

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

In the matter of:

Comments of the Draft Eligible Services List  
Schools and Libraries Universal Service  
Support Mechanism

September 16, 2022

WC Docket No. 13-184  
DA 22-878

**COMMENTS OF E-RATE PROVIDER SERVICES, LLC.**

E-Rate Provider Services, LLC.  
76 Summertime Place  
Hardeeville, SC 29927  
(860) 404-8883  
[www.erateproviderservices.com](http://www.erateproviderservices.com)

Dated: September 16, 2022

## INTRODUCTION

E-Rate Provider Services respectfully submits these brief comments in response to the Federal Communications Commission's ("Commission" or "FCC") Public Notice regarding the Wireline Competition Bureau's Request for Comment on the FY 2023 Eligible Services List (ESL) for the Schools and Libraries Universal Service Mechanism, commonly known as the E-Rate Program. E-Rate Provider Services is a consulting firm serving Service Providers in the E-rate program. E-Rate Provider Services' purpose is to assist E-rate Service Providers in navigating the complexities of the program, providing sales and compliance assistance, cost allocation services, bid and proposal review, and staff training.

## A SYSTEM IN CRISIS

According to an article in the New York Times, titled, "The Pandemic Erased Two Decades of Progress in Math and Reading," (Sarah Mervosh, September 1, 2022) the United States has seen a significant drop in math and reading test scores, roughly back to the levels present at the inception of the E-Rate Program. This drop has affected all students to some degree, but is measurably worse for lower income students.

*"This year, for the first time since the National Assessment of Educational Progress tests began tracking student achievement in the 1970s, 9-year-olds lost ground in math, and scores in reading fell by the largest margin in more than 30 years. The declines spanned almost all races and income levels and were markedly worse for the lowest-performing students. While top performers in the 90th percentile showed a modest drop — three points in math — students in the bottom 10th percentile dropped by 12 points in math, four times the impact." (Mervosh)*

In short, all of the gains realized during the years of the E-Rate Program have been wiped away, and it is no great leap to suspect that we have not reached the bottom of the decline. Further, it is unclear whether the students who are now falling behind their peers can ever recover.

## SCHOOL BUS WIFI

*"On May 11, 2022, Chairwoman Rosenworcel circulated that a Declaratory Ruling, if adopted, would allow for providing Wi-Fi on school buses, finding that it serves an educational purpose and that the provision of such service is eligible for E-Rate support." (Draft ESL, Footnote 2)*

E-Rate Provider Services wholeheartedly agrees with this Declaratory Ruling, and urges the FCC to adopt it in time for the FY 2023 filing year, noting the widespread support among the larger E-Rate community for its inclusion.

Due to the funding cadence of Windows 1 and 2 of the Emergency Connectivity Fund (ECF), absent the inclusion of School Bus WiFi into the FY 2023 ESL, the districts that have purchased routers for their buses will no longer have discounted connectivity to their buses as of June 30, 2023, forcing them to either pay the undiscounted cost, or discontinue their use. That would be a significant step in the wrong direction.

Further, as the ECF funds expire, thousands of schoolchildren will find their home internet connections unsupported. Unable to pay for them, many of these districts and households will be forced to cancel service altogether, relying instead on the internet provided by these mobile access points. The expiration of both home internet access funding *and* school bus wifi funding simultaneously would place a burden on our poorest districts that they simply could not carry.

Finally, we are simultaneously mindful of SECA's excellent points, raised in their Ex Parte to the Commission dated August 4, 2022. E-Rate Provider Services agrees with each one, except for their suggestion that delaying the implementation until FY 2024 might be prudent. We must act now, to prevent our students from falling farther behind.

## SUMMARY

E-Rate Provider Services, as always, appreciates the opportunity to provide comments.

There were approximately 49,500,000 PK-12 students in the United States (nces.ed.gov) in 2021, all of whom have been affected by the pandemic, with the most significant effects affecting our poorest students. The three hurricanes which prompted emergency orders (Maria, Sandy and Katrina) had significant effects upon the affected areas, but those effects were localized, and for the most part, temporary. In contrast, the pandemic has affected every student across the country, and has already caused permanent, systemic changes to the structure of our schools. Our response should be equally urgent.

The E-Rate Program exists in a place proximate to education, but does not directly touch the students. We provide funding for tools for the schools to better teach their students and manage the business of education, and it can become subsumed in the daily work just how vital this program is to the educational outcomes of our children. Further, we all want the best program possible: clear rules, no waste, fraud, or abuse, efficient processes, and good educational outcomes.

However, in this case, the educational world is on fire. While it would be tempting to delay the inclusion of the school bus WiFi rules until the rules are perfect, E-Rate Provider Services strongly believes that this would be a mistake. In this case, the overriding concern **must** be mitigating any further harm to our children's education.

Many of the effects of the pandemic are far beyond our purview. This is not.  
The rules may not be fully baked; Release them anyway.  
The rules will be fine. The program will be fine.

Our children may not be.

Respectfully submitted,



Bob Richter  
President, E-rate Provider Services