

October 10, 2026

Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: WC Docket Nos. 26-133, 13-184, 21-93, and 21-455 — Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking Concerning E-Rate

Dear Chairman Carr:

On behalf of AASA, The School Superintendents Association, I submit this comment in response to the Federal Communications Commission's (FCC) review of the E-Rate program, and we write to urge the FCC to preserve and strengthen the E-Rate program and to reject any proposal that would eliminate, sunset, substantially reduce, or unnecessarily restrict E-Rate support for schools and libraries.

AASA represents public school system leaders across the country. Our members are responsible for ensuring that schools have the infrastructure, systems, and resources necessary to serve students every day. From that perspective, E-Rate is not an abstract federal program: it is the fifth largest stream of federal support in the nation's public schools and it is an essential part of the infrastructure that allows modern public schools to operate.

AASA supports periodic review of E-Rate. Over nearly three decades, the FCC has continually examined whether the program is achieving its intended purpose, whether program rules remain effective and relevant, and whether federal resources are being administered responsibly. Protecting the program from waste, fraud, and abuse should remain a central responsibility of the Commission. Indeed, the FCC has taken recent steps to strengthen competitive bidding, transparency, and program integrity, demonstrating that E-Rate can be both effective and accountable.

At the same time, the scope of the questions presented in this proceeding warrants careful consideration. A review intended to assess the effectiveness and integrity of E-Rate should remain anchored in the purpose for which Congress established the program: supporting affordable advanced telecommunications and information services for eligible schools and libraries. The Commission's own recent actions describe E-Rate in these terms.

The experience of public school systems demonstrates why that focus matters.

E-Rate-supported connectivity is woven into the daily operation of a school system. The network supports far more than a student sitting in front of a computer. Connectivity



underpins instructional systems and digital curriculum, state assessments, special education services, career and technical education, and communication between educators and families. It also supports transportation operations, security and emergency communications, payroll and business systems, food service, and the many other functions that allow a school system to operate safely and effectively. AASA's national E-Rate resources document these uses across school systems.

This is also a program with a substantial and measurable record. Based on USAC data for funding years 2021–2025, approximately \$13.2 billion in E-Rate commitments supported schools and libraries nationwide, with approximately \$2.6 billion committed in a typical funding year. During that period, 98.1 percent of U.S. counties received E-Rate funding. The program now serves more than 100,000 schools and 11,000 libraries each year.

Those numbers matter, but so does what they represent: a national connectivity infrastructure that school systems have built their operations around over nearly 30 years. The economic benefits of E-Rate extend well beyond the schools and libraries receiving support. AASA supported a [recent economic impact study](#) conducted by The Brattle Group for the Schools, Health & Libraries Broadband (SHLB) Coalition, which found that every dollar in E-Rate support is associated with approximately \$1.60 in economic activity. Eliminating approximately \$2.6 billion in annual E-Rate funding would reduce U.S. real gross domestic product by an estimated \$4.2 billion annually, real wages by \$2.8 billion, and tax revenues by \$1.5 billion. These projected losses would be felt nationwide, with the South experiencing the greatest impact because it receives the largest share of E-Rate support. The findings underscore that E-Rate is not simply a cost to the federal government; it is an investment in the connectivity that schools and libraries require and in the broader economic activity those institutions support.

AASA therefore shares the basic premise reflected in the comments of the Education and Libraries Networks Coalition (EdLiNC): the Commission has both the authority and responsibility to review E-Rate, and stakeholders should engage seriously with questions concerning program effectiveness, administration, and integrity. But that review should be conducted in a manner consistent with the program's purpose. Questions concerning curriculum, instructional practice, or student behavior are fundamentally different from questions about whether E-Rate is effectively delivering affordable connectivity.

In particular, connectivity should not be conflated with how schools choose to use technology. E-Rate supports eligible telecommunications services and network infrastructure; it does not dictate curriculum, instructional practice, or how educators and local school leaders establish expectations for student technology use. Those decisions appropriately remain matters for school systems, educators, families, and state and local policymakers.

Similarly, the fact that school connectivity has improved substantially since E-Rate was established should not be interpreted to mean that the underlying need for the program has disappeared. Modern networks require ongoing service, maintenance, security, upgrades,



capacity, and replacement. The success of E-Rate has helped make reliable connectivity a foundational expectation in American schools; that success does not eliminate the continuing cost of maintaining the infrastructure on which schools now depend.

AASA believes the Commission can pursue both objectives: maintaining a strong, effective E-Rate program and ensuring rigorous stewardship of federal resources. A periodic review should identify opportunities to improve program administration, strengthen accountability, reduce unnecessary burden, and ensure that funding reaches its intended purposes. At the same time, the review should distinguish those legitimate questions from questions that would fundamentally alter the purpose or scope of a program that has demonstrated substantial value over nearly three decades.

For public school systems, the practical question is straightforward: does E-Rate continue to help schools obtain the reliable, affordable connectivity necessary to educate students and operate their schools? The experience of AASA members across rural, suburban, and urban communities demonstrates that it does.

We appreciate the Commission's consideration of these comments and the opportunity to contribute the perspective of the nation's public school system leaders to this important proceeding.

Sincerely,

A handwritten signature in black ink, reading "Noelle Ellerson Ng". The signature is written in a cursive, flowing style.

Noelle Ellerson Ng
Chief Advocacy & Governance Officer
AASA, The School Superintendents Association