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**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. 26-13)
Modernizing the E-Rate Program for Schools and Libraries	(WC Docket No. 13-184)
Establishing the Emergency Connectivity Fund to Close the Homework Gap	(WC Docket No. 21-93)
Promoting Fair and Open Competitive Bidding in the E-Rate Program	(WC Docket No. 21-455)

COMMENTS OF THE NATIONAL SCHOOL BOARDS ASSOCIATION

Local Leaders Are Best Positioned to Make Decisions About Classroom Technology and Instruction

NSBA shares the Commission's concern that technology should always be used in ways that support student learning and well-being. Questions about screen time, digital learning, and emerging technologies deserve serious consideration. But those questions also illustrate why decisions about instruction have traditionally been entrusted to states and local school districts rather than prescribed through a federal telecommunications program.

Locally elected school boards occupy a unique position in public education. They establish district priorities, allocate resources, adopt policies, oversee district performance, and provide a direct avenue for parents and community members to participate in decisions affecting their schools. At the same time, effective governance recognizes the professional responsibilities of superintendents, teachers, and other educators. As NSBA's Center for Public Education has explained, educators and district leaders retain primary responsibility for instructional expertise and implementation, while school boards set priorities, ensure transparency, ask informed questions, and align policies and resources with student learning goals. In this model, boards do not replace educators' professional judgment; they create the conditions in which sound instructional decisions can be made and sustained.¹

¹ See Ctr. for Pub. Educ., Nat'l Sch. Bds. Ass'n, Adopting High-Quality Math Instructional Materials: The Role of School Boards 6 (2025) [hereinafter NSBA Math Report].

That division of responsibility is particularly important when considering technology use. There is no single category of “screen time” in a modern school. A student might use a connected device to access an advanced course that is unavailable locally, complete an assessment that provides a teacher with immediate information about learning needs, use assistive technology required to access instruction, collaborate with classmates, or engage with material that has little educational value. The appropriate use of technology consequently depends on its purpose, the needs of particular students, the instructional setting, and the judgment of educators and local leaders.

The U.S. Department of Education recently recognized precisely this distinction. In guidance addressing education technology and screen time, the Department cautioned against treating recreational and educational technology as synonymous and stated that the relevant question is not simply whether students use technology, but whether that technology improves learning and academic outcomes. The Department further concluded that these decisions “are best made by states and local communities, with input from parents and teachers.”²

NSBA agrees with that approach. Screen exposure alone is an incomplete measure of educational value. The Department's guidance provides useful examples: the same technology that may be distracting when used recreationally can provide a rural student with access to advanced coursework, allow a student with a disability to access instruction through assistive technology, or enable a homebound student to participate in classroom learning. Federal policy should therefore encourage districts to evaluate technology based on its instructional purpose and results rather than establish uniform limits based principally on the amount of time students spend using a screen.

This does not mean that concerns about excessive or inappropriate technology use should go unanswered. Local leadership is not an absence of accountability. School boards are accountable to the communities they serve and provide an established public process through which parents, educators, and other stakeholders can raise concerns and help shape district policy. NSBA's work on instructional governance emphasizes that meaningful stakeholder engagement improves local decision-making and that teachers, families, and community members have important and complementary roles in developing and implementing district priorities.³

Indeed, the Department's guidance describes education technology as a “shared responsibility” in which states establish policy and procurement expectations, districts create the conditions for successful implementation, educators integrate technology into instruction, and families provide important partnership and feedback.⁴ That model is consistent with the way effective local school governance works: responsibilities are distributed among those best positioned to exercise them, while the school board provides public oversight and accountability.

² See Letter from Kirsten Baesler, Assistant Sec'y, Off. of Elementary & Secondary Educ., U.S. Dep't of Educ., to Colleagues 1 (Aug. 20, 2026) [hereinafter ED Screen Time Guidance] (explaining that recreational and educational technology should not be treated as synonymous and that technology use should be evaluated based on its effect on learning and academic outcomes).

³ NSBA Math Report, p.18

⁴ ED Screen Time Guidance, p.4

The Commission should respect that governance structure as it considers the proposals in this proceeding. E-Rate has an important and distinct federal purpose: helping schools and libraries obtain affordable, reliable connectivity. Decisions about how that connectivity is used to teach students necessarily involve educational judgments that vary by age, curriculum, student need, community priorities, and local circumstances. Conditioning E-Rate support on federally prescribed screen-time or instructional requirements would blur the line between supporting educational infrastructure and regulating classroom practice.

NSBA therefore encourages the Commission to preserve that distinction. The FCC should continue to ensure that E-Rate effectively supports the connectivity schools need, while leaving decisions about when and how technology is used for instruction to state and local education leaders, working with educators, parents, and their communities.

E-Rate Remains Essential to Ensuring that Every School and Library Has Affordable, High-Capacity Connectivity

E-Rate plays a central role in connecting America's schools and libraries. Connecting a school to broadband is not a one-time accomplishment. Schools must be able to afford continuing high capacity broadband, maintain reliable internal networks, and upgrade their infrastructure as technology and educational needs change.

USAC's most recent data demonstrate the continuing scale of this need. In 2025, 158,030 schools and libraries received E-Rate-supported services.⁵ USAC authorized approximately \$2.38 billion in E-Rate support that year, following approximately \$2.61 billion in 2024 and \$2.46 billion in 2023.⁶ These figures reflect a program that is meeting a substantial national demand..

That continuing need is not surprising. Reliable, high-capacity connectivity has become basic educational infrastructure. Schools depend on broadband and internal networks to support instruction, assessments, communications with families, student information systems, accessibility tools, professional development, and other essential functions. As technology evolves, the amount and quality of connectivity necessary to support these activities will evolve as well.

USAC itself continues to describe E-Rate as a program that “helps to close the digital divide by funding essential technology to connect schools, libraries, and their patrons with broadband services.”⁷ The Commission should remain focused on that core universal service mission as directed by Congress through the Telecommunications Act of 1996.⁸ The relevant question is not simply whether a school has a broadband connection today, but whether schools and libraries throughout the country can continue to obtain the affordable, reliable, and high-capacity connectivity necessary to serve their communities.

⁵ Universal Serv. Admin. Co., 2025 Annual Report 6 (2026)

⁶ ² Id. at 4

⁷ ³ Id. at 7.

⁸ Telecommunications Act of 1996, Pub. L. No. 104-104, § 101(a), 110 Stat. 56, 71–75 (codified as amended at 47 U.S.C. § 254).

E-Rate's success in expanding connectivity should not obscure the continuing responsibility to sustain it. Without E-Rate support, school districts would still need to purchase broadband services, maintain internal networks, and periodically upgrade infrastructure, but a greater share of those expenses would fall on state and local resources. Broadband service, Wi-Fi, network equipment, maintenance, and infrastructure upgrades would remain necessary expenses. Reducing federal support would instead require school districts to absorb more of those costs within state and local budgets, potentially placing additional pressure on resources available for teachers, instructional programs, student services, and other local priorities.

NSBA also recognizes the importance of ensuring that E-Rate is administered efficiently and responsibly. Here too, USAC's recent experience provides reason to build upon the program rather than retreat from it. In 2025, USAC completed a review of 95.1 percent of workable FY2025 applications by September 1, representing \$2.11 billion in obligations. It also reduced the backlog of prior-year applications by 88 percent and reduced prior-year funding remaining under review from \$489.4 million to \$56 million.⁹ Continued efforts to simplify E-Rate and improve its administration can strengthen the program while making it easier for schools and libraries to participate.

The federal and local roles in this area are complementary. The federal government has an appropriate role in ensuring that schools and libraries can obtain affordable, high-capacity connectivity. Locally elected school boards, working with superintendents, educators, families, and their communities, are best positioned to determine how that connectivity should be used to advance teaching and learning. The Commission should preserve both principles as it considers E-Rate's future.

CIPA's Local Accountability Framework Should Remain the Model for Protecting Students Online

NSBA shares the Commission's commitment to protecting children when they use school networks and supports meaningful opportunities for parents and communities to participate in decisions about student online safety. The Children's Internet Protection Act (CIPA) already provides a strong framework for accomplishing these objectives while respecting the important role of local leadership.

CIPA establishes federal requirements for schools receiving certain E-Rate support while leaving important policy decisions to local educational authorities. Among other requirements, schools must adopt an Internet safety policy, provide reasonable public notice, and hold at least one public hearing or meeting concerning that policy.¹⁰ The Commission's rules also recognize that determinations about material that is inappropriate for minors are made by the school board, local educational agency, library, or other responsible authority.¹¹ This framework combines federal protections with local decision-making and public accountability.

Locally elected school boards are particularly well positioned to carry out this responsibility. Board meetings and other local processes provide parents, educators, and community members opportunities to raise concerns, provide input, and hold local leaders accountable for policies governing students' use of

⁹ Id. at 8

¹⁰ 47 U.S.C. § 254(h), (l)

¹¹ See 47 U.S.C. § 254(h)(5), (l); 47 C.F.R. § 54.520(h); see also Universal Serv. Admin. Co., Children's Internet Protection Act (CIPA)

technology. Indeed, the Commission recognizes in the NPRM that CIPA's public participation requirements are important to ensuring that parents and guardians can weigh in on Internet safety decisions affecting their children.¹²

NSBA therefore urges the Commission to build on, rather than displace, CIPA's existing approach. The Commission seeks comment on potentially prescribing additional requirements concerning the timing and manner of public notice, additional public meetings when policies are amended, and other procedures governing local adoption of Internet safety policies. Federal policy should ensure meaningful protections and accountability, but it need not prescribe the details of how locally elected school boards engage their communities or conduct their governance responsibilities. Those processes are also governed by state and local requirements and necessarily vary among communities.

The same principle should apply more broadly as the Commission considers additional online-safety requirements. Parents, educators, school boards, and other local leaders share responsibility for ensuring that students use technology safely and appropriately. CIPA provides an appropriate model: establish meaningful federal protections while preserving local authority to implement those protections in ways responsive to students, families, and communities.

Conclusion

E-Rate has succeeded because it combines a focused federal commitment to universal connectivity with state and local leadership over education. As the Commission considers the program's future, NSBA urges it to preserve that balance: maintain strong federal support for the affordable, high-capacity broadband schools and libraries need; respect the authority of local education leaders to make instructional decisions; and build on CIPA's existing framework of local accountability, student online safety, and meaningful parent and community engagement. These principles will allow E-Rate to continue advancing its core mission while preserving the local leadership that is fundamental to public education.

Sincerely,

A handwritten signature in black ink, reading "Verjeana McCotter-Jacobs". The signature is fluid and cursive, with the first name "Verjeana" written in a larger, more prominent script than the last name "McCotter-Jacobs".

Verjeana McCotter-Jacobs
Executive Director & CEO
National School Boards Association (NSBA)

¹² 2 See FCC to Review E-Rate Program to Ensure Congress's Vision, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, WC Docket Nos. 26-133, 13-184, 21-93 & 21-455, FCC 26-41, ¶ 45 (rel. June 26, 2026)