

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

|   |   |                      |
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| In the Matter of  | ) |                      |
|   | ) |                      |
| Schools and Libraries Universal<br>Support Mechanism        | ) | CC Docket No. 02-6   |
|   | ) |                      |
| Connect America Fund  | ) | WC Docket No. 10-90  |
|   | ) |                      |
| Modernizing the E-rate Program for<br>Schools and Libraries | ) | WC Docket No. 13-184 |
|   | ) |                      |

**COMMENTS OF THE VOICE ON THE NET COALITION**

The Voice on the Net Coalition (“VON”)<sup>1</sup> hereby submits its comments in response to the Public Notice issued in the above-captioned proceedings.<sup>2</sup> VON supports the Petitions and the use of advanced communications services to enhance educational opportunities for participating students, without imposing any additional costs on the E-rate program. In addition, students’ use of the internet in their home environments for educational purposes will demonstrate the importance, and promise, of internet connectivity, creating greater incentives for the household to purchase internet access. Accordingly, VON strongly encourages the Commission to grant the Petitions.

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<sup>1</sup> VON is the leading advocacy organization for the Internet communications industry, working with legislators, regulators, and other policymakers to develop policies that support the availability and adoption of Internet communications products and services. For more information, see [www.von.org](http://www.von.org).

<sup>2</sup> *Wireline Competition Bureau Seeks Comment on Petitions Regarding Off-Campus Use of Existing E-rate Supported Connectivity*, CC Docket 02-6, WC Docket Nos. 10-90 and 13-184, Public Notice, DA 16-1051 at 2-3 (rel. Sep. 19, 2016) (“Public Notice”).

As the Commission has recognized, broadband internet access service is critically important for educational purposes.<sup>3</sup> The absence of internet access is felt acutely by children whose academic performance often depends on – indeed assumes – access to the internet, but who lack the ability to secure internet access on their own. The press recounts anecdotal stories of children sitting in McDonald’s parking lots or other retail locations for the sole purpose of accessing Wi-Fi to complete their homework.<sup>4</sup> Other children are unable to access those retail locations at all, either because those establishments are not located nearby or because their parents and guardians cannot accompany them or transport them there. These strains on students and families occur at the same time that the students’ schools’ internet connections remain available and paid-for, but unused. The petitions would let students do their homework in the safety of their own homes, over a secured network, and in the presence of other family members. These pilots will remove the participating students’ educational disadvantage relative to their connected peers that is caused by a lack of connectivity.<sup>5</sup> They also would advance a core

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<sup>3</sup> *Modernizing the E-rate Program for Schools and Libraries*, Report and Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870, ¶ 27 (2014) (“high speed broadband is essential for students”) (“*2014 E-rate Modernization Order*”); *see id.* (“The record clearly demonstrates the power of high-speed broadband connectivity to transform learning.”); *see also Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 at ¶ 22 (2016) (observing that “broadband is an essential tool for completing homework”) (“*2016 Lifeline Order*”).

<sup>4</sup> *See, e.g.,* Anton Troianovski, “The Web-Deprived Study at McDonald’s,” *Wall St. Journal* (Jan. 28, 2013), *available at*: <<http://www.wsj.com/articles/SB10001424127887324731304578189794161056954>>; *see also* Cecilia Kangfeb, “Bridging a Digital Divide That Leaves Schoolchildren Behind,” *NY Times* (Feb. 22, 2016), *available at*: <<http://www.nytimes.com/2016/02/23/technology/fcc-internet-access-school.html>> (“In cities like Detroit, Miami and New Orleans, where as many as one-third of homes do not have broadband, children crowd libraries and fast-food restaurants to use free hot spots.”).

<sup>5</sup> *See 2016 Lifeline Order* at ¶ 14 (noting that commenters had put forth numerous studies confirming that a lack of Internet access at home puts students at a disadvantage with regard to completing their assignments and keeping up with their peers).

universal service goal<sup>6</sup> and extract more benefit from E-rate subsidized connections that have already been paid for, without adding another dollar to the size of the fund.

The pilots described in the petitions also may generate the ancillary benefit of encouraging home broadband adoption. There are a variety of potential causes for low home adoption rates, including the lack of availability and affordability.<sup>7</sup> Even when internet access is available and affordable, households may not subscribe because they do not value it sufficiently, perhaps because of a lack of exposure. For example, according to a Pew Research study, more than half of non-broadband users in the United States have never had a home broadband subscription and, when asked, 70 percent of them (or 46 percent of all non-adopters) say they are not interested in having broadband service at home in the future.<sup>8</sup> Although cost was the number one reason cited, the second largest specified reason was that respondents perceived smartphones to be capable of doing everything online that one needs to do.<sup>9</sup> By contrast, most people who are exposed to home broadband service – that is, current subscribers – would not cancel it to use wireless broadband service as a substitute.<sup>10</sup>

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<sup>6</sup> The Commission established the E-rate program goal of ensuring affordable access to high-speed broadband sufficient to support digital learning in schools. *See 2014 E-rate Modernization Order* at ¶ 26. If digital learning cannot be accomplished outside of school, it limits the extent to which it can be emphasized within the school.

<sup>7</sup> *See 2016 Lifeline Order* at ¶ 2 (“Affordability remains the primary barrier to broadband adoption”); *see also* John B. Horrigan and Maeve Duggan, Pew Research Center “Barriers to broadband adoption: Cost is now a substantial challenge for many non-users,” *Home Broadband 2015* at p. 4 (Dec. 21, 2015) (“Pew Home Broadband Study”).

<sup>8</sup> *See id.* at p. 4

<sup>9</sup> *Id.*

<sup>10</sup> *See Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, 2016 Broadband Progress Report, 31 FCC Rcd 699, ¶ 38 (2016) (“[I]n a recent survey referenced by Public Knowledge, ‘ninety-two percent of consumers said they were “very” or “somewhat” unlikely to cancel their home broadband connection in favor of a purely mobile experience.’”).

It is estimated that roughly half of the students in one of the pilots come from households lacking home broadband service.<sup>11</sup> It is not clear what motivates the low broadband adoption rates among those students' households. However, when members of these households who hold responsibility for allocating financial resources can see first-hand the benefits that a home internet connection can bring, they may begin to understand its greater value. Students' use of the internet at home, even though solely for their educational purposes, will nevertheless demonstrate to others in the household the benefits of home broadband service; potentially increasing its value all household members. Accordingly, the pilots might generate demand for home broadband adoption within their pilot.

For the foregoing reasons, the VON Coalition urges the Commission to grant the petitions.

Respectfully submitted,

**VOICE ON THE NET COALITION**

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<sup>11</sup> See Joint Petition for Clarification or, in the Alternative, Waiver of Microsoft Corporation, Mid-Atlantic Broadband Communities Corporation, Charlotte County Public Schools, Halifax County Public Schools, GCR Company, and Kinex Telecom at p. 8 (filed June 7, 2016).