

May 14, 2020

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW Washington, DC 20054

Dear Chairman Pai,

Unprecedented times have unfolded through the COVID-19 national emergency, with our most vulnerable communities exposed to its harmful impact. As PreK-12 public education systems have shifted to virtual learning in order to support students through the pandemic, inequities in internet access have become substantially amplified.

In our Dallas County community alone (9th largest in the U.S.), **25% of households with children currently lack high-speed broadband internet**, with much of this shortfall concentrated in **just 10 high-poverty zip codes out of 92 zip codes in our region**. Expanding the analysis to the state of Texas, which educates 10% of the nation, reflects a similar crisis. Per U.S. Census data, **1.3 million (~17%) of the 7.3 million households with children in our state do not have a broadband subscription, with 800,000 of these households located in just 10 of Texas's 254 separate counties**. The most significant numbers of households lacking broadband access in Texas can be found in our large metro urban counties, but it is noteworthy that the largest percentage of households without broadband are concentrated in the Rio Grande Valley and select rural counties.

Our state's primary challenges are low subscription rates (due to cost and insufficient household credit to purchase the service) coupled with the lack of broadband infrastructure in our more rural counties. Prior to COVID 19, a Pew research report cited nearly 60% of eighth graders in the United States used the internet to do homework every or nearly every day. Barriers to internet access existed even under "normal" conditions, but in this post-COVID world, the FCC has a unique opportunity to make a vast impact ensuring public education can continue and improve by pursuing equity and excellence during these trying times.

We urge the FCC to consider these recommendations regarding current E-Rate rules:

1. **Permanently allow schools and libraries to extend their networks – wireless or wireline – beyond campus boundaries.** There is precedence for this with the FCC's "[Learning-On-The-Go](#)" pilot from 2011.
2. **Permanently allow the use of school networks for families, not just students, at or below the poverty line so that parents can support learning for their students and themselves.** This would be an extension and expansion of public notice [DA-20-234](#).
3. **Allow E-Rate dollars to be used to deliver internet access to the residence of students in underserved neighborhoods.** E-Rate funding allows school districts and libraries to build private networks (i.e.: fiber) to a campus, but those networks are limited in how, who and when that capacity can be used. For example, implementing a point-to-multipoint wireless network can leverage both district property and existing digital infrastructure to create neighborhood hotspots for students and parents to use 24x7. This E-Rate allowance will also provide a cost-effective means of allowing school districts to partner with other entities (e.g. city government, service providers, etc.) to implement a comprehensive solution to delivering internet services to residents. E-Rate rules need to allow for multiple uses of existing infrastructure. Eligible service lists need to be expanded to include the necessary district and customer premise equipment.
4. **Allow E-Rate funds to be used for cellular data plan subscriptions or comparable wireline technology subscriptions for students.** This will allow students to participate in distance learning programs during the COVID-19 pandemic and any similar future events. This also provides for student success in homework, research, and applications for higher education and employment.

The FCC is positioned to meet this urgent need through the long-established E-rate program to help alleviate the needs of our most vulnerable communities. The decisions made now will not only mitigate current disruption but

will also have a profound effect on the future of all K-12 public and private education systems to ensure equity as a top priority. Thank you for considering these recommendations.

Respectfully,



Dr. Michael Hinojosa
Superintendent, Dallas ISD
Educating ~155,000 students
(~30% lacking broadband access)



Michael Morath
Texas Education Commissioner

Co-Chairs – Texas Operation Connectivity

cc: Honorable Greg Abbott, Texas Governor
Honorable Dan Patrick, Texas Lt. Governor
Honorable Dennis Bonnen, Texas Speaker of the House

EDUCATIONAL ASSOCIATIONS

TEXAS URBAN COUNCIL
TEXAS SCHOOL ALLIANCE
TEXAS ASSOCIATION OF SCHOOL ADMINISTRATORS
AMERICAN ASSOCIATION OF SCHOOL ADMINISTRATORS
COUNCIL OF THE GREAT CITY SCHOOLS

SUPERINTENDENT SIGNATORIES

64 Texas school systems, 2.3 million students served in total

Dr. Grenita Lathan
Superintendent, Houston ISD
~209,000 students, (~30% lacking access)

Dr. LoTonya Goffney
Superintendent, Aldine ISD
~67,000 students, (~39% lacking access)

Dr. Mark Henry
Superintendent, Cypress Fairbanks ISD
~116,000 students, (~15% lacking access)

Dr. Sean Maika
Superintendent, North East ISD
~65,000 students, (~10% lacking access)

Dr. Brian Woods
Superintendent, Northside ISD
~106,000 students, (~12% lacking access)

Dr. Marcelo Cavazos
Superintendent, Arlington ISD
~60,000 students, (~20% lacking access)

Dr. Kent Scribner
Superintendent, Fort Worth ISD
~87,000 students, (~16% lacking access)

Dr. Juan Cabrera
Superintendent, El Paso ISD
~57,000 students, (~20% lacking access)

Dr. Paul Cruz
Superintendent, Austin ISD
~80,000 students, (~20% lacking access)

Dr. Ricardo Lopez
Superintendent, Garland ISD
~56,000 students, (~18% lacking access)

Dr. Charles Dupre
Superintendent, Fort Bend ISD
~76,000 students, (~10% lacking access)

Dr. Jenny McGown
Superintendent, Klein ISD
~53,000 students, (~20% lacking access)

Dr. DeeAnn Powell
Superintendent, Pasadena ISD
~53,000 students, (~12% lacking access)

Dr. Sara Bonser
Superintendent, Plano ISD
~53,000 students, (~1% lacking access)

Dr. Steve Flores
Superintendent, Round Rock ISD
~50,000 students, (~20% lacking access)

Dr. Pedro Martinez
Superintendent, San Antonio ISD
~49,000 students, (~55% lacking access)

Dr. Jose Espinoza
Superintendent, Socorro ISD
~47,000 students, (~10% lacking access)

Dr. H.D. Chambers
Superintendent, Alief ISD
~45,000 students, (~34% lacking access)

Dr. Rene Gutierrez
Superintendent, Brownsville ISD
~44,000 students, (~51% lacking access)

Dr. Elizabeth Fagen
Superintendent, Humble ISD
~43,000 students, (~5% lacking access)

Dr. Greg Smith
Superintendent, Clear Creek ISD
~42,000 students, (~4% lacking access)

Dr. David Vroonland
Superintendent, Mesquite ISD
~40,000 students, (~20% lacking access)

Dr. Bruce Gearing
Superintendent, Leander ISD
~40,000 students, (~1% lacking access)

Dr. Jeannie Stone
Superintendent, Richardson ISD
~39,000 students, (~10% lacking access)

Dr. Roland Hernandez
Superintendent, Corpus Christi ISD
~37,000 students, (~24% lacking access)

Dr. Rodney E. Watson
Superintendent, Spring ISD
~35,000 students, (~10% lacking access)

Dr. Jennifer Blaine
Superintendent, Spring Branch ISD
~35,000 students, (~10% lacking access)

Magda Hernandez
Superintendent, Irving ISD
~33,000 students, (~12% lacking access)

Dr. Thomas Randle
Superintendent, Lamar CISD
~33,000 students, (~15% lacking access)

Dr. Scott Muri
Superintendent, Ector County ISD
~33,000 students, (~20% lacking access)

Linda Ellis
Superintendent, Grand Prairie ISD
~29,000 students, (~25% lacking access)

Dr. Kathy Rollo
Superintendent, Lubbock ISD
~28,000 students, (~15% lacking access)

Carol Nelson
Superintendent, Alvin ISD
~26,000 students, (~28% lacking access)

Dr. John Chapman
Superintendent, Carrollton-Farmers Branch ISD
~26,000 students, (~20% lacking access)

Dr. Douglas Killian
Superintendent, Pflugerville ISD
~25,000 students, (~30% lacking access)

Dr. Eric Wright
Superintendent, Hays CISD
~20,000 students, (~5% lacking access)

Dr. Martha Salazar-Zamora
Superintendent, Tomball ISD
~17,000 students, (~30% lacking access)

Victor White
Superintendent, Deer Park ISD
~13,000 students, (~15% lacking access)

Carla Voelkel
Superintendent, Dickinson ISD
~11,000 students, (~40% lacking access)

Dr. Annette Tielle
Superintendent, Del Valle ISD
~11,000 students, (~30% lacking access)

Rolando Toscano
Superintendent, East Central ISD
~10,000 students, (~29% lacking access)

Greg Ollis
Superintendent, Channelview ISD
~10,000 students, (~38% lacking access)

Dr. Royce Avery
Superintendent, Manor ISD
~9,000 students, (~40% lacking access)

D'Andre Weave
Superintendent, DeSoto ISD
~9,000 students, (~13% lacking access)

Dr. King Davis
Superintendent, Sheldon ISD
~9,000 students, (~45% lacking access)

Dr. Rodney Cavness
Superintendent, Texas City ISD
~9,000 students, (~20% lacking access)

Michael Cardona
Superintendent, San Marcos CISD
~8,000 students, (~15% lacking access)

Lloyd Graham
Superintendent, La Porte ISD
~7,000 students, (~5% lacking access)

Dr. Elija Granger
Superintendent, Lancaster ISD
~7,000 students, (~30% lacking access)

Dr. Kelli Moulton
Superintendent, Galveston ISD
~7,000 students, (~25% lacking access)

Chris Trotter
Superintendent, Cleveland ISD
~7,000 students, (~26% lacking access)

Mark Estrada
Superintendent, Lockhart ISD
~6,000 students, (~40% lacking access)

Thad Roher
Superintendent, Friendswood ISD
~6,000 students, (~1% lacking access)

Dr. Jessica Johnson
Superintendent, Dayton ISD
~5,000 students, (~50% lacking access)

Dr. Jodi Duron
Superintendent, Elgin ISD
~4,000 students, (~25% lacking access)

Dr. Benny Soileau
Superintendent, Huffman ISD
~4,000 students, (~14% lacking access)

Dr. Leticia Guzman
Superintendent, Royal ISD
~2,000 students, (~40% lacking access)

Dr. Cody Abshier
Superintendent, Liberty ISD
~2,000 students, (~50% lacking access)

Dr. Marc Keith
Superintendent, Tarkington ISD
~2,000 students, (~70% lacking access)

Dr. Angela Gutsch
Superintendent, Hempstead ISD
~2,000 students, (~25% lacking access)

Nancy Sandlin
Superintendent, Danbury ISD
~1,000 students, (~15% lacking access)

Elizabeth Harris
Superintendent, Devers ISD
~200 students, (~39% lacking access)

Dr. Xavier De La Torre
Superintendent, Ysleta ISD
~40,000 students (~15% lacking access)

David Hayward
Superintendent, Damon ISD
~100 students, (~50% lacking access)