2022
POLICY ROADMAP

MARCH 2022

SHLB
SCHOOLS, HEALTH & LIBRARIES
BROADBAND COALITION

The Schools, Health & Libraries Broadband Coalition
Promoting Open, Affordable, High-Quality Broadband for Anchor Institutions and Their Communities

Policy Roadmap

The Schools, Health & Libraries Broadband (SHLB) Coalition promotes open, affordable, high-quality broadband for anchor institutions and their communities. Each year, the SHLB Coalition issues a policy roadmap to shape our advocacy for anchor institution broadband. While the priorities outlined in the roadmap serve as guideposts, SHLB remains flexible in our advocacy efforts and adapts to the dynamic policy landscape.

> *Community Anchor Institution (CAI): A nonprofit community organization such as a school, library, hospital, health clinic, community center, higher education institution, public housing, house of worship etc. CAIs often need high-capacity broadband and facilitate greater use of broadband by vulnerable populations, including low-income residents, the unemployed, and the aged.*

CAIs deserve a prominent place in the nation's broadband policy framework because of their critical role in providing education, healthcare, research, and access to information. SHLB encourages the deployment of broadband networks "to and through" anchor institutions to reach surrounding residential communities.

To advance our mission and close the digital divide, SHLB has identified the below policy priorities for 2022.

Digital Equity

Ubiquitous, affordable broadband access is an important step to achieve digital equity, which the National Digital Inclusion Alliance defines as "a condition in which all individuals and communities have the information technology capacity needed for full participation in our society, democracy, and economy." In addition to providing broadband access to surrounding households, anchor institutions are a pivotal piece of the digital equity puzzle. The SHLB Coalition supports digital equity efforts such as the Digital Equity Act and the Affordable Connectivity Program to provide low-cost broadband access, digital literacy training and affordable devices to people in need. If provided with the right resources, anchor institutions can provide the local leadership and expertise to build a strong "digital inclusion ecosystem" in every community.

E-rate and Emergency Connectivity Fund Programs

The E-rate program has been an extremely successful tool for funding school and library broadband since its inception in 1996. The SHLB Coalition will continue working to modernize and expand the reach of E-rate in the coming year. Our January 2021 "E-rate to the Home" petition laid the groundwork for a new program: the Emergency Connectivity Fund (ECF). As both programs are critical for connecting students and library patrons, SHLB will work with policymakers on the following E-rate/ECF priorities:

- Create permanent funding for a combined E-rate/ECF program so that schools and libraries can solve the "Homework Gap" by ensuring all students and library patrons have adequate broadband access both on-campus and off-campus.
- Oppose the proposal for an E-rate federal competitive bidding portal, which could preempt local decision-making and create significant confusion for applicants.
- Add cybersecurity expenses to the list of E-rate eligible services and equipment.
- Waive the E-rate cost allocation rule to promote extensions of broadband service to the home.
- Secure a third ECF application window.

Broadband Infrastructure

Congress provided an historic level of funding for broadband programs in 2021, including the Connecting Minority Communities Pilot Program, the Tribal Broadband Connectivity Program, the Broadband Equity, Access, and Deployment (BEAD) Program, the Enabling Middle Mile Broadband Infrastructure Program, and the Digital Equity Act, all of which target the digital divide. The SHLB Coalition will work closely with the National Telecommunications and Information Administration, the Department of Treasury, and Congress on the following priorities as they implement the new infrastructure funding:

- Ensure that anchor institutions are eligible to receive broadband service from funding recipients to enable service to unserved and underserved homes.
- Promote long-lasting, future-proof broadband infrastructure that is open to interconnection and shared use.
- Ensure that decision-makers examine supplemental data from state and local maps, in addition to the FCC's broadband maps, before making funding decisions.

Telehealth

Thanks to SHLB's advocacy, Rural Health Care (RHC) Program operations have improved over the last few years. However, the greater demand for telemedicine and additional bandwidth means that the RHC has outgrown its $612 million budget cap. Furthermore, RHC applicants still experience excessive delays in the processing of some applications. SHLB will continue to address these concerns by:

- Convening regular meetings with officials from the Universal Service Administrative Company (USAC) and the Federal Communications Commission to reduce application processing delays.
- Strengthening RHC program rules by recommending increased funding and expanding coverage in rural markets in the FCC's February 2022 rulemaking proceeding.
- Proposing legislative language for Congress to expand eligible healthcare providers in the RHC program and obtain additional funding above the current cap.

Broadband Mapping

Broadband maps are critical for targeting capital to the areas most in need, but creating accurate and granular broadband maps is easier said than done. FCC maps tend to overstate broadband availability and — even worse — do not include community anchor institutions. Congress passed the Broadband DATA Act in 2020 to try ameliorating the FCC's mapping flaws, but the legislation leaves many policy priorities for SHLB to pursue:

- Examine the pros and cons of various mapping methodologies, particularly as they relate to anchor institution broadband.
- Encourage government officials to incorporate state and local data in broadband maps and to chart the quality – speed, latency, reliability, and "on-the-ground" availability – of broadband service.

Spectrum

Anchor institutions are both users and providers of wireless broadband services. With this interest in mind, SHLB continues to promote rules that help anchor institutions take advantage of these spectrum opportunities. Specifically, we will pursue policies that promote competition and make more licensed and unlicensed spectrum and funding available for schools, higher education, libraries, and other anchor institutions.

Pole Attachments

Gaining access to telephone poles and other rights-of-way can significantly impact the pace of broadband deployment to anchor institutions and rural communities. To reduce these barriers while still respecting localities' rights to administer these assets, SHLB will focus on the following priorities in 2022:

- Build support for our Pole Attachment Principles with federal, state, and local government officials.
- Provide comment on the FCC's latest rulemaking proceeding on pole replacements and advocate for further action by highlighting real-world impacts of rights-of-way and permitting challenges.
- Identify pole problems and suggest solutions to NTIA and the Department of Treasury as they administer their broadband funding programs.

Higher Education

Higher education organizations play an instrumental role in the development and expansion of broadband networks. These institutions are key partners for the many state-based research and education (R&E) networks that have extended their connectivity to reach K-12 schools, libraries, and even telehealth centers.

SHLB supports policies and programs that leverage the expertise of R&E networks and higher education institutions to address the digital divide. Our 2022 advocacy in this realm will center on NTIA's Connecting Minority Communities Pilot Program, which will fund "to and through" efforts led by historically Black colleges and universities and other minority-serving institutions. SHLB intends to work with NTIA and the awardees to help them successfully bring affordable broadband to the institutions and their surrounding communities.

Anchor Connectivity Initiative

Anchor institutions often have high-capacity fiber connections that can provide a jumping-off point to facilitate broadband connectivity to the surrounding residential and business community. In 2021, SHLB created an Anchor Connectivity Initiative to create support for this deployment philosophy and highlight examples of anchor institutions extending service to the surrounding community. In 2022, SHLB will:

- Recommend government policies that foster the deployment of these broadband networks.
- Research the economic impacts of these anchor-enabled networks.

Universal Service Fund

The Universal Service Fund (USF) provides essential financial support that enables schools and libraries, healthcare providers, low-income consumers, and consumers in high-cost areas to obtain essential broadband services. Unfortunately, the future of the USF is uncertain. USF funding is generated by assessing a fee on a subset of telecommunications services – an antiquated system that has not been updated in 25 years.

In 2021, SHLB led a collaborative effort to recommend a fairer and more stable revenue source for the USF. SHLB joined with INCOMPAS and NTCA – The Rural Broadband Association, to commission the "USForward" study that recommends including broadband internet access services in the funding mechanism. In 2022, SHLB will:

- Continue to educate policymakers about the need for USF contribution reform.
- Defend the constitutionality of the USF system in various appellate court proceedings.
- Participate in the FCC's report to Congress on the future of the USF program.

Research and Other Initiatives

SHLB is committed to being the neutral, data-driven authority on community anchor institution broadband policy issues through its research and publications. SHLB will also support federal government nominees and officials who endorse our policy issues.

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.

The SHLB Coalition is grateful to our over 300 members and to our corporate sponsors: