



Feb 9, 2022

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

**Re: Ex Parte Filing**

Establishing Emergency Connectivity Fund to Close the Homework Gap, WC Docket No. 21-93;  
Modernizing the E-rate Program for Schools and Libraries -- WC Docket No. 13-184

Dear Madam Secretary:

Pursuant to Federal Communications Commission's *ex parte* rules, I hereby submit the following summary of our February 7, 2022 conversation with Ramesh Nagarajan in Chairwoman Rosenworcel's office to discuss the need for an extension of time for schools and libraries to use their funding from the Emergency Connectivity Fund (ECF). The following individuals participated in the call along with the undersigned:

Chantez Neymoss, Interim Chief Strategy and Innovation Officer, Charlotte Mecklenburg Library.

Elaine Williams, CEO of ConnectED Consulting Services, LLC, on behalf of the Puerto Rico Department of Education.

Phillip Essington, Director of Broadband & Digital Inclusion, Hennepin County, Minnesota.

Michael Flood, Senior VP and GM, Education for Kajeet.

The participants in the call made the following points:

- Chantez Neymoss: The Charlotte Mecklenburg Library is currently experiencing response delays and supply issues related to our approved funding request of \$8 million for 20,000 laptop computers. These delays are hindering our ability to carry out the program at the scale we had hoped. The current vendor cannot provide devices on credit, and the Library has no funding to purchase the devices and services up front. So the Library had to wait until it received USAC approval before moving forward on the purchase of devices and services. In January 2022, we received new advice from USAC regarding pre-reimbursement (which was discontinued despite its inclusion in the original ECF Order), which will delay when we can begin distribution of devices. The

Library is now going through an RFP process to get vendors. The Library will only be able to spend a fraction of its ECF award by June 30, 2022.

- Elaine Williams: The Puerto Rico Department of Education has 857 schools, 265,000 students, and 33,000 teachers. The PRDE conducted a survey and found that 61% of students and 80% of teaching staff did not have sufficient internet at home for remote learning and teaching, which made it difficult for the students to use the laptops and iPads that the school district issued. The PRDE received approval for about \$70 million in funding in November, 2021. Unfortunately, two service providers notified the PRDE that they could not supply the initially scheduled devices on time because of supply chain problems. So the vendors had to find a more readily available product. The PRDE submitted a service substitution request, which was filed with USAC Nov. 23, and which was approved Dec. 30. Then the PRDE launched its program on Jan. 17, 2022. USAC staff has been very responsive, but the fact is that the program will only benefit students for a portion of the second semester despite everyone's best efforts.
- Additional time is also needed to deliver the Wi-Fi hotspots to approved participants. In the 3 weeks since the Department's Wi-Fi hotspot program launched, 92,000 applications for devices have been approved, but only 31,500 participating households (34%) have received the devices. Each device is handed out in person or distributed by mail. It is moving smoothly but it takes time. It may take another 30-60 days to distribute all of the 188,000 Wi-Fi hotspots approved by USAC. At the same time, the best estimate is that \$20-30 Million will be unused by June 30 because of approval and distribution delays. It would be a huge benefit for the students and teachers if the PRDE could use this awarded funding for the next school year to complete distribution of the devices and for internet service. The PRDE is deeply worried about what to do if the program is not extended. For them, providing emergency relief for only 4-5 months would almost be worse than no relief, given the tremendous amount of time and effort it has taken to prepare for equipment distribution, service commencement and compliance reporting.
- Phil Essington: Hennepin County is the largest county in Minnesota including Minneapolis and several surrounding towns, and including 22 school districts. The Hennepin County grant is rather modest: \$489,000 allocation. The challenge is that staffing and support could not start until the application was approved in November. The vendors wanted new contracts for the distribution of devices and service, so there was additional legal wrangling, which took more time. The County is scheduled to launch the program this Wednesday, Feb. 9, which is well behind where it wanted to be. We are moving as quick as possible, so an extension would be helpful.
- Michael Flood: Kajeet's focus on off-campus access and digital equity for over a decade is closely aligned with the ECF program. Kajeet serves 2,500 schools, districts, libraries,

colleges, and non-profits connecting students, staff and patrons off-campus; and about 250 are not yet able to deploy or are still awaiting approval. Kajeet does not typically sell devices alone, rather the devices come with broadband services included, so it does not work if the FCC tried to separate devices from service. Kajeet has also received several requests from customers who did not participate in round 1 or 2 and who would apply in a third prospective application window. Some schools who applied in round 1 or 2 have discovered new unmet need and would like a third application opportunity.

- Regarding this potential extension of the June 30 Service Delivery Deadline, time is of the essence. Applicants who were only recently approved or who are still not yet approved may cancel their participation in the program because "4-5 months is just not worth the effort". They need to know ASAP that this service delivery deadline is extended before they abandon their ECF-supported projects entirely.
- Furthermore, we need a communication about the extension PRIOR to the announcement of another prospective application window. Applicants will need to know if they need to apply again for funding for services from July 1, 2022 forward, or if their current funding will carry them further. For example, an applicant who distributed devices in November may have used 7 of 12 months of funded services by 6/30/22. Should they apply for services from 7/1/22 - 6/30/23 or only from 12/1/22 - 6/30/23 as their current funding could carry them another 5 months with an extension?
- Another example is the Washington, DC public library, which received approval recently to provide 10,000 LTE-enabled Chromebooks with the device and services combined, but the logistics of distributing 10,000 Chromebooks and managing the record-keeping paperwork and end user training makes it difficult to distribute all the devices in a short time, leaving very little actual broadband service post-distribution. Having more time to distribute and provide the broadband service would be ideal.

Sincerely,



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