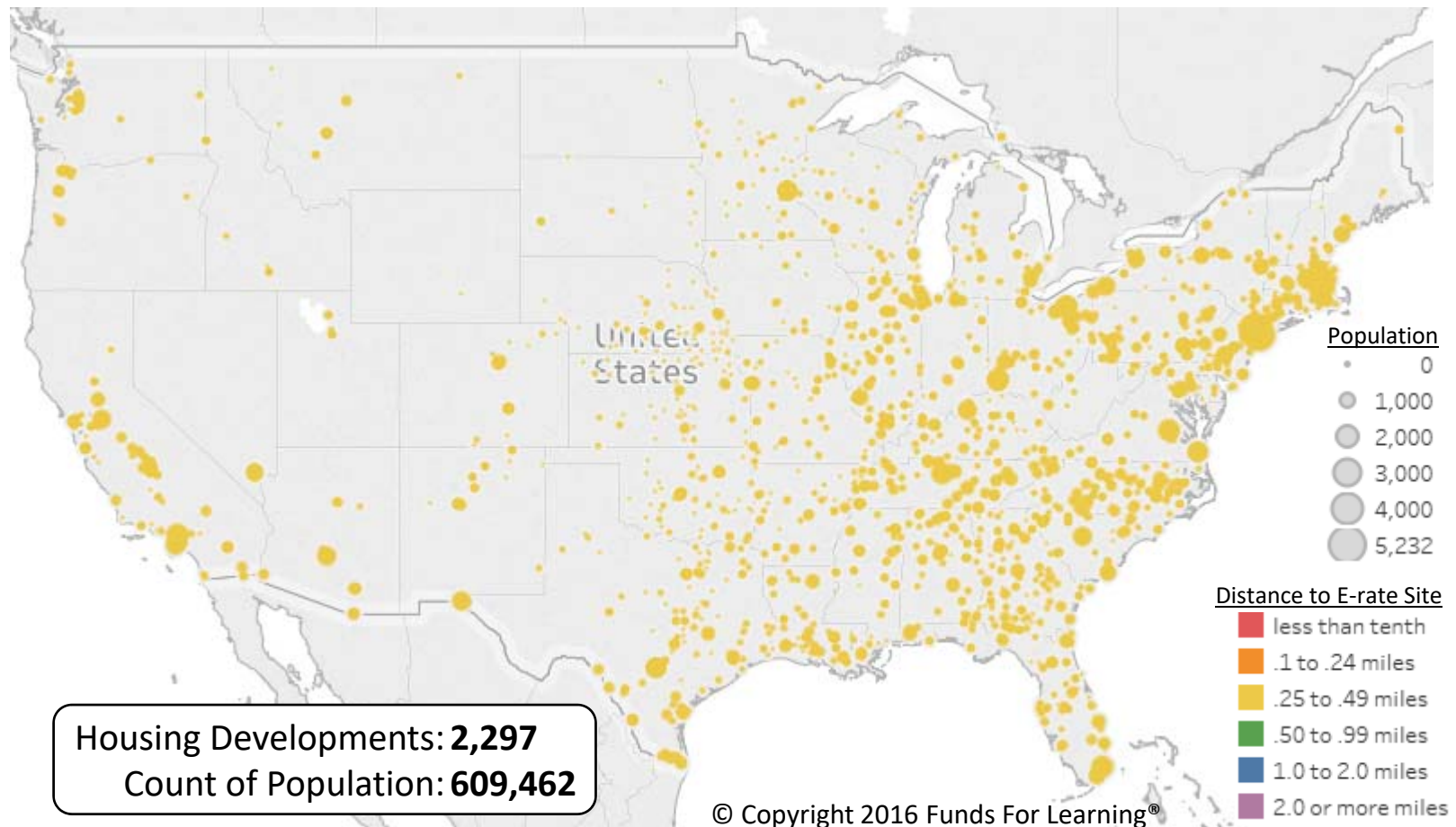
Public Housing Developments Near E-rate Funded Schools or Libraries

-- Housing 0.10 to 0.24 miles --



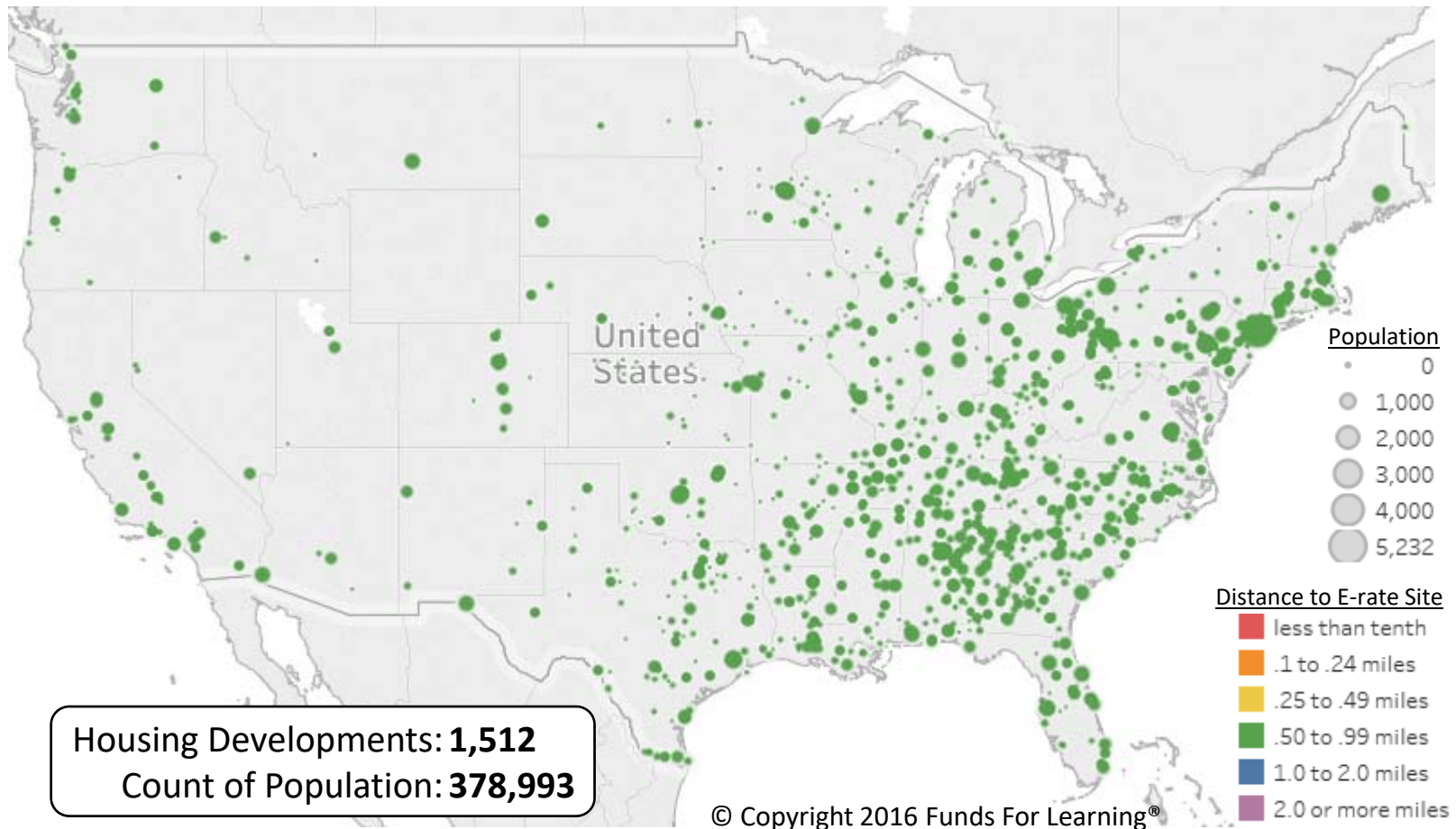
Public Housing Developments Near E-rate Funded Schools or Libraries

-- Housing 0.25 to 0.49 miles --



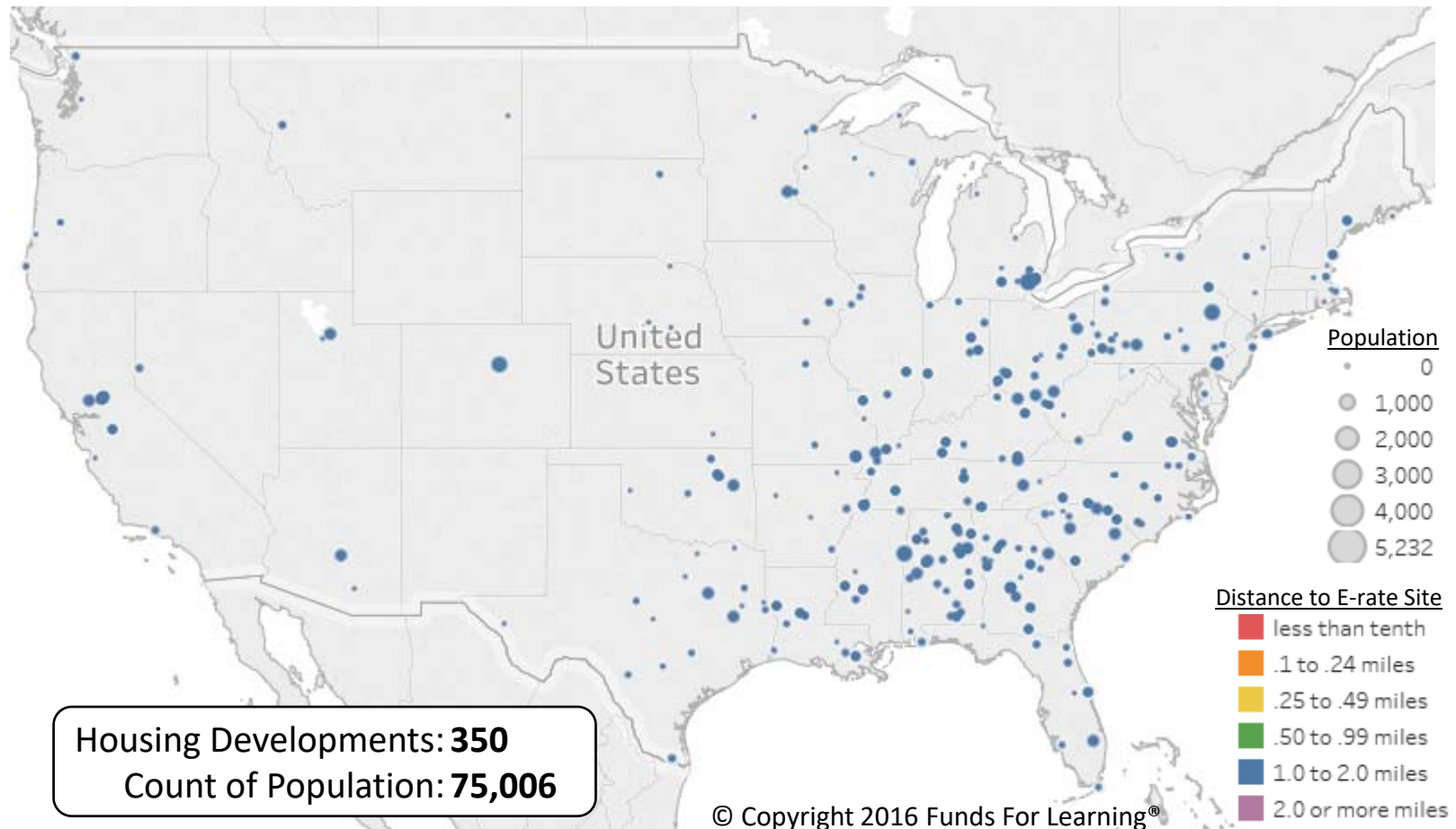
Public Housing Developments Near E-rate Funded Schools or Libraries

-- Housing 0.50 to 0.99 miles --



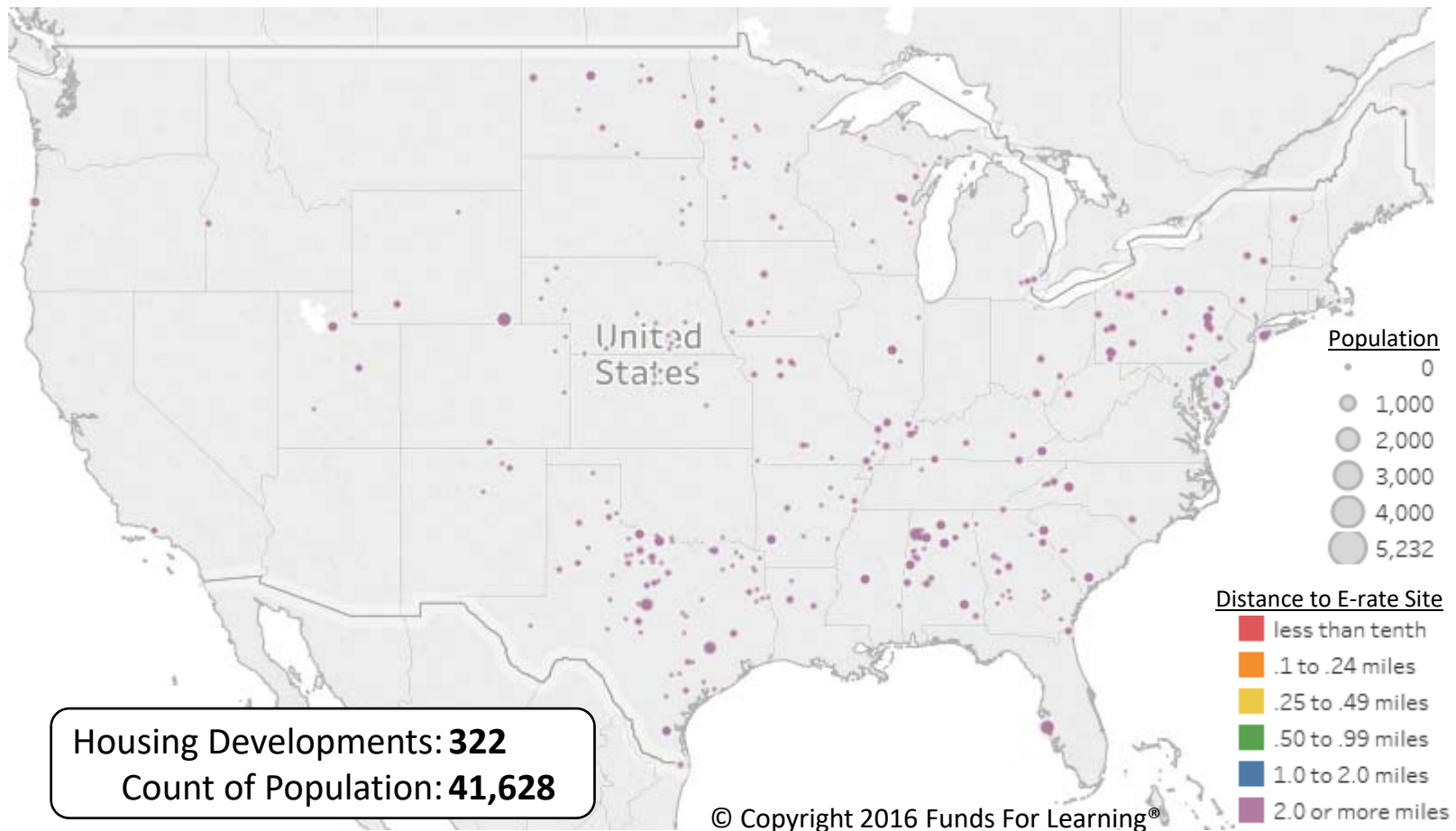
Public Housing Developments Near E-rate Funded Schools or Libraries

-- Housing 1.0 to 2.0 miles --



Public Housing Developments Near E-rate Funded Schools or Libraries

-- Housing 2.0 or more miles --



Number and Population of Public Housing Developments
by Distance from E-rate Funded Sites and by State

	Public Housing Developments				Population by Distance (miles) to E-rate School/Library						
State	Count	Distance (miles) to E-rate Site			<0.10	0.10 to 0.24	0.25 to 0.49	0.50 to 0.99	1.00 to 2.00	2.00+	Grand Total
		Median	MIN	MAX							
AK	11	0.43	0.07	49.05	515	491	1,458	126		57	2,647
AL	276	0.53	0.01	15.45	3,020	7,529	20,439	28,610	7,912	4,288	71,798
AR	116	0.43	0.01	14.03	1,350	3,489	9,000	8,586	578	908	23,911
AZ	48	0.26	0.04	1.30	888	6,274	7,180	1,653	499		16,494
CA	211	0.28	0.02	2.02	9,636	33,938	26,690	10,349	2,658	121	83,392
CO	70	0.44	0.03	25.48	1,264	4,782	3,831	6,102	1,205	257	17,441
CT	131	0.25	0.01	0.99	4,204	9,235	8,811	5,432			27,682
DC	61	0.19	0.05	0.41	2,001	8,828	4,631				15,460
DE	23	1.10	0.09	12.17	113	0	600	928	1,734	1,107	4,482
FL	227	0.37	0.04	13.57	4,103	20,405	25,804	15,430	2,245	947	68,934
GA	327	0.45	0.00	11.51	3,815	14,595	23,413	23,616	5,063	1,749	72,251
HI	17	0.28	0.05	2.86	1,861	2,844	7,313	710	309	567	13,604
IA	54	0.39	0.07	12.60	61	1,025	2,443	1,308	780	570	6,187
ID	10	0.40	0.20	0.64		190	550	663			1,403
IL	363	0.28	0.01	8.10	13,018	26,341	31,569	11,885	1,670	1,882	86,365
IN	105	0.37	0.02	1.23	1,570	7,874	9,363	6,533	1,950		27,290
KS	109	0.30	0.04	5.76	1,274	3,817	6,727	2,445	47	81	14,391
KY	165	0.39	0.01	13.36	3,482	8,383	14,614	10,681	3,325	854	41,339
LA	173	0.38	0.01	4.26	2,430	8,927	17,209	10,214	2,002	411	41,193
MA	207	0.25	0.02	4.12	7,360	25,878	23,248	6,184	550	49	63,269
MD	106	0.23	0.02	10.65	4,947	16,803	4,032	2,417	221	317	28,737
ME	26	0.30	0.04	6.05	741	1,582	3,876	1,595	481	235	8,510
MI	200	0.50	0.01	7.76	1,755	6,863	10,703	13,634	5,036	659	38,650
MN	159	0.34	0.03	15.84	2,333	13,096	10,188	8,471	1,064	1,056	36,208
MO	163	0.36	0.04	13.66	2,020	8,056	10,705	7,414	2,073	1,124	31,392
MS	80	0.45	0.01	16.76	1,373	2,873	6,933	8,157	3,033	400	22,769
MT	20	0.39	0.07	1.25	134	696	2,321	837	299		4,287
NC	286	0.38	0.00	7.84	5,305	10,657	28,534	16,608	3,389	1,366	65,859

Number and Population of Public Housing Developments
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State	Count	Distance (miles) to E-rate Site			<0.10	0.10 to 0.24	0.25 to 0.49	0.50 to 0.99	1.00 to 2.00	2.00+	Grand Total
		Median	MIN	MAX							
ND	23	2.17	0.15	52.60		377	29	979		1,563	2,948
NE	127	0.32	0.06	22.49	319	2,914	6,058	2,864	86	240	12,481
NH	26	0.36	0.17	1.87		2,010	3,422	1,022	390		6,844
NJ	239	0.21	0.01	1.23	8,669	28,215	18,088	4,546	237		59,755
NM	40	0.32	0.05	12.53	384	2,253	4,358	1,899		217	9,111
NV	20	0.24	0.14	1.03		3,162	3,119	794	303		7,378
NY	382	0.18	0.01	4.44	185,548	176,930	54,356	20,493	1,811	1,425	440,563
OH	241	0.35	0.03	2.71	8,198	19,577	33,211	18,589	3,750	751	84,076
OK	112	0.42	0.03	9.94	1,630	2,519	8,549	7,603	1,889	117	22,307
OR	74	0.41	0.10	15.39	70	2,261	4,625	2,924	374	574	10,828
PA	427	0.32	0.02	14.66	8,059	36,913	33,664	23,708	3,909	4,843	111,096
PR	31	0.64	0.13	2.17		199	3,758	8,560	948	876	14,341
RI	67	0.20	0.04	1.19	2,546	8,256	3,144	1,224	56		15,226
SC	103	0.52	0.01	6.61	64	5,273	11,824	9,811	2,463	669	30,104
SD	24	0.41	0.07	13.36	159	338	920	779	180	113	2,489
TN	192	0.41	0.05	2.47	4,818	15,866	23,643	17,916	4,165	102	66,510
TX	476	0.40	0.02	37.92	3,959	39,092	37,682	21,403	2,647	7,644	112,427
UT	16	0.82	0.09	43.61	19		901	1,574	533	615	3,642
VA	135	0.32	0.02	2.44	1,954	12,772	16,464	8,085	1,485	411	41,171
VT	11	0.40	0.07	2.19	272	217	799	761		212	2,261
WA	126	0.30	0.01	1.16	1,347	8,143	8,751	5,431	292		23,964
WI	139	0.34	0.07	14.42	821	6,498	7,699	3,842	138	875	19,873
WV	52	0.52	0.06	3.86	1,125	1,760	2,167	3,598	1,227	276	10,153
WY	7	13.43	0.15	30.41		261	46			1,100	1,407
Overall	6,834	0.34	0.00	52.60	310,534	631,277	609,462	378,993	75,006	41,628	2,046,900