

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

In the Matter of:

Modernizing the E-Rate Program for Schools and Libraries))))	WC Docket No. 13-184
Addressing the Homework Gap through the E-Rate Program))	WC Docket No. 21-31

**Reply in Support of Petition for Reconsideration
by the**

**American Library Association and the
Schools, Health & Libraries Broadband Coalition**

The American Library Association (ALA)¹ and the Schools, Health & Libraries Broadband Coalition (SHLB)² have long supported the E-Rate program and the critical role it plays in ensuring our libraries and schools have affordable broadband for use by staff, patrons, and students. Over many years our two organizations have filed numerous comments on E-Rate Notices released by the Federal Communications Commission (Commission, FCC) and we have often met with Commission staff to state our support for the E-Rate program and suggest improvements as needed.

On September 30, 2025, the Commission adopted an Order on Reconsideration³ which granted the Petition for Reconsideration filed in July 2024 by Maurine and Matthew Molak (2025 Hotspots Order on Reconsideration).⁴ The 2025 Hotspot Order on Reconsideration rescinded the Commission’s previously adopted 2024 wi-fi hotspots order (2024 Hotspots Order) that allowed

¹ The American Library Association (ALA) is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. ALA represents the nations 123,000 libraries, which includes 17,000 public libraries.

² SHLB is a broad-based public interest coalition of more than 320 organizations that share the goal of promoting open, affordable, high-quality broadband for anchor institutions and their communities.

³ Addressing the Homework Gap through the E-Rate program. (2025 Hotspot Order on Reconsideration). WC Docket No. 21-31. September 30, 2025.

⁴ Maurine and Matthew Molak *Petition for Reconsideration* (Molak Petition). WC Docket No. 21-31. July 31, 2024.

schools and libraries to use E-Rate funds to purchase wi-fi hotspots for off-campus use by students and patrons who lacked internet access.⁵ In a related September 30 action, the Commission adopted a declaratory ruling (2025 Bus Ruling)⁶ that rescinded the Commission’s previously adopted 2023 school bus wi-fi declaratory ruling (2023 Bus Ruling) that allowed E-Rate funds to support internet access for students on school buses.⁷

Two organizations filed Petitions for Reconsideration related to the Commission’s September 30, 2025, actions that reversed these programs. The first petition was filed by American e-Rate Solutions⁸ in October 2025 (American Petition). The second petition was filed by the California Public Utilities Commission⁹ in November 2025 (CPUC Petition). *The ALA and SHLB support these petitions, agreeing that it is in the public interest for the Commission to reconsider its actions.*

Among other arguments, both petitions rightly point out that the 2025 Hotspot Order on Reconsideration and 2025 Bus Ruling would negatively impact efforts to address the digital divide. For example, the American Petition correctly states that the Commission’s 2025 Hotspot Order on Reconsideration “reverses years of policy progress that have helped millions of students bridge the digital divide and it contradicts both the text and intent of Section 254 of the Communications Act of 1934....”¹⁰ The petition also states that millions of students still do not have reliable residential internet access and that the FCC’s action “disproportionately affects students from low-income households, minority groups, and rural areas.... The result is a disproportionate impact on the very populations the Universal Service Fund was created to support.”¹¹ The CPUC Petition also states this same concern: “The Commission’s abrupt and unfounded reversal of its previous orders...harms the public interest due to its negative impact on students in low-income, rural, and urban disadvantaged communities.”¹²

Our organizations raised similar concerns when the FCC published a news release on September 3, 2025,¹³ that called for a vote to rescind those programs. We submitted a letter to the Commission showcasing examples of the opportunities that students and library patrons are afforded when they have essential internet access through wi-fi hotspots and connectivity on

⁵ 2024 *Wi-Fi Hotspots Order*. (2024 *Hotspots Order*). WC Docket No. 21-31. July 18, 2024.

⁶ *Declaratory Ruling* rescinding the 2023 School Bus Wi-Fi ruling. WC Docket No. 13-184. September 30, 2025.

⁷ 2023 *School Bus Wi-Fi Declaratory Ruling* (2023 *Bus Ruling*). WC Docket No. 13-184. October 19, 2023.

⁸ American e-Rate Solutions *Petition for Reconsideration* (American Petition). WC Docket No. 13-184. September 20, 2025.

⁹ California Public Utilities Commission *Petition for Reconsideration* (CPUC Petition). WC Docket No. 21-31 and WC Docket No. 13-184. November 18, 2025.

¹⁰ American Petition, p. 1.

¹¹ *Id.*, p. 2.

¹² CPUC Petition, p. 6.

¹³ “Carr Proposals Would End FCC’s Unlawful Biden-Era Expansion of COVID Spending Program.” September 3, 2025.

school buses. We also outlined our concerns for these same communities should the Commission take that access away. In part, the letter states:

E-Rate Advocates believe that overturning these programs would negatively affect community members nationwide by cutting off access to critical connectivity resources – namely those that enable students and library patrons to complete homework assignments or engage in services that define modern-day life.¹⁴

We encourage the Commission to review our complete letter, which provides more details on the harm this rescission will do to unconnected patrons and students.

The American Library Association and the Schools, Health & Libraries Broadband Coalition agree that the Commission’s reversal of these programs harms the public by eliminating essential connectivity resources to the communities that the Universal Service Fund was created to connect. This is especially of concern given that these actions were taken without providing ample notice to schools and libraries. We thus support the American Petition and the CPUC Petition that ask the Commission to reconsider the 2025 Hotspot Order on Reconsideration and 2025 Bus Ruling.

Respectfully,

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¹⁴ ALA, SHLB, et al., letter to Commissioners stating concern about Chairman Carr’s request. WC Docket No. 21-31 and WC Docket No. 13-184. September 23, 2025.