

2020 POLICY ROADMAP



THE SCHOOLS, HEALTH & LIBRARIES BROADBAND COALITION

PROMOTING OPEN, AFFORDABLE, HIGH-QUALITY BROADBAND FOR ANCHOR INSTITUTIONS AND THEIR COMMUNITIES

POLICY ROADMAP

Two over-arching principles guide the SHLB Coalition's Policy Roadmap:

- All community anchor institutions (CAIs) should have affordable access to gigabit broadband, as called for in National Broadband Plan Goal #4.
- Deploying broadband <u>"to and through" CAIs</u> to connect their surrounding communities is an effective strategy to help solve the digital divide.

To fulfill these principles, the SHLB Coalition will focus on six priorities in 2020. All of the issues below are of equal importance.

#1: Increase Funding and Improve the Administration of the FCC's Rural Health Care Program

The Federal Communications Commission's Rural Health Care (RHC) program suffers from insufficient funding, and a slow, cumbersome administrative process. The FCC's August 2019 Order improved the program somewhat, but the Order discriminates against consortia and unlawfully delegates rate-setting authority to the Universal Service Administrative Company (USAC), the third-party administrator of the RHC. SHLB will pursue the following policy changes in 2020:

- Funding for the RHC program should be substantially increased, based on demand data.
- The FCC and USAC should process RHC program applications faster and with more transparency.
- The FCC should establish rates based on competitive market forces and actual costs.

#2: Streamline and Strengthen the E-rate Program

The FCC adopted several SHLB recommendations to improve the E-rate program in 2019, such as waiving the fiber amortization rule, providing consistent funding for Category Two equipment and services, and opening a proceeding to improve the drop-down menu. SHLB will pursue the following policy changes to further strengthen E-rate in 2020:

- Improve the Form 470 drop-down menu to eliminate applicant and service provider confusion.
- Maintain the competitive bidding process.
- Fund necessary network security equipment and services.
- Fund Wi-Fi on school buses for digital inclusion.
- Open E-rate-funded networks to the surrounding community, provided E-rate dollars do not pay for these extensions.
- Clarify the transition of services and the gift rules.

#3: Ensure that Broadband Funding Programs Include Community Anchor Institutions

Private sector investment in broadband networks is imperative to connecting all CAIs, and government funding is necessary to connect areas that the private sector cannot reach. Broadband funding programs should:

- Take a technology-neutral approach.
- Authorize infrastructure spending to build high-speed, scalable broadband networks connecting CAIs and their communities that is open to interconnection to spur additional investment.
- Fund CAI digital inclusion activities to ensure everyone can obtain affordable broadband service and has basic digital skills to use it.

#4: Increase Competition through Additional Access to Licensed and Unlicensed Spectrum

Freeing up additional licensed and unlicensed spectrum gives CAIs more cost-effective options for their broadband service needs. CAIs need the flexibility to choose the best connectivity solution for their unique situations. SHLB recommends the FCC take the following steps:

- Maximize the potential for unlicensed use of TV White Spaces spectrum.
- Allow schools and nonprofit organizations an opportunity to obtain unused Educational Broadband Service licenses to serve rural markets.
- Make 6 GHz spectrum available for unlicensed use to address the shortage of Wi-Fi spectrum while protecting the needs of existing users of this band.

#5: Simplify and Strengthen the Universal Service Fund

The Universal Service Fund (USF) provides essential and ongoing financial support to ensure that all consumers have access to affordable broadband services, including schools, libraries and healthcare providers. The SHLB Coalition will collaborate with policymakers and fellow advocates to safeguard and improve the USF in the following ways:

- Give applicants the option to seek funding from the E-rate and RHC programs in one application.
- Reject the proposal to place an overall cap on the entire USF.
- Replace the outdated contribution mechanism with a more stable, long-term funding source for the USF.

#6: Develop More Accurate and Granular Broadband Mapping Data that Includes Anchor Institutions

Existing broadband maps significantly overstate the actual availability of broadband service and could be used to prevent funding to communities and CAIs that do not have access to adequate broadband services. Current maps also lack sufficient data about the broadband available to and used by CAIs. SHLB will work to improve broadband mapping as follows:

- Broadband maps should be based on more accurate and more granular data, so that funding programs are right-sized and CAIs and communities without adequate broadband are accurately identified.
- The process for challenging industry-provided data should be streamlined and simplified.
- Broadband maps should not be allowed to be used prevent CAIs from obtaining lower-cost services from competitive providers.

ABOUT SHLB

The SHLB Coalition is a nonprofit, 501(c)(3) advocacy organization that supports open, affordable, high-quality broadband connections for anchor institutions and their surrounding communities. The SHLB Coalition is based in Washington, D.C. and has a diverse membership of commercial and non-commercial organizations from across the United States. To learn more, visit www.shlb.org.

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