



April 23, 2026

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: Ex Parte Filing:

Promoting Fair and Open Competitive Bidding in the E-Rate Program, WC Docket No. 21-455

Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6

Dear Madam Secretary:

Pursuant to Federal Communications Commission’s (Commission) ex parte rules, I hereby submit the following summary of a meeting having occurred on April 21, 2026 between members of the Schools, Health & Libraries Broadband Coalition (SHLB) and Jonathan Uriarte, Policy and Strategic Communications Advisor to FCC Commissioner Anna Gomez to discuss the Commission’s draft *Report and Order and Order on Reconsideration* that would amend E-Rate program rules.¹ Those who attended the meetings represent various organizations, and together with SHLB, are collectively referred to as the “E-Rate Advocates”² and are listed in the attached Exhibit.

During the meeting, the E-Rate Advocates reaffirmed that they ultimately do not believe that the Commission needs to implement any aspect of the bidding portal. Current E-Rate program mechanisms and safeguards are already working to strengthen program integrity, and there is no

¹ *Promoting Fair and Open Competitive Bidding in the E-Rate Program, WC Docket No. 21-455 Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Report and Order and Order on Reconsideration, Draft on Circulation, FCC-CIRC2604-05 (Apr. 9, 2026) (Draft Order).*

² In addition to SHLB, the other organizations forming the E-Rate Advocates are American Library Association (ALA), American Federation of School Administrators and the National Education Association, CoSN – Consortium for School Networking, and Broadband Legal Strategies, LLC.

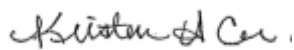
evidence of widespread waste, fraud, and abuse in the competitive bidding process. The bidding portal would also create overbroad burdens and obligations on applicants and service providers.

Should the FCC decide to move forward, however, we explained that the Commission could instead adopt a simpler document *repository* requirement as an alternative. We explained that a repository approach could have several advantages over the proposed portal, including: reducing questions during USAC and PIA review, ensuring bid document retention, avoiding potential conflicts with state and local procurement laws; and avoiding unnecessary denials for procedural errors. We also explained how this approach would better align with the Inspector General's recommendation.³

We also reemphasized that, whether the Commission adopts the bidding portal or a simpler document repository, it should take certain procedural actions. This includes taking public comment and requiring beta testing prior to the bidding portal rollout, ensuring mechanisms are available after rollout to answer questions and release public guidance in a timely way, and extending the effective date of the bidding portal implementation for at least one year.

We thank the Commission for taking the time to consider our concerns. Please do not hesitate to contact me if you have any questions.

Sincerely,



Kristen Corra
Policy Counsel
Schools, Health & Libraries Broadband (SHLB) Coalition
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cc via email: Jonathan Uriarte

³ See SHLB Ex Parte to Danielle Thumann, Senior Counsel to FCC Chairman Brendan Carr, and Marcus Maher, Senior Legal Advisor to FCC Commissioner Olivia Trusty, Promoting Fair and Open Competitive Bidding in the E-Rate Program, WC Docket No. 21-455, Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6 (Apr. 17, 2026). The E-Rate Advocates also filed an additional comprehensive letter outlining this approach. See SHLB, et al. Ex Parte Letter, Promoting Fair and Open Competitive Bidding in the E-Rate Program, WC Docket No. 21-455, Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6 (Apr. 22, 2026).

EXHIBIT

Attendees in the April 21, 2026 meeting between E-Rate Advocate representatives and Jonathan Uriarte, Policy and Strategic Communications Advisor to FCC Commissioner Anna Gomez included:

- Joey Wender, Executive Director, SHLB
- Kristen Corra, Policy Counsel, SHLB
- Gina Spade, Broadband Legal Strategies, LLC
- Robert Bocher, Senior Fellow, American Library Association (ALA)
- Megan Janicki, Deputy Director, Public Policy & Advocacy, ALA
- Jon Bernstein, President, Bernstein Strategy Group (representing the American Federation of School Administrators and the National Education Association)
- Keith Krueger, CEO, CoSN – Consortium for School Networking