

July 10, 2026

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: Ex Parte Filing: Ensuring Children's Safe Use of Screens and E-Rate-Funded Services; Promoting Fair and Open Competitive Bidding in the E-Rate Program; Modernizing the E-Rate Program for Schools and Libraries; Establishing the Emergency Connectivity Fund to Close the Homework Gap; Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking

WC Docket Nos. 26-133, 13-184, 21-93, 21-455

Dear Madam Secretary:

Pursuant to Federal Communications Commission's (Commission) ex parte rules, I submit the following summary of three meetings discussing the Commission's Notice of Proposed Rulemaking (NPRM) that seeks comment about, among other things, terminating or narrowing the scope of the E-Rate program, and *Further Notice of Proposed Rulemaking* proposing actions around program oversight and administration.

AASA, The School Superintendents Association (d/b/a AASA) is the national professional organization representing public school superintendents. AASA's elected member officers met with all three offices at the FCC on Wednesday July 8. Superintendents included:

- Dr. LaTonya M. Goffney, Aldine Independent School District (TX)
AASA President
- Dr. David Law, Minnetonka Schools (MN)
AASA Immediate Past President
- Dr. Jennifer Kelsall, Ridgewood High School District (IL)
AASA President Elect

Also present:

- Noelle Ellerson Ng, Chief Advocacy & Governance Officer
AASA, The School Superintendents Association
- Joseph Wender, Executive Director
Schools, Health & Libraries Broadband Coalition (SHLB)

Attendees met with:

- Chairman Carr, Courtney Cowper and Danielle Thumann at 11 am on July 8.
- Krista Senell, Chief of Staff for Commissioner Trusty, at 11:30 am on July 8.
- Commissioner Gomez, Deena Shetler, and Edyael Casaperalta at 12 pm on July 8.

During the meetings, the E-Rate advocates made the following points:

1. We share a focus on priorities including student safety, responsible technology use, and accountability for use of taxpayer dollars.
2. We are concerned the NPRM asks questions that could limit or even end E-Rate, a program that has become essential infrastructure for K-12 education.
3. Superintendent Law spoke to E-Rate as basic infrastructure. Internet is not an 'extra' or a 'nice to have'; it is a necessity for education and operating a school building. Internet connectivity that E-Rate supports underpins nearly every aspect of school district operations, from security systems, communications with families, and transportation to HVAC, student information systems and classroom learning. Without reliable, affordable broadband, students cannot fully participate, and schools cannot function effectively.
4. Superintendent Goffney spoke to the reality of the fiscal impact on schools. E-Rate is the fifth largest stream of federal funding in the nation's schools. Very few schools have the fiscal reserves to outright cover an E-Rate shortfall that would occur if a school district lost its E-Rate funding, and the neediest schools and communities would be hurt most should the E-Rate discount go away. She highlighted that eliminating E-Rate would shift local dollars away from teachers and student services to fill that gap, because schools require internet access. The costs don't disappear just because E-Rate does. Put another way: she emphasized that school buildings must have high speed internet. As a result, If E-Rate goes away, school districts will need to pay for internet access using other funds, which could cause staff reductions or cuts to other areas.
5. Superintendent Kelsall talked about the importance of ensuring universal access, and that when it comes to need for E-Rate, need is need: a 90% discount is a 90% discount whether rural or urban (which is generally based on the relative poverty level of the student body). She also highlighted that in her suburban Chicago district, there are pockets of internet deserts, where there is limited access available. She reiterated deep concern with any effort to limit E-Rate access based on locale or zip code.
6. Collectively the superintendents and E-Rate advocates highlighted that while screen time, instructional practices, and digital literacy are important topics, they are educational conversations that are better reserved for state and local education professionals. Should there be a federal conversation about the content on devices, the FCC—as the agency with expertise in connectivity—is not where those conversations should happen.
7. When asked about questions related to the role of consultants in E-Rate, the advocates explained their support for streamlined program administration. The advocates also cautioned how the recently adopted competitive bidding portal requirements could make the program more cumbersome and burdensome to applicants and providers.
8. When asked what they would fix in E-Rate if they could make positive changes, the E-Rate advocates emphasized a push for streamlining program administration and also expressed an interest in the creation of additional funding to support cybersecurity equipment and services within E-Rate, with either an expanded Category Two or creation of a new, third category.

Sincerely,

A handwritten signature in black ink that reads "Noelle Ellerson Ng". The signature is fluid and cursive, with the first name "Noelle" being the most prominent.

Noelle Ellerson Ng
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cc via email: Danielle Thumann
Courtney Cowper
Marcus Maher
Krista Senell
Harsha Mudaliar
Deena Shetler
Edyael Casaperalta