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Marlene Dortch
Office of the Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: FCC Wireline Competition Bureau, Petitions for Emergency Relief to Allow the Use of E-Rate Funds to Support Remote Learning During the COVID-19 Pandemic (WC Docket No. 21-31)

The National Association of Manufacturers (NAM) is pleased to provide the Federal Communications Commission with these comments on the proceeding considering “Petitions for Emergency Relief to Allow the Use of E-Rate Funds to Support Remote Learning During the COVID-19 Pandemic.” The NAM is the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states. Manufacturing employs 12.2 million men and women, contributes more than \$2 trillion to the U.S. economy annually, has the largest economic impact of any major sector, and accounts for nearly 62% of private-sector research and development.¹ The NAM is the powerful voice of the manufacturing community and the leading advocate for a policy agenda that helps manufacturers compete in the global economy and create jobs across the United States.

Digital infrastructure has played a critical role in all aspects of life in the COVID-19 pandemic, and this FCC proceeding highlights the importance of ensuring our broadband support mechanisms and regulatory frameworks are adapting to meet the needs of this unique moment. Before the COVID-19 crisis, manufacturers had been reliant on robust and reliable broadband infrastructure to carry out operations, and today our sector’s dependence on broadband is even more evident. Broadband is supporting remote work, training and education, and it is enabling new, technology-driven solutions that allow individuals to carryout in-person tasks while maintaining safe distances.

The COVID-19 pandemic has forced many educational institutions to shift from the conventional classroom and to use digital solutions to continue educating students. Ensuring the FCC’s current programs for schools and libraries are adapting to meet these new remote needs is of critical importance, and the cost of not responding to the changing environment is high. Manufacturing in the United States depends on a strong workforce to innovate and succeed, and the manufacturing talent pipeline is predicated on a strong educational foundation. An OECD analysis predicts the long-term economic cost of COVID-19 induced school closures on the U.S. economy could total \$14.2 trillion, on the lower end, and that study predicts that grade school students impacted by school closures could suffer up to 3% lower income in their lifetimes, with more disadvantaged students potentially seeing greater losses.²

¹ <https://www.nam.org/facts-about-manufacturing/>

² <https://www.oecd.org/education/The-economic-impacts-of-coronavirus-covid-19-learning-losses.pdf>

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The E-Rate program, formally known as the schools and libraries universal service support mechanism, provides support for the provision of services and equipment for schools and libraries to provide connectivity for educational purposes. The current proceeding is examining whether E-Rate should be expanded to support connectivity at home for remote learning necessitated by the COVID-19 pandemic. Manufacturers support efforts to allow E-Rate funds to be used to connect students in off-campus settings, and to increase access to students who need it most in digital classrooms today.

As the FCC looks to adapt the E-rate program, the current proceeding should be targeted to meet the temporary, time-sensitive needs of the current public health crisis, by providing broadband access and equipment to ensure students are not left out of the digital classroom. The FCC should continue to remain technology neutral when defining eligible equipment and services for this emergency relief. For this and future proceedings, the FCC should broadly identify ways to reduce the burden on recipient schools and libraries to ensure the funds can be delivered in a timely manner, including by examining rules and procedures that prevent the program from meeting current educational needs.

The FCC should coordinate with the Department of Education on necessary revisions to the E-Rate program or to build consensus on new alternatives that can close the digital divide. Efforts to meet the broadband and wireless connectivity needs of students and teachers should consider funding mechanisms outside the Universal Service Fund (USF) framework. A recent analysis puts the cost of closing the digital divide for students at between \$6 billion and \$11 billion in the first year and between \$4 billion and \$8 million per year in the following years.³ Building comprehensive solutions will require a modernized approach to funding distinct from the USF mechanism.

Manufacturers recognize that enhanced broadband investment and the growth of next generation wireless networks are critical both for the current challenges in COVID-19 and to support continued U.S. technological leadership. We appreciate the opportunity to comment on this petition and look forward to continuing to work with the FCC and policymakers to advance our nation's digital infrastructure.

Comments submitted electronically by:

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³ https://www.commonsensemedia.org/sites/default/files/uploads/kids_action/final_-what_it_will_take_to_permanently_close_the_k-12_digital_divide_vjan26_1.pdf