

September 4, 2025

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: Ex Parte Filing:

Addressing The Future of Universal Service Fund (including E-Rate and Rural Health Care)

Delete, Delete, Delete, GN Docket No. 25-133
Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6
Federal-State Joint Board on Universal Service, CC Docket No. 96-45
Changes to the Board of Directors of the Board of Directors of the National Exchange
Carrier Association, Inc., CC Docket No. 97-21
Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184
Promoting Telehealth in Rural America, WC Docket No. 17-310
Rural Health Care Support Mechanism, WC Docket No. 02-60

Dear Madam Secretary:

Pursuant to Federal Communications Commission's *ex parte* rules, I hereby submit the following summary of a meeting having taken place on September 2, 2025. Attendees included:

- Joey Wender, Executive Director, Schools Health and Libraries (SHLB) Broadband Coalition
- Megan Janicki, Deputy Director, Public Policy & Advocacy, American Library Association
- Noelle Ellerson Ng, Chief Advocacy & Governance Officer, AASA, The School Superintendents Association
- Jon Bernstein, President, Bernstein Strategy Group
- Callie Coker, Legal Advisor to Chairman Carr

We started by introducing ourselves and our respective organizations to Ms. Coker, explaining that we represented a broad and diverse set of stakeholders that support both the E-Rate and Rural Health Care (RHC) programs. We emphasized the continued importance of E-Rate and RHC to schools, libraries and health clinics around the country, and voiced our support for the FCC and Congressional USF Working Group to take up and address contribution reform

by expanding and modernizing the contribution base. We also noted the need for increased bandwidth and speed in anchor institutions as well as the countless aspects of both education and operations that rely on internet access in schools and libraries.

We also noted a number of proposals submitted in the *Delete, Delete, Delete* docket that the FCC could implement to help streamline and modernize the two above-mentioned USF programs.¹

For E-Rate, we mentioned:

- Delete FCC Form 486
- Eliminate the “extraordinary circumstance” invoice deadline waiver standard
- Delete USAC post-audit “policies and procedures” requirement
- Delete statement that Demand Payment Letters cannot be appealed
- Eliminate program procedures that hinder transitioning between service providers
- Eliminate program procedures that disallow bandwidth increases
- Eliminate Form 470 drop-down menu categories confusion
- Purchases of E-Rate eligible services and equipment of less than \$10,000 (pre-discount) be exempt from Commission bidding requirements but be subject to current library and school bidding requirements

For RHC, we mentioned:

- Delete rule section 54.605 – Methods 1, 2, and 3 for Telecom Program rural rates
- Delete rule section 54.622(i)(3) – approval of “evergreen” contracts

We invited Chair Carr and his staff to visit libraries and schools and meet with staff, students, and library patrons. The attendees appreciated the opportunity to speak with Chairman Carr’s staff and look forward to future discussions. The Universal Service Fund programs remain vitally important; SHLB, EdLiNC, ALA, and AASA remain available as partners in the work of reform to ensure the Fund’s sustainability for decades to come.

Sincerely,

/s/ Joseph Wender

Executive Director

Schools, Health & Libraries Broadband (SHLB) Coalition

1250 Connecticut Ave. NW Suite 700

¹ See Comments of the Schools, Health & Libraries Broadband Coalition (SHLB), *Delete, Delete, Delete*, GN Docket No. 25-133, *Schools and Libraries Universal Service Support Mechanism*, CC Docket Nos. 02-6, 96-45, 97-21, *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, *Promoting Telehealth in Rural America*, WC Docket No. 17-310, *Rural Health Care Support Mechanism*, WC Docket No. 02-60 (filed Apr. 11, 2025); Comments of the American Library Association (ALA), *Delete, Delete, Delete*, GN Docket No. 25-133, *Schools and Libraries Universal Service Support Mechanism*, CC Docket Nos. 02-06, 96-45, 97-21, *Modernizing the E-Rate program for Schools and Libraries*, WC Docket No. 13-184 .

Washington, DC 20036
jwender@shlb.org

cc via email: Callie Coker