Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

March 23, 2016

Re: Lifeline Rulemaking, WC Docket Nos. 11-42, 09-197, 10-90

Dear Chairman Wheeler and Fellow Commissioners:

The Education and Libraries Networks Coalition (EdLiNC), a group comprised of many of the major k-12 public and private education associations and the American Library Association, writes in support of the Federal Communications Commission's efforts to modernize the Lifeline program and to help bridge this nation's homework gap. As we have stated in previously filed comments, EdLiNC supports the proposal to include broadband as an eligible and supported Lifeline service because we believe it an important step in assisting students to gain access from their own homes to online homework and other digital resources necessary for their education.

However, we believe that the Commission can and must do more in its current Lifeline reform proceeding to increase students' online access from their residences. Specifically, we urge the Commission to consider including the following limited but important changes in its final order on this matter:

1) **Require that all Lifeline providers issue smart phones that are Wi-Fi enabled**. Mandating that Lifeline smart phones come equipped with Wi-Fi chips will not completely solve the homework gap problem but it will allow students to gain access to check school websites for information on school activities and teacher assignments, communicate by e-mail or text with their teachers and principals, and collaborate with their peers to some degree on group projects. Wi-Fi enabled smart phones represent a small, rudimentary bridge between technologically isolated students and the digital world that most schools and students inhabit today.

2) **Require that all Lifeline providers issue, at no additional cost, smart phones capable of tethering**. While Wi-Fi enabled phones provide a narrow crossing point for the homework gap, phones that can become hotspots and tether to larger devices, such as tablets, laptops and desktop computers, can help build a much wider bridge. On larger computing devices, students can conduct far more extensive online research; more readily gain access to websites and digitally optimized educational content; and fill-out employment and college applications and forms. Although some of these actions are possible on hand-held devices, they are much easier and less complicated on web-enabled devices with larger screens. Tethering will also provide students the opportunity to do their homework at home, freeing them from their dependency on free Wi-Fi at fast food

restaurants and coffee shops. A 2015 survey of district technology leaders suggests that student homework-related needs are only going to grow with the transition to digital materials. 84% of respondents to the survey expect their school district's instructional materials to be at least 50% digital within the next three years.[1]

Requiring tethering will also assist adult Lifeline beneficiaries, allowing them to take adult education courses online, develop resumes, research and apply for jobs, and file taxes, among other critical life tasks. It also provides parents and other family members or caregivers with opportunities to connect with their children's schools, which increase their chances of educational success.

In addition to requiring tethering, we urge the Commission to require that Lifeline providers offer Lifeline beneficiaries clear instructional materials, in print and digital form, that show beneficiaries how to operate tethering. As we are mindful that tethering can be costly to users in terms of data usage, these materials should inform Lifeline beneficiaries of the impact that tethering will have on their data usage. Further, these materials must be tailored to local community needs and demographics. Ensuring that they are multi-lingual, accessible and easy to understand is critical.

Finally, EdLiNC understands that Lifeline providers may not be in a position to offer tethering capability on all Lifeline devices immediately. Therefore, we recommend a no more than two-year phase-in period for this requirement to take effect. Any significant delay beyond this timeframe will only serve to unnecessarily delay meaningful Internet access for millions of students and adults.

3) **Require providers to work with schools and libraries to conduct outreach to those eligible for Lifeline.** EdLiNC believes that schools and libraries, institutions that serve low-income students and adults every day, are well-positioned to help spread the word of Lifeline's availability and increase the program's too low adoption rates. In order for schools and libraries to fulfill this outreach function, we believe that Lifeline providers ought to be required to provide them with print and digital materials that advertise the availability of Lifeline support and provide specific information, including telephone and digital contact information, on how applicants can sign-up to receive that support. Additionally, while we are loathe to further burden the Universal Service Administrative Company (USAC) and hamstring their efforts to efficiently process E-Rate applications, we believe that USAC can play some role, perhaps through their E-Rate applicant and service provider trainings, in alerting schools and libraries to the availability of Lifeline support for their students and patrons.

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[1] CoSN 2015 K-12 IT Leadership Survey (2015), p.17.

We appreciate the opportunity to offer our thoughts on improving the upcoming Lifeline modernization order and stand ready to answer any questions on our recommendations.

Sincerely,

AASA, The School Superintendents Association

American Federation of Teachers

American Library Association

Association of Educational Service Agencies

Association of School Business Officials International

Consortium for School Networking

International Society for Technology in Education

National Association of Elementary School Principals

National Association of Independent Schools

National Association of Secondary School Principals

National Catholic Educational Association

National Education Association

National PTA

National Rural Education Association

National Rural Education Advocacy Coalition

National School Boards Association

State Educational Technology Directors Association

United States Conference of Catholic Bishops