

September 12, 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

Schools and Libraries Cybersecurity Pilot Program, WC Docket No. 23-234

Addressing the Homework Gap Through the E-Rate Program, WC Docket No. 21-31

Dear Madam Secretary:

Pursuant to Federal Communications Commission's *ex parte* rules, I hereby submit the following summary of two meetings having taken place on September 10, 2025. Attendees in both meetings 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

The above group met with Marcus Maher, Senior Legal Advisor to Commissioner Trusty, and separately met with Jonathan Uriarte, Strategic Communications and Policy Advisor to

Commissioner Gomez and Harsha Mudaliar, Policy Advisor and External Affairs Liaison to Commissioner Gomez.

We started by introducing ourselves and our respective organizations to FCC staff, 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, libraries, and health clinics.

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 further discussed the school bus Wi-Fi and remote hotspots program and expressed our concern about recent statements by Chairman Carr’s office about their plan to end both programs.² We also specifically discussed the potential adverse impact on recipients in the 2024

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.

² Carr Proposals Would End FCC’s Unlawful Biden-Era Expansion of COVID Spending Program, News Release (Sept. 3, 2025) <https://docs.fcc.gov/public/attachments/DOC-414268A1.pdf>.

and 2025 calendar years, as schools and libraries have already contracted with providers and deployed the equipment given existing federal funding commitments (for 2024) and reliance on the eligible services list (for 2025). We argued that recipients should have ample notice of any potential changes to the E-Rate program and that proposed changes should be considered in a formal rulemaking, allowing an opportunity for recipients and stakeholders to make public comments.

We additionally discussed the Cybersecurity Pilot Program and our support for the program.

We invited the Commissioners and their staff to visit libraries, schools, and health clinics and meet with staff, students, and library patrons. The attendees appreciated the opportunity to speak with Commission 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
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