AASA
THE SCHOOL SUPERINTENDENTS ASSOCIATION

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: Promoting Fair and Open Competitive Bidding in the E-Rate Program (WC Docket No. 21-455); Schools and Libraries Universal Service Support Mechanism (CC Docket No. 02-6)

April 23, 2026

Dear Madam Secretary:

On behalf of AASA, The School Superintendents Association, representing more than 10,000 school superintendents across the nation, I write to express concern with the Commission's proposal to require the use of an additional, USAC-managed portal as part of the E-Rate application and competitive bidding process. School districts strongly support the E-Rate program and share the Commission's commitment to ensuring integrity, transparency, and appropriate use of funds. However, this proposal risks adding complexity and burden without addressing a demonstrated problem in the current system.

Redundancy and conflict with existing procurement requirements: Public school districts already operate under extensive state and local procurement laws designed to ensure open competition, fiscal accountability, and public transparency. E-Rate requirements are layered on top of these obligations, not in place of them. Introducing an additional federal portal would create duplicative processes and documentation requirements while leaving state and local rules fully intact. Rather than streamlining procurement, the proposal would require districts to manage parallel systems that increase administrative workload without improving outcomes.

A solution in search of a problem: The Commission's rationale for this proposal is difficult to reconcile with recent findings from the Government Accountability Office. In its review of federal award programs, GAO identified the E-Rate program as the only program evaluated that had documented procedures covering all leading practices for preventing fraud, waste, and abuse (GAO-26-107444). This finding affirms what school districts experience in practice: E-Rate already has strong safeguards, audits, and compliance mechanisms in place. Before imposing a significant new compliance structure, the Commission should identify a clear, evidence-based deficiency in the current process, particularly where GAO has concluded that E-Rate is already performing well.

Concerns based on past USAC system implementation experience: School districts also remember the rollout of the E-Rate Productivity Center (EPC). That transition was marked by delays, usability challenges, and cost overruns that complicated participation for districts and providers alike. While systems evolve over time, that experience underscores the risk of mandating a new, large-scale portal without clear need, realistic cost and timeline estimates, and extensive testing with end users. Districts are concerned about repeating that disruption, with costs ultimately borne by the Universal Service Fund.

As part of the preparation for this response, we reached out the AASA Executive Committee and Governing Board, a sampling of more than 150 school superintendents from school districts across the nation, and asked them to share their perspective on the likely impact of an additional, federally managed E-Rate portal. While districts vary in size, staffing, and internal capacity, their feedback reflects several consistent and recurring concerns, summarized below:

- Compliance costs would rise, driven by staff time and consultants**.** Districts reported that the primary cost of a new portal would be additional staff time required to learn, manage, and document compliance within yet another system layered on top of existing state, local, and federal requirements. Many districts estimated dozens of additional hours annually, often falling on already overextended technology, finance, and procurement staff. Just as consistently, districts expect consultant costs to increase—either through higher fees for existing consultants or the need to retain external support for the first time.
- The proposal raises the "cost of entry" to E-Rate participation**.** Most districts rely on E-Rate to support essential, non-optional services such as internet access, network infrastructure, and cybersecurity. While many indicated they could not afford to leave the program entirely, respondents were clear that rising administrative burden is already shaping participation decisions. Districts reported they would likely limit participation to only the largest or most critical projects, forgo Category 2 or lower-value filings, or opt out in certain years when staffing capacity or timing makes participation impractical. Smaller and rural districts warned that additional requirements could effectively push them out of the program altogether.
- Consultant reliance would increase**.** A majority of districts already use E-Rate consultants due to program complexity and expect consultant costs to rise under the proposal. More notably, several districts that currently manage E-Rate internally—including districts that have done so successfully for decades—stated that an additional portal would likely force them to hire consultants for the first time. Districts stressed that this diverts dollars away from connectivity and into compliance management.
- Operational strain, delays, and risk would grow**.** Districts expressed concern that a new portal would slow procurement timelines, complicate project implementation—particularly during short summer windows—and increase the risk of unintentional non-compliance. Centralizing all communications and documentation in a rigid federal system was widely viewed as increasing the likelihood of missed deadlines, documentation errors, or procedural missteps that could result in funding denials or clawbacks.
- Vendor participation and competition would decline**.** Districts also warned of reduced participation by small and local vendors, many of whom already struggle with E-Rate administrative requirements. Respondents cautioned that additional portal demands would further discourage vendor participation, reducing competition, increasing prices, and forcing districts to rely on less familiar or more distant providers—often at the expense of quality and service.
- A one-size-fits-all approach fails to reflect district realities**.** Finally, districts emphasized that the proposed portal does not account for differences in district size, staffing, procurement structures, or state law. Small and rural districts, in particular, described limited administrative capacity and warned that additional compliance layers risk undermining access, equity, and the overall effectiveness of the E-Rate program.

Taken together, this direct-from-district feedback highlights deep concerns that the proposed portal would not simplify E-Rate administration or strengthen participation. Instead, it would increase costs, reduce flexibility, discourage vendor engagement, and divert limited district capacity away from students and instruction—outcomes that should give the Commission serious pause.

We reiterate the position we shared in the detailed comments filed in coordination with SHLB, EdLiNC, CoSN and others: We urge the Commission not to move forward with the proposed competitive bidding portal requirement. If the proposal does move forward, implementation should be delayed until at least Funding Year 2029 and preceded by a focused public comment process, meaningful beta testing with a diverse group of applicants—including small and understaffed schools—and clear, comprehensive training.

Thank you for the opportunity to file these comments.

Noelle Ellerson Ng

Noelle Ellerson Ng
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AASA, The School Superintendents Association

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