

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	CC Docket No. 02-6
Petitions Regarding Off-Campus Use Of	)	
Existing E-Rate Supported Connectivity	)	WC Docket No. 10-90
	)	
Schools and Libraries Universal Service	)	WC Docket No. 13-184
Support Mechanism	)	

**REPLY COMMENTS OF THE  
COUNCIL OF THE GREAT CITY SCHOOLS**

The Council of the Great City Schools, the coalition of the nation’s largest central-city school districts, is pleased to submit reply comments to the Commission’s Public Notice regarding the off-campus use of E-Rate networks for educational purposes (DA 16-1051, CC Docket No. 02-6, WC Docket No. 13-184, WC Docket No. 10-90).

**Introduction**

The Council of the Great City Schools includes 70 of the nation’s largest urban school districts that represent less than one-half of one percent of the approximately 17,000 school districts in the U.S., yet enroll over 7 million students, including approximately 25 percent of the nation’s Hispanic students, 30 percent of the nation’s African American students, and 25 percent of the nation’s children living in poverty. The value of the E-Rate is apparent every day to the members of the Council, as we serve the highest numbers and concentrations of disadvantaged children, employ the largest number of teachers, and operate in the greatest number of outdated and deteriorating buildings and neglected neighborhoods.

The Council is encouraged by the Commission’s consideration of these petitions and we support allowing the use of E-Rate networks off-campus. The Commission is well-aware of the value that access to technology can provide to students both during and after the school day, and a number of commenters highlighted the importance of closing the “homework gap” for students without internet access at home. As Microsoft stated in their petition, “...these students face an enormous educational barrier: unlike their connected peers, they cannot use a home internet connection to collaborate with their classmates on homework assignments, participate in discussion boards, research assignments online, apply to colleges or for scholarships, or otherwise develop the skills necessary to compete in the digital economy.”

## **Academic Benefits of Home Internet Access**

Beyond issues of equitable access, of particular concern to the Council is the subsequent educational deficit that results for students that do not have internet access once they leave their school. Recent administrations of the National Assessment of Educational Progress (NAEP) demonstrate in academic terms the benefit that home internet access has on student assessment results. We highlight the NAEP results for fourth graders that show significantly higher achievement levels for the students who indicated having home internet access.

Nationwide, the percentage of students scoring at or above proficient was 25-30 points higher for students with home internet access in the 2013 and 2015 NAEP results for Math. In Reading results for the same years, the percentage of students scoring at or above proficient was about 25 points higher for students that indicated having home internet access on NAEP's secondary survey. While other factors also contribute to the proficiency differential, the significant academic benefit for students with home internet access is evident both at the national level and in NAEP's "Large City" group, as well as when breaking down the assessment data for minority students, English learners (EL), and students eligible for the National School Lunch Program (NSLP).

In October 2015, the National Center for Educational Statistics (NCES) published a paper titled, "Performance of fourth-grade students in the 2012 NAEP computer-based writing pilot assessment." Consistent with the Reading and Math results discussed above, NCES found that students with internet access at home – and therefore prior and greater exposure to writing on a computer – were more likely to write longer responses, use editing tools more frequently, and score better on the writing tests. This same study also found the percentage of fourth-graders who did not have access to the Internet at home was higher for Black and Hispanic students than White or Asian students, NSLP-eligible students than NSLP not-eligible students, EL students than non-EL students, and students with a disability, compared to students with no disability.

## **Support from Urban School Districts**

Recognizing both the equity value and the academic importance of delivering home access to students, urban school systems have expressed their support for the petitioners. The Los Angeles Unified School District (LAUSD) serves a diverse ethnic and economic student population, with approximately 77% of the student population qualifying for free or reduced price meals. Efforts to provide access to online resources on LAUSD campuses, through the efforts of local bond and E-Rate initiatives, have been highly successful, but there is still great inequity in internet access off-campus and in the home environment, particularly in lower socio-economic neighborhoods. The Los Angeles Unified School District enthusiastically supports the petitions authorizing E-Rate networks for off-campus use.

Being able to extend LAUSD's network and internet service to off-campus and the home for the purposes of students obtaining educational resources related to their school work will greatly help close the "internet access gap." Closing this "gap" will enable students to take what they have learned during the school day and apply it to school projects, homework, and other required assignments. Approving the petitioners' requests also recognizes that in the past, instructional

resources for students came in the form of textbooks and other print media. Today, LAUSD and many districts provide instructional resources both in traditional print media and online, and students should have off-campus and home access to online learning resources like they already do with print media.

A number of Council districts also submitted comments supporting the petitioners, and we echo their support to extend the benefits of the E-Rate to students after they have left school for the day.

- The New York City Department of Education urged the Commission to waive the cost-allocation requirements for off-campus use to eliminate unnecessary cost and administrative burden for applicants, while fostering, “innovative uses of E-rate funded services that would reach far beyond the classroom.”
- The Detroit Public Schools also backed the petitioners’ request to the Commission, and noted that in approving the waivers, “...the Commission would expand the benefits of using E-rate funds and that it is in the public interest to allow greater use of government-supported services and facilities during those times when schools are out of session, particularly because that enhanced access comes at no additional cost to the E-rate program.”
- The Cincinnati Public Schools has been working to further their District Equity Agenda, and currently provides approximately 1,000 students with hotspots for home internet access. But the district serves 35,000 students, over 80% of whom are economically disadvantaged, and has also been exploring more cost-effective alternatives that will benefit even more of their neediest students. The changes sought by the petitioners would help Cincinnati further its goal, and the district noted that positive action by the Commission will help eliminate disparities among students and schools.
- The Sacramento City Unified School District explained that their district employs a broad range of applications and systems that empower students to learn, engage, innovate, create and collaborate within the classroom. They also noted in their comments, however, that, “...the realized impact of these tools is significantly diminished by a lack of ubiquitous access to the Internet at home. The ‘digital divide’ in many cases exacerbates social, environmental and economic disparities that already exist among our student population. Equitable access to the Internet is essential to our ability to effectively prepare students for college, careers, and productive contribution to the community.”

As both the Public Notice outlined and commenters observed, the Commission has taken action in recent years acknowledging the importance of internet access beyond the school day. The “community use” changes approved by the Commission in 2010 authorized school districts to allow the general public to utilize services and facilities supported by E-Rate after school hours. In the same year, the Commission examined the benefits of off-premise wireless connectivity for both schools and libraries through the Learning On-The-Go pilot program. Urban schools supported these FCC’s actions, and the benefit and importance of ubiquitous internet access for students has only increased in the years since.

## Conclusion

The Council of the Great City Schools urges the Commission to grant the petitions regarding off-campus use of E-Rate networks. The waivers sought do not add to the cost of the program and the benefits for students and schools are in the public interest and, “consistent with the overarching goals of universal service to promote access to telecommunications and information services.” We also agree with petitioner Boulder Valley School District that these changes will incentivize school districts to participate in projects expanding Internet service to students in need. The E-Rate has allowed city school districts to access the benefits of digital learning, and the program has helped many students and schools integrate the technology, media, and information-rich instructional content that is a necessary part of modern education. The changes requested by the petitioners will help ensure the benefits of the E-Rate continue to close the digital divide for students, regardless of their income level or their location.

Respectfully Submitted,



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