



THE UNITED STATES
CONFERENCE OF MAYORS



October 13, 2026

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

Re: 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; Establishing the Emergency Connectivity Fund to Close the Homework Gap, WC Docket No. 21-93; and Promoting Fair and Open Competitive Bidding in the E-Rate Program, WC Docket No. 21-455

To Whom It May Concern:

On behalf of the national associations representing counties, cities, towns and municipalities, the National Association of Counties (NACo), the National Association of Telecommunications Officers and Advisors (NATOA), the U.S. Conference of Mayors (USCM) and the Government Finance Officers Association (GFOA) submit these comments to the Federal Communications Commission (Commission) in response to the above referenced proceedings.

The Commission's obligation under the Telecommunications Act of 1996's Section 254 Universal Service mandate is clear in ensuring schools and libraries are granted meaningful and ongoing access to advanced telecommunications services and connectivity. Over the last three decades, the Commission's E-Rate Program has met the connectivity needs of schools and libraries by allowing eligible applicants to access discounts to telecommunications equipment and connectivity infrastructure through a competitive bidding process.

The E-Rate Program is permitted to provide up to \$4 billion in reimbursement to applicants who represent over 110,000 schools and libraries across the country. The program represents the fifth largest source of federal funding that supports school districts, and it is the only federal program focused on technology in the education sector. The program accounts for applicant need by implementing a sliding scale of offered discounts based on the poverty rate of a particular school district and whether the district is urban or rural.

Access to advanced telecommunications equipment and services is an ongoing cost – not a one-time cost – and discounts provided through the E-Rate Program permit entities to afford such services and provide them to students and patrons. Ending the E-Rate Program would prove to have a detrimental effect on institutions' abilities to continue to afford such services – particularly in rural and lower-income communities.

The associations therefore support the continuation of the E-Rate Program and urges the Commission to not sunset the program. The E-Rate Program ensures that the connectivity



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experience in schools and libraries across the country is consistent and designed to meet educational and learning needs.

Sincerely,

A handwritten signature in black ink that reads 'Christopher P. Morrill'.

Chris Morrill
Executive Director/CEO
Government Finance Officers Association

A handwritten signature in black ink that reads 'Matthew D. Chase'.

Matthew D. Chase
Executive Director/CEO
National Association of Counties

A handwritten signature in black ink that reads 'Tom Cochran'.

Tom Cochran
CEO and Executive Director
The United States Conference of Mayors

A handwritten signature in black ink that reads 'Tonya Rideout'.

Tonya Rideout
Executive Director
National Association of
Telecommunications Officers and Advisors