

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

In the Matter of:

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

**REPLY COMMENTS  
FROM THE CLEVELAND METROPOLITAN SCHOOL DISTRICT**

The Cleveland Metropolitan School District (“CMSD”) is submitting these comments to register our strong support of the many comments the Commission received urging it to permit after hours use of E-rate eligible school networks in order to bring broadband Internet access to students in their homes. Our school district, the second largest in Ohio, includes 96 schools in an 82 square mile area. One hundred percent of our students receive free or reduced price lunch.

In Cleveland, because of the number of households without Internet access, the “Homework Gap” problem is immense. The statistical data below illustrates just how bad the problem actually is:<sup>1</sup>

- Total city households: 167,667
- 38% of households have no Internet access
- 78.3% of households with income up to \$34,999 have no Internet access.
- 40.8% of households with income between \$35,000 and \$49,999 have no Internet access.

The intensity of global competition demands that students in Cleveland and elsewhere build the knowledge, skills and attributes that position them to be successful and competitive in the 21st century global economy. In today’s world, that requires

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<sup>1</sup> Results of 2015 American Community Survey, a copy of which is attached. *See, also*, the following articles published on the Connect Your Community website: *Updated maps show no-broadband majorities in most Cleveland and Detroit neighborhoods* (April 26, 2016) <http://connectyourcommunity.org/updated-maps-shows-no-broadband-majorities-in-most-cleveland-and-detroit-neighborhoods/>; *FCC’s new data on 10mbps connections shows stark city-suburb contrasts for Cleveland, Detroit* (August 26, 2016) <http://connectyourcommunity.org/fccs-new-data-on-10-mbps-connections-shows-stark-city-suburb-contrasts-for-cleveland-detroit/>; and *New Census: No Internet connection for 52,000 Cleveland homes* (September 21, 2016) <http://connectyourcommunity.org/new-census-no-internet-connection-for-52000-cleveland-homes/>

broadband Internet access both at school and at home. Students who do not have this kind of access at home are going to find it increasingly difficult to keep up, because their own education and the world around them is moving increasingly online. That is why it is more important than ever for every student to have broadband Internet access at home. It follows of course that the longer it takes for that to happen, the higher the number of students there will be who will suffer from this lack of access at home and the greater the harm from it will be.

Bringing Internet connectivity into the homes of every student in our school district is going to require a team effort from CMSD, the local community, and the Commission. We are ready to do whatever we possibly can to help. As the State of Nebraska Office of the CIO and Dept. of Education's so aptly stated in their comments, this is a matter of national importance and tremendous urgency:

Given the national importance and public interest of connecting all students to high capacity broadband and the nature of the deadline, the State CIO and Nebraska Department of Education urge the Commission to allow E-rate subsidized broadband networks to be accessed by students at home for educational purposes, without requiring the E-rate applicant to cost allocate their portion of the traffic attributable to off-campus use.

That large numbers of our students have to hunt around the city after school for Internet connectivity to do their homework, because they have no Internet access at home, is terribly disheartening. But with the Commission's help, we believe strongly that we can find a way to turn this situation around. We look forward to the day when hunting for Internet access after school becomes nothing but a bad memory, a story that our former students tell to their own children, who, we can only hope, will find the story impossible to believe.


Accordingly, we join with the other commenters who are urging the Commission to adopt a broad waiver or clarification of the E-rate rules and not to waste valuable time engaging in unnecessary experimentation. We urge the Commission to give permission to all eligible schools -- not only the schools covered by the petitions -- to let their students use their school's E-rate supported services to access the Internet from home when those services would otherwise be idle -- i.e., after school, weekends, and holidays. A broad waiver would enable schools and school districts across the country to reach out to local businesses and organizations and national ones too to help develop and implement innovative, local, telecommunications solutions to their respective Homework Gap problems.

What is being proposed in the petitions is not deceptively simple. It actually is that simple. It does not make the E-rate application or review process any more complicated. And as many other commenters have noted already, there is no economic risk to the E-rate program that comes from permitting schools to let their students use their fixed cost, E-rate supported networks from home when school is not in session. Since the amount of paid bandwidth available at any given time on virtually every school network is going to be finite, letting students use this bandwidth, especially when virtually no one else is, cannot possibly cost the school, and therefore the E-rate program, any more money.

The Commission decided to allow schools to welcome their local communities into their buildings after school hours to connect to their networks to access the Internet, because there would be no additional cost to the program as a result of this extra use. For exactly the same reason, the Commission should decide in this proceeding to allow schools to welcome their students on to their own school's networks after school in order to access the Internet from home.

Finally, we wish to respond to a concern raised in at least one comment about the additional burden on school administrators that might result from giving students broadband access to E-rate supported school networks from home. In our opinion, the answer to this concern is really quite simple: the undertaking is completely voluntary. If a school or school district does not want to take on whatever administrative work happens to come with a project like this, it does not have to do so. We at CMSD are excited about the opportunity to be so burdened.

Respectfully submitted,

  
December 5, 2016