In the Matter of

Emergency Connectivity Fund to
Address the Homework Gap

WC Docket No. 21-93

REPLY COMMENTS OF THE CONSORTIUM FOR SCHOOL NETWORKING

The Consortium for School Networking (CoSN) respectfully submits these Reply
Comments urging the Federal Communications Commission ("Commission") to consider the
following additional recommendations as the agency develops rules for the Emergency
Connectivity Fund ("ECF"). CoSN supports Education Superhighway's Comments regarding
data collection and transparency recommendations, and the Schools, Health & Libraries
Broadband Coalition's (SHLB) Comments regarding forgoing competitive bidding, and SHLB's
recommendation to waive or eliminate applicable cost allocation rules. CoSN also provides
further information herein about our remote learning study and its potential implications for
device purchases through the ECF and other programs.

**COSN SUPPORTS EDUCATION SUPERHIGHWAY'S DATA COLLECTION AND
TRANSPARENCY RECOMMENDATIONS**

CoSN supported the Commission's decision to apply data transparency requirements to
the E-rate when the agency successfully modernized the program in 2014. Reasonable reporting
requirements about ECF purchases will provide important insights about the market conditions
facing school districts. This information will empower school districts to make sound purchasing
decisions in the future and help policy makers understand the ECF's impact on connecting
students to remote learning, including identifying the populations served by the program. With

these goals in mind, we urge the Commission to use the E-rate rules and practices to make all line-item procurement data publicly available, including the data elements listed in Education SuperHighway's initial comments. The Commission should take care to ensure that this reporting is not overly burdensome. CoSN's Comments strongly advocate for using a budget cap model to ensure that the application process is simple so that as many districts as possible – especially districts that lack the personnel or resources to complete a complex application - participate in the program. Likewise, reporting should be simple and limited to "need to know" information to help other school districts and policy makers.

COSN AGREES WITH THE SHLB COALITION THAT THE COMMISSION SHOULD NOT USE A COMPETITIVE BIDDING PROCESS AND SHOULD WAIVE OR ELIMINATE THE COST ALLOCATION RULE

CoSN supports the SHLB Coalition's Comment urging the Commission to forego using a competitive bidding process and that the Commission should waive or eliminate the cost allocation rule. State and local procurement rules are sufficient to ensure that rates are "reasonable." A budget caps model would also provide protection against wasteful spending. We agree with the Commission's public notice which correctly suggests that schools and libraries should "certify that they have complied with all applicable state, Tribal, or local procurement requirements with respect to the contracts they used to purchase eligible equipment and services." Additionally, the Commission should waive or eliminate the cost allocation rule so that ECF recipients have maximum flexibility to serve their students using all available equipment without burdensome "red tape".

FURTHER INFORMATION ABOUT COSN's COMMENTS REGARDING ENSURING ACCESS TO SUFFICIENTLY POWERFUL LEARNING DEVICES.

Based on our recent study of the aggregate and deidentified data of 750,000 students remote learning experiences at 13 school districts, CoSN's initial Comments recommended that

the Commission acknowledge that remote learning students require more powerful learning devices. Specifically, CoSN's initial Comments recommend that CPUs be equipped with at least Intel i3 or equivalent. This recommendation was a reference to Chromebook specifications, but the concept applies across manufacturers and products. For further information, we refer the Commission to Google for Education's publication, *Selecting the Right Chromebook for Your School, Staff and Students.*[1] Based on our remote learning study, we recommend that all manner of home learning devices supported by the ECF be capable of executing the activities described by this publication's "Advance Uses", which include "heavy workloads" such as content creation and editing, coding, running apps in virtualized environments, heavy multitasking (e.g., large video calls with 15+ participants, multiple browser tabs, Google Workspace, external monitors/displays). CPUs of other manufactures selected by ECF participants should be similarly powerful and capable of completing these tasks.

Respectfully submitted,

/s/ Keith Krueger

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[1] Google for Education, *Selecting the Right Chromebook for Your School, Staff and Students*, available online at https://edu.google.com/products/chromebooks/