



**KANSAS ASSOCIATION
OF SCHOOL BOARDS**
Serving Educational Leaders, Inspiring Student Success

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The Kansas Association of School Boards (KASB) submits these comments to the Federal Communications Commission in opposition to the Notice of Proposed Rulemaking on Universal Service Contribution Methodology (WC Docket No. 06-122).

KASB strongly opposes the Commission's universal service cap NPRM and we urge the FCC to suspend consideration of the harmful proposals within it. The Commission should be doing more, not less, to help students connect to broadband.

KASB's legislative policies, affirmed by locally-elected school board members in 285 Kansas school districts, support access to affordable broadband service for all Kansas students, families and schools along with continuation and modernization of the E-rate program to ensure equitable access to telecommunications, broadband and high-speed learning options for schools, students and their families.

Since 1998, the E-rate program has been an invaluable resource and enjoys bipartisan support, even in our currently polarized political environment. Designed to address need in underserved communities and rural America in an equitable way, the program has been successful in connecting nearly 100 percent of schools and libraries to the internet in every Congressional district in this country. Today the E-rate ensures those same schools and libraries stay connected with highspeed broadband to support 21st century teaching and learning and provide unfettered access to information and services.

Rural areas, however, continue to lag other areas in connectivity and there are still enormous broadband gaps when students are out of school. The Institute of Education Sciences (IES) released a report in 2018 noting major gaps in connectivity and internet access for many students when they were out of school and/or not at a library. The gaps varied depending on their racial and ethnic background, economic status, and where they lived. Instead of proposing new rules that could limit broadband access in schools and in libraries, the FCC should be exploring ways to strengthen E-Rate and expand other opportunities for students to connect to high-speed broadband out of school to help close the digital divide in education which is commonly called the Homework Gap. See *"New Report on Student Internet Access at Home Shows Persistent Digital Divide"* Chip Slaven, Alliance for Excellent Education
<https://all4ed.org/new-report-on-student-internet-access-at-home-shows-persisting-digital-divide/>

Many Kansas communities, struggling against a weak farm economy, geographical isolation, population loss and cuts to social and medical services, find that their public schools have become default providers not only of rural community broadband access but also rural health care. Students increasingly come to school with untreated medical conditions; in some cases,

Kansas school districts have established school-based health clinics to ensure their students receive the basic health care they require to succeed academically.

KASB believes the Commission's proposal to cap the Universal Service Fund (USF) and impose sub-caps on E-Rate and Rural Health Care (RHC) funds will eventually, if not immediately, lead to those programs competing for funds when demand exceeds those caps. Reducing support for programs that are designed to provide broadband communications and information in rural schools, hospitals and homes would penalize hundreds of communities and thousands of students across Kansas and further widen the digital divide between rural and urban areas.

Furthermore, Congress' goal in establishing the four USF funds was to provide four distinct programs, each with distinct funding. In fact, if each program stays within its individual cap there is no basis for an overall USF cap. The Commission's proposal is counter to Congressional intent and only complicates the programs.