October 9, 2026

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Ensuring Children's Safe Use of Screens and E-Rate-Funded Services	)	WC Docket No. 26-133
	)	
Modernizing the E-Rate Program for Schools and Libraries	)	WC Docket No. 13-184
	)	
	)	WC Docket No. 21-93
Establishing the Emergency Connectivity Fund to Close the Homework Gap	)	WC Docket No. 21-455
	)	
Promoting Fair and Open Competitive Bidding in the E-Rate Program	)	

COMMENTS OF Connected Nation, Inc.

Connected Nation, Inc. ("CN") respectfully submits these comments in response to the Federal Communications Commission's ("Commission" or "FCC") Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking in the above-referenced proceeding. CN is a national non-profit with 25 years of experience that works with states, communities, schools, libraries, and industry partners to close the Digital Divide, including through direct technical and policy support to school and library E-Rate applicants and the state broadband offices that help coordinate broadband planning on their behalf. CN currently supports community digital skills training, broadband planning and federal policy work on behalf of community, state and territorial clients, and our comments reflect that on-the-ground experience with how E-Rate funding decisions affect classrooms and communities.

CN commends the Commission for its continued attention to program integrity, and we support targeted reforms that make E-Rate more efficient, transparent, and accountable to ratepayers. At the same time, several questions raised in the Notice — including

whether the Commission should narrow, reorient, or limit the scope of E-Rate support — go to the core structure of a program that Congress established by statute and that continues to deliver measurable value to students and communities. CN's central recommendation is a "Do No Harm" approach: the Commission should pursue efficiency and integrity improvements without diminishing the statutory scope, funding availability, or effectiveness of the E-Rate program.

I. DO NO HARM: PRESERVE THE STATUTORY SCOPE AND FUNDING OF E-RATE

Section 254(h) of the Communications Act directs the Commission to ensure that schools and libraries have access to advanced telecommunications and information services at affordable, discounted rates. As the Notice recognizes, E-Rate has been instrumental in achieving near-universal broadband connectivity in schools and libraries; CN views this outcome as evidence of the program's success in fulfilling Congress's statutory objectives, not as a basis for reducing the program's scope or support.

Federal and state policymakers have invested billions of taxpayer dollars over multiple decades through E-Rate, BEAD, and other federal broadband programs to build and modernize the infrastructure that connect educational and community anchor institutions. Those investments deliver lasting public value only if schools and libraries can continue to maintain, upgrade, secure, and replace the infrastructure necessary to meet evolving connectivity needs. Narrowing E-Rate eligibility or reducing support risks undermining the long-term effectiveness of these investments and shifting costs to local communities that may lack the resources to absorb them.

Connectivity is not a one-time accomplishment. Demand for bandwidth continues to increase, network equipment must be refreshed on predictable cycles, and cybersecurity threats require ongoing attention and investment. For many schools and libraries, E-Rate remains the principal mechanism that enables these institutions to sustain reliable, secure, high-capacity networks while keeping services affordable for students, educators, patrons, and taxpayers.

CN urges the Commission to approach any proposal to narrow, sunset, or fundamentally reorient the E-Rate program with caution. Any significant changes to eligible services, funding levels, discount rates, or the program's underlying objectives should be based on a comprehensive evidentiary record demonstrating that such changes are consistent with the Commission's statutory obligations and will not jeopardize the connectivity gains the program has achieved.

II. NEED IS NOT EXCLUSIVELY A RURAL CONDITION

The Notice seeks comment on whether E-Rate support should be limited or more heavily targeted to rural communities. While CN recognizes the unique connectivity challenges

faced by many rural schools and libraries, it opposes narrowing eligibility on a rural-only basis. Financial need, affordability challenges, and connectivity demands exist in communities of every type, including urban, suburban, and rural areas.

Many schools and libraries located in metropolitan areas serve high-poverty populations and operate within constrained local budgets that are insufficient to support the ongoing costs of broadband connectivity, network modernization, cybersecurity, and equipment replacement. A geographic eligibility framework would risk excluding institutions that face significant financial barriers solely because of their location, rather than because of their actual ability to afford the services necessary to meet the educational and informational needs of their communities.

Moreover, geographic classifications are an imperfect proxy for need. While rural status may correlate with certain deployment challenges, it does not reliably measure financial capacity, affordability, or demand for advanced telecommunications and information services. The Commission's longstanding E-Rate framework appropriately recognizes this reality through discount mechanisms that account for poverty and other indicators of need.

CN therefore recommends that the Commission continue to anchor eligibility and prioritization decisions in objective, need-based criteria, including the poverty measures already incorporated into the E-Rate discount matrix, rather than adopting geographic limitations that could unintentionally disadvantage vulnerable students, library patrons, and communities. Such an approach is more consistent with the program's statutory purpose of ensuring equitable access to advanced communications services for schools and libraries nationwide.

III. IMPROVE THE PROCESS FOR IDENTIFYING SCHOOLS AND LIBRARIES WITH THE GREATEST NEED

CN supports Commission efforts to refine how applicants with the greatest need are identified and prioritized for funding, particularly during years in which demand exceeds available E-Rate funding. The existing discount matrix provides a longstanding and generally effective framework for assessing need, but the Commission should evaluate whether additional objective data sources could improve the precision and equity of funding determinations.

For example, updated poverty measures, broadband performance and bandwidth-adequacy data, indicators of local fiscal capacity, and other verifiable measures may provide a more complete picture of an applicant's ability to obtain and sustain advanced communications services. Any improvements should build upon the current framework while minimizing additional administrative burdens on applicants and avoiding unnecessary complexity in the application process.

At the same time, the Commission should ensure that any revised methodology remains transparent, predictable, and easy for schools and libraries to understand. Applicants must be able to anticipate their eligibility and funding levels with reasonable certainty in order to plan technology investments and budgets effectively.

A more precise, data-driven approach to identifying need would help ensure that limited E-Rate resources are directed to the schools and libraries facing the greatest financial and connectivity challenges, advancing the program's statutory goals while promoting responsible stewardship of federal funds.

IV. DRIVE COMPETITIVE PRICING

CN supports Commission efforts to strengthen price competition and reinforce compliance with the Lowest Corresponding Price (LCP) rule. Promoting competitive pricing is one of the most effective ways to maximize the impact of limited E-Rate resources, allowing more schools and libraries to obtain high-quality connectivity without reducing program support or narrowing eligibility.

Greater transparency into the rates charged to E-Rate applicants may help identify pricing disparities, improve market efficiency, and enable applicants to negotiate more effectively. CN has demonstrated the value of this approach firsthand. In 2020, CN, in partnership with Funds for Learning, launched and administered Connect K-12, a free, nationwide platform that transformed publicly available E-Rate data into accessible comparisons of school broadband pricing, speeds, and progress toward the Commission's connectivity goals. Connect K-12 became an important resource not only for school districts and state education leaders, but also for the Commission itself. The FCC repeatedly cited and relied upon Connect K-12 findings in its Section 706 broadband deployment reports and related Notices of Inquiry, acknowledging in 2025 that it had "historically relied" on the Connect K-12 Report published by Connected Nation to assess school and classroom broadband connectivity.

Although Connect K-12's annual reports concluded in 2023, their influence continues. In its 2026 Section 706 Report, the Commission explained that its staff closely reviewed and approximated Connect K-12's methodology to continue evaluating progress toward national school connectivity goals. This history demonstrates the value of accessible, independently analyzed E-Rate data for both policymaking and school purchasing decisions. CN therefore urges the Commission to support the revival and modernization of Connect K-12 as a free, nationwide E-Rate pricing and transparency resource, leveraging existing USAC data to enable meaningful comparisons among similarly situated applicants without imposing new reporting burdens. Restoring this capability would empower schools to secure more competitive rates, help identify pricing disparities relevant to Lowest

Corresponding Price compliance, and strengthen E-Rate program efficiency and accountability without diminishing support for eligible applicants.

Other measures CN supports to be considered are benchmark or median-price reference tools, enhanced LCP certifications, and other mechanisms that provide applicants with clearer information regarding prevailing market rates.

CN also encourages the Commission to consider the use of independent, third-party price validation tools or reviews to identify contracts and bids that appear inconsistent with prevailing market rates. Such reviews could provide applicants, USAC, and the Commission with an objective assessment of pricing reasonableness, strengthen compliance with the Lowest Corresponding Price rule, and help ensure that E-Rate funds are used as efficiently as possible. To avoid unnecessary costs and delays, any review process should be targeted to pricing outliers or other risk indicators rather than applied universally to all funding requests.

At the same time, any transparency, reporting, or review requirements should be carefully designed to avoid imposing unnecessary administrative burdens on applicants or service providers. The Commission should prioritize approaches that leverage existing E-Rate and USAC data wherever possible and that remain accessible to applicants with limited procurement expertise or administrative resources.

CN also supports the Commission's efforts to modernize the competitive bidding process through the new bidding portal. Increased visibility into bidding activity has the potential to strengthen competition, improve program integrity, and provide applicants with additional information to make informed purchasing decisions. However, implementation timelines and compliance requirements should remain manageable for applicants of all sizes, particularly small school districts and libraries with limited staff and technical capacity.

By improving transparency and competition while minimizing compliance burdens, the Commission can help ensure that E-Rate funding delivers the greatest possible value to schools, libraries, and taxpayers.

V. GET FUNDING TO SCHOOLS AND LIBRARIES MORE EFFICIENTLY

CN encourages the Commission to pursue administrative improvements that shorten the time between application, funding commitment, and disbursement; reduce duplicative documentation requirements; and provide applicants with clearer, more predictable timelines. Timely funding is critical to effective planning, procurement, and deployment of broadband services and equipment. Delays in funding decisions can disrupt purchasing cycles, postpone network upgrades, and create uncertainty for schools and libraries operating under fixed budget and academic-year constraints.

Program integrity and administrative efficiency are not competing objectives. A simpler, more transparent process can reduce the risk of errors, improve compliance, and allow the Commission, USAC, and applicants to focus resources on delivering connectivity rather than navigating unnecessary administrative complexity.

Where the Notice proposes new certification, reporting, or documentation requirements, CN encourages the Commission to carefully weigh the expected program-integrity benefits against the resulting burden on applicants. New requirements should be implemented only where they provide a clear and measurable benefit and should be phased in with adequate technical assistance, training, and lead time. The Commission should also seek opportunities to leverage existing data sources and certifications to minimize duplicative reporting obligations.

VI. PRESERVE AND STRENGTHEN CONSORTIUM PURCHASING

CN strongly supports the continued use of consortium applications, whether organized regionally, statewide, or through other cooperative arrangements, as a proven mechanism for aggregating demand, increasing purchasing power, securing more competitive pricing, and reducing administrative burdens on participating schools and libraries.

Consortium purchasing is particularly valuable for smaller, rural, and resource-constrained applicants that may lack the staff, technical expertise, or negotiating leverage needed to independently navigate complex procurements. By pooling demand, consortiums often achieve pricing and service terms that individual applicants could not obtain on their own, advancing both affordability and program efficiency.

State broadband offices, regional education agencies, and other consortium leaders play an important role in coordinating procurement activities, ensuring compliance, and providing technical support to participating entities. As the Commission evaluates procedural changes under this proceeding, including proposals that would require individual consortium members to complete additional certification or filing steps before a lead applicant may submit an application, it should carefully consider whether such requirements could discourage participation or diminish the benefits that consortium purchasing provides.

Any new safeguards should be targeted, proportionate, and designed to preserve rather than undermine the administrative efficiencies and cost savings that make consortium purchasing an effective and widely used E-Rate model. The Commission should seek to expand successful consortium participation, not create barriers that reduce its effectiveness.

VII. CONCLUSION

CN appreciates the Commission's continued efforts to ensure that E-Rate funds are used responsibly, efficiently, and consistent with the statutory objectives established by Congress. As the Commission evaluates potential reforms, it should build upon the program's demonstrated success in connecting schools and libraries rather than narrowing the support that has made that success possible.

CN urges the Commission to adopt a "Do No Harm" approach that preserves the statutory scope and funding availability of the E-Rate program while pursuing targeted improvements that enhance program performance. Specifically, the Commission should: (1) maintain broad eligibility for schools and libraries; (2) prioritize support based on demonstrated need rather than geography alone; (3) improve the accuracy of need-based funding decisions; (4) strengthen price competition and transparency; (5) streamline funding and disbursement processes; and (6) preserve and strengthen consortium purchasing arrangements.

These reforms would improve accountability, competition, and administrative efficiency without jeopardizing the connectivity gains that schools and libraries have achieved through decades of public and private investment. By focusing on targeted improvements rather than fundamental retrenchment, the Commission can strengthen program integrity while ensuring that students, educators, library patrons, and communities continue to benefit from affordable access to advanced communications services.

Respectfully submitted,

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