

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter Of	)	
	)	
Modernizing the E-Rate Program for	)	WC Docket No. 13-184
Schools and Libraries	)	

**COMMENTS OF THE
SCHOOLS, HEALTH & LIBRARIES BROADBAND (SHLB) COALITION**

The Schools, Health & Libraries Broadband (SHLB) Coalition¹ respectfully submits these comments in response to the Wireline Competition Bureau's public notice seeking comment on the proposed eligible services list for funding year 2026 (Proposed ESL).² We take this opportunity to respond to the Bureau's questions regarding E-Rate support of managed internal broadband services (MIBS), specifically addressing whether applicants find substantial benefits for funding MIBS, and how the Bureau can alleviate possible confusion applicants might face when determining the eligibility of MIBS.

I. FUNDING MIBS PROVIDES SUBSTANTIAL BENEFITS TO SCHOOL AND LIBRARY APPLICANTS.

The Commission previously concluded that funding MIBS could substantially benefit E-Rate applicants, especially small school districts and libraries.³ The Bureau now seeks information on whether MIBS support has indeed provided applicants with substantial benefits, cost savings, or efficiencies.⁴ It goes without question that schools and libraries are responsible for managing staff and programs, while serving hundreds or thousands of students and patrons at

¹ The SHLB Coalition is a broad-based public interest organization consisting of over 300 members who share the goal of promoting open, affordable, high-quality broadband for anchor institutions and their communities.

² *Wireline Competition Bureau Seeks Comment on Proposed Eligible Services List for the E-Rate Program*, WC Docket No. 13-184, Public Notice, DA 25-921 (WCB Sept. 30, 2025) (Proposed ESL).

³ *Id.* at 2.

⁴ *Id.*

varying levels of support—often with limited capacity and resources. As such, SHLB members report that E-Rate support for MIBS services can provide efficient, cost-effective network management solutions for school and library applicants, especially for those that serve small to mid-size or rural communities. In fact, the majority of applications including MIBS services appear to be requested by small to mid-size applicants. For example, of the 2,415 schools/school districts that applied for MIBS funding in FY25, 2,248 serve less than 5,000 students. First, many smaller schools and libraries lack the dedicated IT staff or requisite skills and technical expertise to manage their broadband networks as effectively as their larger counterparts with more readily available resources, particularly as technologies evolve. MIBS support, which can include timely network refreshes and technology updates, assists applicants with some of the complexity of managing their technology, ensuring that E-Rate funded networks continue to function properly and reliably on an ongoing basis. Second, SHLB members have shared that MIBS support can help school and library applicants make better use of their budgets as they are able to outsource technology-related tasks to third-party experts. This reduces high, up-front costs of in-house technology needs, and it frees up staff to be focused on the business of running a school or library.

Third, many schools and libraries simply are unable to hire full-time staff for a variety of reasons, especially in rural areas. Schools and libraries may have tight budgets that limit hiring of additional IT resources. They may also need less than a full-time person to address their technology needs and using outside companies can provide the services needed without hiring an unnecessary full-time employee. Finally, schools and libraries may simply be unable to hire any internal staff because there are no candidates for the position.

Examples of how MIBS support has benefited school and library applicants include:

- The Washington State Library operates a consortium of primarily very small, single-site libraries in rural areas across the State. E-Rate funding helps provide much needed connectivity to these remote communities. Most of these libraries do not have dedicated IT staff and had outdated or low-capacity equipment and slow, unsecured, and unreliable internet connections. The consortium competitively bid a multi-year contract including MIBS services for the member libraries. The program provided 1G fiber Internet and ensures that high-capacity equipment is installed. More importantly, with MIBS services, the internal networks remain fully functional and reliable over time, even if the library staff on site do not have the skills to troubleshoot and maintain it. These changes have brought dramatic improvements to the services offered in these remote areas, where patrons are often unable to obtain reliable Internet from their homes. As a result, it has increased their ability to apply for jobs, to access medical care and social services, and to participate in the digital world. Without E-Rate funding, existing contracts would need to be terminated early and the program would be dismantled, leaving the libraries without a functioning internal network.
- In Indiana, there are 86 applicants currently using MIBS. The vast majority of those applicants are very small libraries and schools that do not have the technology staff required to keep a network running at a level that ensures that patrons and students can rely on adequate internet access on a daily basis. Rather, these applicants rely on operation and management support from trusted partners to make this valuable and vital access available. Without this service, a number of anchor institutions would not be able to support a wireless network in their facilities, which would only increase the lack of internet accessibility in their communities.
- In Oregon, a school district reported that it would not have been able to upgrade its networking infrastructure – that was end of life – without MIBS services. Without these eligible services, it would have had to divert budget from educational programs to fund essential infrastructure upgrades.
- In Ohio, approximately 55 percent of the state is agricultural, and roughly one-third of the state is considered Appalachian. Within its 88 counties, there are 609 public school districts and approximately 725 charter schools. Of the school districts, the majority are small, consisting of an average of four schools, and are located in rural areas or settings. Because it is a local control state, each district is responsible for procuring services to support its schools. For FY2025, there were 420 applicants utilizing MIBS. Approximately half of the applicants were small districts, with the remaining half being individual schools. The Ohio State E-Rate coordinator conducted a survey to determine the reason applicants in Ohio utilized MIBS. The survey found that 90 percent of the districts that responded employ approximately two individuals to support the technology district-wide. The majority of those individuals spent most of their time supporting end-user devices and lacked the technical knowledge to support the networks and Wi-Fi access. When asked what led their organization to utilize MIBS, 98 percent of survey respondents cited a lack of expertise. When asked, 100 percent of the respondents indicated they saw cost savings, with the average savings realized per district being \$81,000 per year.

Accordingly, SHLB members stress the positive and vital impact of MIBS support, especially for small to mid-size applicants that often serve rural communities, and urge the Commission to continue supporting MIBS as an eligible E-Rate service.

II. THE COMMISSION SHOULD SIMPLIFY THE APPLICATION PROCESS AND CONSIDER COMBINING SOME CATEGORY 2 SERVICES ON THE FORM 470.

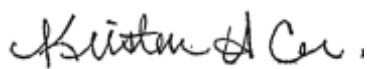
The Bureau asks how it can provide greater clarity in differentiating between MIBS and basic maintenance of internal connections (BMIC) services in the ESL. Specifically, it asks whether it should more narrowly define MIBS to alleviate any overlap with those services that qualify for BMIC.⁵ SHLB appreciates the Bureau's efforts to address possible confusion applicants face when determining the categorization and eligibility of equipment and services in their Form 470, especially when the wrong choice can result in an applicant being denied funding. While the Bureau's inquiry centers on which items should be included or excluded from the MIBS subcategory, we note that many applicants simply struggle to choose the correct category that most adequately reflects their needs. For example, they may select the BMIC subcategory on the Form 470, while their narrative describes needing MIBS services. In that scenario, a vendor is unable to bid on MIBS services as the applicant did not check the MIBS category on the form. Additionally, applicants, especially those without IT staff, often do not know details about the services required to manage and operate their own or leased broadband internal connections. This can lead to applicants completing the Form 470 and Form 471 process and not learning until PIA review, or in some cases invoice review, that the service they thought was MIBS (for example) was actually BMIC, internal connections, or completely ineligible.

Accordingly, if the Commission is exploring ways to alleviate applicant and vendor confusion, it should consider solutions that simplify the application process overall. For example,

⁵ *Proposed ESL* at 2.

we suggest that the Commission could consolidate the current three sub-categories (internal connections, BMIC, and MIBS) into a single category for requesting Category 2 services, or at least consolidate MIBS and BMIC into one category for purposes of the Form 470 and competitive bidding. We note that E-Rate training already encourages applicants to seek bids for multiple service types if they are unsure whether a piece of equipment or service falls under one of two service types.⁶ Combining some Category 2 services on the Form 470 would not only alleviate upfront confusion for applicants, it would also ensure that funding is provided for an applicant's intended needs without subjecting them to unnecessary administrative hurdles and post-commitment denials based on Form 470 dropdown errors.⁷ The Commission can retain the current Form 471, so that it can collect data with more specificity on what is being committed and funded.⁸ Additionally, an applicant who selects the wrong service type on the Form 471 can correct that description as a ministerial and clerical error, instead of having the entire application denied, which would happen if that mistake was made on the Form 470.

Respectfully submitted,



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⁶ USAC, E-Rate Pre-Commitment Process, slide 29 (Sept. 25, 2025), *available at* <https://www.usac.org/wp-content/uploads/e-rate/documents/Webinars/2025/E-Rate-Pre-Commitment-Process-FINAL.pdf>.

⁷ We note that applicants may have already begun competitive bidding for FY 2026, or are already under multi-year contracts for MIBS services. We therefore ask the Commission to provide sufficient advance notice and training opportunities to applicants for any changes made to future funding years.

⁸ If applicants are following USAC's guidance to select multiple subcategories on the Form 470, the Bureau is not collecting accurate granular data at the Form 470 level currently.