

July 28, 2021

**VIA ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

Re: *Schools and Libraries Universal Support Mechanism* (WC Docket No. 02-6)  
*Emergency Connectivity Fund* (WC Docket No. 21-93)

Dear Ms. Dortch:

USTelecom – The Broadband Association writes in response to the *ex parte* submission filed by various education groups in this docket on July 16, 2021.<sup>1</sup> USTelecom supports the request that the Wireline Competition Bureau (WCB) extend its temporary waivers of the Federal Communications Commission’s gift rules applicable to the Rural Health Care (RHC) and E-rate programs to assist rural health care providers and schools and libraries affected by the COVID-19 pandemic.<sup>2</sup>

As the education groups point out WCB extended this waiver through June 30, 2021, due to the ongoing pandemic, and then subsequently, the full Commission granted a waiver of the FCC’s gift rules related to the new Emergency Connectivity Fund (ECF) through June 30, 2022, a program designed specifically to respond to the extraordinary needs of schools and libraries to meet the remote learning needs of students, school staff, and library patrons during the pandemic. USTelecom agrees with the education groups that, “it is incredibly confusing for schools and libraries and to determine when the gift rules apply under different programs [that provide] the same basic services.”<sup>3</sup> WCB should therefore correct this inconsistency and extend the E-rate gift rule waiver until June 30, 2022 so as to be consistent with the Emergency Connectivity Fund gift rule waiver.

---

<sup>1</sup> Letter from John Windhausen, Jr., Executive Director, Schools, Health & Libraries Broadband Coalition, Keith Kruger, CEO, Consortium for School Networking, Julia Fallon, Executive Director, State Educational Technology Directors Association, Debra M. Kriete, Chair, State E-rate Coordinators’ Alliance, Senior Policy Advocate, Public Policy and Advocacy Office, American Library Association, to Kris Montieth, Chief, Wireline Competition Bureau, FCC, WC Docket No. 02-6 (filed Jul. 16, 2021) (*Education Groups Ex Parte*).

<sup>2</sup> *In the Matter of Rural Health Care Universal Service Support Mechanism, Schools and Libraries Universal Service Support Mechanism*, Order, 35 FCC Rcd 14544 (Dec. 14, 2020).

<sup>3</sup> See *Education Groups Ex Parte* at 1.

Marlene H. Dortch, Secretary  
Federal Communications Commission  
July 28, 2021  
Page 2

Please contact the undersigned with any questions.



---

B. Lynn Follansbee,  
Vice President, Policy & Advocacy