

April 15, 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 two meetings discussing the Commission's draft *Report and Order and Order on Reconsideration* that would amend E-Rate program rules.¹ Members of the Schools, Health & Libraries Broadband Coalition (SHLB) who attended the meetings represent various organizations, and together with SHLB, are collectively referred to as the "E-Rate Advocates."² Attached as an Exhibit are the list of attendees at the April 13, 2026 meeting with members of the Wireline Competition Bureau (WCB) and the attendees at the April 14, 2026 meeting with Jonathan Uriarte, Policy and Strategic Communications Advisor to FCC Commissioner Anna Gomez.

During the meetings, we recognized the importance of maintaining the integrity of the E-Rate program. However, we reiterated our opposition to the proposed competitive bidding portal, as explained in our prior comments.³ We expressed our concern that 1) the implementation of the bidding portal would create excessive burdens on applicants, service providers, and USAC personnel (which could deter program participation); 2) the Draft Order lacks an analysis concerning the costs of creating, implementing, and managing the bidding portal; and 3) the bidding portal functionality would create real areas of

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, AASA, The School Superintendents Association, State E-Rate Coordinators' Alliance (SECA) and Broadband Legal Strategies, LLC.

³ See SHLB Comments and Reply Comments, SECA Comments and Reply Comments, and ALA Comments in Response to Notice of Proposed Rulemaking Promoting Fair and Open Competitive Bidding in the E-Rate Program, WC Docket No. 21-455 (Comments filed Apr. 27, 2022; Replies filed May 27, 2022).

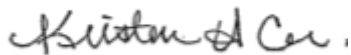
inconsistency and conflict with state and local requirements. We also mentioned that the effectiveness of the program’s existing protective measures has already been demonstrated in multiple ways.⁴

The E-Rate Advocates noted that the Draft Order contains several confusing provisions requiring clarification. To clarify ambiguities and consider streamlining recommendations on the portal framework, we asked the Commission to take public comment and require beta testing prior to the bidding portal rollout, ensure mechanisms are available after rollout to answer questions and release public guidance in a timely way, and extend the effective date of the bidding portal implementation.

The E-Rate Advocates also asked that the Commission change the waiver standard for late-filed invoices so that petitioners do not have to demonstrate “extraordinary circumstances” in order to receive relief for minor technical invoicing errors, and instead direct the Bureau to use the public interest standard that applies to waivers of all other E-Rate program rules.

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
Allison Baker
Bryan Boyle
Johnnay Schrieber
Gabby Gross
Kate Dumouchel
Johnny Roddy
Jennifer Mensah
Tiffany Purvis

⁴ See, e.g. Letter from Mark Stephens, Managing Director, FCC to Fara Damelin, Inspector General, FCC, re. Inspector General’s Top Management and Performance Challenges for FY 2025 for the Federal Communications Commission (Oct. 29, 2024). See also Report to Congressional Requesters, GAO-26-107444 (pub. Dec. 4, 2025, rel. Jan. 5, 2025), available at https://files.gao.gov/reports/GAO-26-107444/index.html?_gl=1*b7lkdm*_ga*NTY4NzIwOTE2LjE3NjkwOTU5MTE.*_ga_V393SNS3SR*czE3NjkwOTU5MTEkbzEkZzEkdDE3NjkwOTU5NDIkajI5JGwwJGgw

EXHIBIT

The first meeting took place on April 13, 2026 between E-Rate Advocate representatives and members of the WCB. Attendees in that meeting included:

- Joey Wender, Executive Director, SHLB
- Kristen Corra, Policy Counsel, SHLB
- Debra Kriete, South Dakota State E-Rate Coordinator and SECA past chair
- Gina Spade, Broadband Legal Strategies, LLC
- Jennifer McKee, 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)
- Noelle Ellerson Ng, Chief Advocacy & Governance Officer, AASA, The School Superintendents Association
- Allison Baker, Associate Bureau Chief, WCB
- Bryan Boyle, Division Chief, Telecommunications Access Policy Division, WCB
- Johnnay Schrieber, Deputy Division Chief, Telecommunications Access Policy Division, WCB
- Gabby Gross, Special Counsel, Telecommunications Access Policy Division, WCB
- Kate Dumouchel, Special Counsel, Telecommunications Access Policy Division, WCB
- Johnny Roddy, WCB
- Jennifer Mensah, WCB
- Tiffany Purvis, Attorney Advisor, WCB

The second meeting took place on April 14, 2026 between E-Rate Advocate representatives and Jonathan Uriarte, Policy and Strategic Communications Advisor to FCC Commissioner Anna Gomez. Attendees in that meeting included:

- Kristen Corra, Policy Counsel, SHLB
- Debra Kriete, South Dakota State E-Rate Coordinator and SECA past chair
- Gina Spade, Broadband Legal Strategies, LLC
- Jennifer McKee, Broadband Legal Strategies, LLC
- Robert Bocher, Senior Fellow, American Library Association (ALA)
- Jon Bernstein, President, Bernstein Strategy Group (representing the American Federation of School Administrators and the National Education Association)