Federal Communications Commission
Washington, D.C. 20554

In the Matter Of	)	
	)	
Maximizing Efficiencies in Universal Service Administration	)	WC Docket No. 26-173
	)	
	)	

REPLY COMMENTS OF THE SCHOOLS, HEALTH & LIBRARIES BROADBAND (SHLB) COALITION AND THE AMERICAN LIBRARY ASSOCIATION

The Schools, Health & Libraries Broadband (SHLB) Coalition[1] and the American Library Association (ALA)[2] respectfully submit these reply comments in response to the Federal Communications Commission's (Commission) Notice of Proposed Rulemaking (NPRM) requesting comment on the administration of the Universal Service Fund (USF) and the Commission's oversight of the Universal Service Administrative Company (USAC).[3] We take this opportunity to reply directly to other comments filed, specifically regarding suggestions impacting the E-Rate and Rural Health Care (RHC) programs. In doing so, we continue to emphasize that any recommendation should ensure that Commission-led initiatives ultimately promote transparent, efficient, and streamlined administration of the USF programs.

[1] SHLB is a broad-based public interest coalition of more than 320 organizations that share the mission of promoting open, affordable, high-quality broadband for community anchor institutions, which are often supported by the USF.

[2] ALA is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. ALA represents the nation's 123,000 libraries, which includes 17,500 public libraries.

[3] *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, Notice of Proposed Rulemaking, FCC 26-52 (rel. Aug. 7, 2026) (*NPRM*).

EXECUTIVE SUMMARY

We appreciate the Commission's efforts to oversee and streamline the administration and implementation of the USF programs. SHLB and ALA filed comments earlier in this proceeding offering recommendations to enhance the transparency and efficiency of E-Rate and RHC program administration.[4] We are pleased that other commenters agree with many of our recommendations so that these programs remain accessible and efficient for the beneficiaries relying on their support.

In the following replies, we reaffirm our previous comments and provide additional recommendations that support the transparent and efficient administration of the E-Rate and RHC programs. Specifically, we offer the following recommendations:

- The Commission and USAC can take several measures to give applicants greater visibility into the status of pending decisions. This includes displaying enhanced status indicators for applications, communicating processing times for appeals and audits, and publishing written appeal decisions.

- Regarding audit procedures, the Commission should not adopt a pay-and-dispute model or enforce a recovery method relying on extrapolation. USAC and third-party auditors should receive adequate training.

- The Commission should promote efficient program administration via enhanced outreach and procedural transparency. This includes publishing guidance from training and events for program stakeholders; incorporating appeal outcomes into review procedures; publicly reporting metrics including turnaround times, responsiveness, and other audit-specific information; and establishing a neutral ombudsman position for the E-Rate and RHC programs.

- The Commission should maintain USAC Board input from a representative array of program stakeholders, as they offer impact-oriented expertise that creates value for program users. The Commission should also retain USAC's Board Programmatic Committees, as they are a vital link between USAC management and USF implementation.

[4] Comments of the Schools, Health & Libraries Broadband (SHLB) Coalition and the American Library Association (ALA), *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173 (filed Sep. 30, 2026) (*SHLB & ALA Comments*).

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I. APPLICANTS SHOULD HAVE INCREASED VISIBILITY INTO PENDING REVIEWS OF APPLICATIONS, APPEALS, AND AUDITS.

SHLB and ALA have been long-time advocates for streamlined administration of the E-Rate and RHC programs to minimize burdens for applicants, service providers, and USAC.[5] This includes ensuring that applicants have sufficient visibility into the status of pending funding requests and enhanced communication with USAC during application review. We are pleased that other commenters support measures that would increase transparency during application, appeal, and audit reviews, and we take this opportunity to highlight certain recommendations.

First, SHLB and ALA agree with commenters that filers should be able to easily determine the review status of their pending application forms. For example, the State E-Rate Coordinator's Alliance (SECA) suggests that the status of an applicant's pending forms should be added both to the E-Rate Productivity Center (EPC) portal and reported in Open Data.[6] The Michigan Statewide Educational Network (MiSEN) likewise supports enhanced visibility in

[5] *See, e.g.*, Comments of the Schools, Health & Libraries Broadband (SHLB) Coalition, *Schools and Libraries Universal Service Support Mechanism, Federal-State Joint Board on Universal Service, and Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, CC Docket Nos. 02-6, 96-45, 97-21 (filed Sep. 25, 2023); Comments of the American Library Association (ALA), *Schools and Libraries Universal Service Support Mechanism, Federal-State Joint Board on Universal Service, and Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, CC Docket Nos. 02-6, 96-45, 97-21 (filed Sep. 25, 2023); Comments of the Schools, Health & Libraries Broadband (SHLB) Coalition, *Delete, Delete, Delete*, GN Docket No. 25-133, *Schools and Libraries Universal Service Support Mechanism, Federal-State Joint Board on Universal Service, Changes to the Board of Directors of the Board of Directors of the National Exchange Carrier Association, Inc.*, CC Docket Nos. 02-6, 96-45, 97-21, *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket No. 13-184, *Promoting Telehealth in Rural America*, WC Docket No. 17-310, *Rural Health Care Support Mechanism*, WC Docket No. 02-60 (filed Apr. 11, 2025); Comments of the American Library Association (ALA), *Delete, Delete, Delete*, GN Docket No. 25-133 (filed Apr. 11, 2025).

[6] Comments of the State E-Rate Coordinators' Alliance (SECA), *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 7 (filed Sep. 30, 2026) (*SECA Comments*).

Open Data, stating that "[e]ach pending application should display its current review stage, such as initial review, awaiting applicant response, or final review, including how long each has been pending and the deadlines associated."[7] MiSEN further suggests that the Open Data tool should display the date when a review status last changed and note when an issue is waiting on further guidance from the Commission.[8]

SHLB and ALA previously shared in our initial comments that applicants often feel frustrated when they don't know the status of USAC's review of pending applications, which is exacerbated when reviews remain dormant for significant periods of time and the applicant lacks channels for meaningful communication with the USAC reviewer.[9] We agree that enhanced status indicators as suggested above would serve as a practical tool, both for applicants and USAC.[10] Enhanced status indicators would increase visibility throughout each step of the filing process on the front end, rather than placing the onus on applicants to initiate contact with USAC customer service for updates.[11] We also agree that enhanced status indicators would provide greater insight into whether USAC is meeting its own internal performance metrics tied to turnaround times and responsiveness.[12]

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[7] Comments of the Michigan Statewide Educational Network (MiSEN), *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 11 (filed Sep. 30, 2026) (*MiSEN Comments*).

[8] *Id.*

[9] *SHLB & ALA Comments* at 13–14.

[10] *MiSEN Comments* at 11.

[11] *Id.*

[12] *SECA Comments* at 7 ("The dashboard should indicate how long the request has been pending, so applicants can gauge whether USAC is meeting the performance metric.").

Accordingly, the Commission should direct USAC to add enhanced status indicators to Open Data, EPC, and RHC Connect (the RHC program equivalent to EPC) that reflect various data points, such as: date submitted; current review stage; date when a USAC reviewer last viewed the form; date when a review status last changed; and status of approval or denial. Additionally, certain status indicators should relay pertinent information so that applicants can better understand the data points. For example, if the system indicates that the review status has changed, it should explain what happened/what changed.[13] Furthermore, the system should indicate when an action is pending (whether on the applicant or USAC side); the deadlines associated with those actions; and if an issue is awaiting Commission-specific guidance. We also strongly recommend that indicators reflect the status of pending information requests, including the status of any action required by applicants and status of USAC review/follow-up. Ultimately, the goal is to use existing systems to create better datasets and communication channels to minimize the time applicants spend searching for answers from the USAC call center or helpdesk.

Second, SHLB and ALA support ways to increase transparency into the status of processing E-Rate and RHC program appeals and audits. We agree with CTIA's suggestion that "USAC should be required to publish data on its timelines for processing appeals."[14] While we understand that not all appeals necessitate equal processing times, we believe applicants would benefit from clearer communication about the process, especially when requests remain pending

[13] This could help an applicant discern if the action taken was procedural or more substantive.

[14] Comments of CTIA, *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 4 (filed Sep. 30, 2026).

for long periods of time. We likewise support similar reporting and increased communication about the audit review process.

Finally, we are pleased that other commenters agree that applicants would benefit from increased transparency concerning USAC appeal decisions. For example, MiSEN and NTCA suggest that written appeal decisions should be made publicly available.[15] SECA also supports including additional information in USAC appeal decisions to better help applicants understand related findings and decisions, including "citation to the Act, Commission rules, and/or Commission precedent."[16] These suggestions align with our initial comments, in which we expressed that it would benefit program participants to see 1) the types of issues and facts that are being appealed to USAC, so that they may better understand how to successfully navigate their own funding requests and appeal process, and 2) citations to the specific rules or orders used to decide that appeal, and an analysis of how those rules/orders apply to the specific facts and circumstances of the appeal.[17]

II. THE COMMISSION SHOULD CONSIDER VARIOUS CONCERNS AND RECOMMENDATIONS RAISED REGARDING THE AUDIT PROCESS.

A. The Commission's Proposed Pay and Dispute Model Would Increase Financial Burdens on Schools and Libraries.

The Commission seeks comment on the timing of recovery of funds in the E-Rate and RHC programs,[18] including a proposal that would require applicants and service providers to pay

[15] *MiSEN Comments* at 12; Comments of NTCA – The Rural Broadband Association (NTCA), *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 4 (filed Sep. 30, 2026).

[16] *SECA Comments* at 7.

[17] *SHLB & ALA Comments* at 12–13.

[18] *NPRM* at 12–13, paras. 33–35.

any alleged recovery after a finding by the Wireline Competition Bureau (Bureau) but before the filing of a petition for reconsideration by the Bureau or application for review by the full Commission.[19] In our initial comments, SHLB and ALA strongly urged the Commission to retain the current rule that allows timely appeals and judicial proceedings to stay the recovery process for USF program participants and to not adopt a "pay-and-dispute" approach for the E-Rate and RHC programs.[20]

Other respondents shared concerns about this potential rule change. As Funds for Learning, LLC (FFL) states:

> "E-Rate applicants are public school districts, charter schools, private schools, and libraries operating on appropriated or fixed annual budgets. A recovery demanded in the middle of a fiscal year comes out of classroom and library services in that year. A refund two years later, after an application for review is granted, does not restore the school year that was lost. Students and patrons bear the cost of paying first, and a later refund does not undo it."[21]

The Kentucky Department of Education shared similar concerns, stating that:

> "[R]equiring applicants to repay funds before appeals are resolved . . . . could create significant budgetary uncertainty for schools and libraries and discourage participation by applicants concerned about future financial exposure . . . . Schools and libraries should not be required to absorb potentially substantial financial obligations before the underlying dispute has been fully resolved."[22]

This problem is further compounded because these decisions can take years to resolve. As CTIA explains:

> "[The] Commission review of Bureau decisions are not subject to any specific timelines for action, and it is not uncommon for appeals to remain pending for

[19] *Id.* at 12, para. 34.

[20] *SHLB & ALA Comments* at 30.

[21] Comments of Funds For Learning, *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 8 (filed Sep. 30, 2026) (*FFL Comments*).

[22] Comments of the Kentucky Department of Education, *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 2 (filed Sep. 30, 2026) (*Kentucky Comments*).

> periods of years. A pay-and-dispute policy could have the perverse effect of exacerbating such delays by removing the incentive to resolve appeals to enable recovery of funds."[23]

SHLB and ALA likewise share these concerns. Our initial position thus remains unchanged, and we continue to ask the Commission not to adopt a "pay-and-dispute" approach for the E-Rate and RHC programs, as the Commission already has the ability to decide appeals sooner and recover any improperly disbursed funds. If the Commission moves forward with this rule change, the E-Rate and RHC programs should be exempt.

B. The Commission Should Support Adequate Training for USAC/Third-Party Auditors.

In the *NPRM*, the Commission asked whether USAC's auditors (including internal USAC staff or third-party contractors) receive adequate training and, if additional training of USAC auditors is necessary, what kind of additional training should be provided.[24] We reiterate our recommendation that USAC's auditors should receive adequate training in order to streamline the audit process for applicants,[25] and agree with WTA that "additional training of all auditors may be necessary to ensure consistency between the audit teams with regard to interpreting the Commission's rules and the guidance offered during audits."[26] Furthermore, we agree with NTCA's recommendation of "annual specialized training for USAC staff and third-party auditors, using published decisions and advisory materials to improve consistency,

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[23] *CTIA Comments* at 14.

[24] *NPRM* at 13, para. 38.

[25] *SHLB & ALA Comment*s at 33.

[26] Comments of WTA – Advocates for Rural Broadband, *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 7 (filed Sep. 30, 2026) (*WTA Comments*).

professionalism, and predictability across USF administration."[27] We also agree with CTIA's premise that "[r]igorous auditor training would be a worthwhile investment that would benefit USAC, the FCC, and USF program participants alike."[28] Finally, we continue to "suggest that the schools and libraries being audited be provided with a person in USAC's audit unit to contact when there are issues with the outside auditors."[29]

C. Enforcing a Recovery Method Relying on Extrapolation Could Harm Applicants.

In the *NPRM*, the Commission proposes to "modify section 54.707 of the Commission's rules governing audit controls to codify USAC's ability to calculate recoveries by extrapolating from a statistically representative sample of the auditee's disbursements rather than seeking recovery for only the violations identified in the sample."[30] Several respondents expressed concerns with this proposed rule change. SHLB and ALA share these concerns, and strongly urge the Commission not to adopt the use of extrapolation to calculate recoveries in the E-Rate and RHC programs.[31]

The Rural Wireless Association (RWA) worries that due to the size of the representative sample, it "could produce disproportionately large recovery demands that bear little relationship to the actual level of non-compliance. A single error in a small sample can be extrapolated to vastly overstate the scope of the compliance problem, resulting in recovery amounts that may

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[27] *NTCA Comments* at *i*, 17.

[28] *CTIA Comments* at 9.

[29] *SHLB & ALA Comments* at 33.

[30] *NPRM* at 11, para. 28.

[31] *Id.* at 10–11, paras. 27–28; *see also id.* Appendix B at 31.

exceed the carrier's total USF support."[32] Recovery methodologies relying on statistical extrapolation can also "produce disproportionately large recovery demands when extrapolated across large applications or consortium projects,"[33] as stated by the Kentucky Department of Education. They continue to say that "[l]arge applicants and consortiums may be particularly vulnerable because isolated findings could be amplified into substantial recovery claims despite otherwise compliant program participation."[34] Our members likewise expressed concerns about the validity of the data and how incorrect data can adversely affect the outcome. There was also concern that many applicants, especially smaller schools and libraries, lack the in-house expertise and skills to review and assess the outcome of a process that involves extrapolation.

III. THE COMMISSION SHOULD CONSIDER RECOMMENDATIONS TO ENSURE EFFICIENT AND STREAMLINED PROGRAM ADMINISTRATION.

A. USAC Should Publicly Publish Training Guidance Offered at Events and Conferences.

SHLB and ALA offered many recommendations about how USAC can improve program stakeholder outreach and transparency, including by enhancing in-person and virtual training opportunities.[35] Regarding training, FFL asks that when USAC staff present, train, or answer questions at hosted events such as regional and national conferences, gatherings, briefings, and webinars, the information shared at those events should also be made available to the entire applicant community by USAC.[36] Specifically, FFL states that

[32] Comments of the Rural Wireless Association, *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 6 (filed Sep. 30, 2026) (*RWA Comments*).

[33] *Kentucky Comments* at 2.

[34] *Id.*

[35] *SHLB & ALA Comments* at 16–18.

[36] *FFL Comments* at 18–19.

> "[p]rogram participants benefit every time, and FFL wants USAC doing more of that work, not less, particularly for the rural, tribal, and small applicants who have the fewest other sources of program guidance… Some of these sessions are open to everyone; others are open only to a hosting organization's members or a conference's registrants."[37]

It also states that "[i]n a program where every applicant competes for the same finite funds under the same rules and deadlines, access to the administrator's guidance should not depend on which organizations an applicant can afford to join or which conferences it can afford to attend."[38] SHLB and ALA agree with FFL's concerns and support efforts to ensure that USAC training and guidance offered at events is also made publicly available so that it can be shared with a wider audience.

FFL also encouraged the "Commission to invite USAC to establish regular open question-and-answer sessions on program administration, for example monthly, at no cost to attend and open to every program participant . . . . A standing forum of this kind would let USAC answer once, in public, the questions it now answers many times in private."[39] We agree that "USAC's willingness to answer questions is one of its strengths," and, like FFL, would like to see more opportunities and forums to bring questions to USAC.[40]

B. Appeal Outcomes Should Inform Future USAC Training and Review Procedures.

The Kentucky Department of Education raised the idea that "appeal outcomes should be systematically analyzed and incorporated into review procedures. When appeal decisions overturn denials based on recurring issues, those findings should inform future reviewer

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[37] *Id.*

[38] *Id.* at 19.

[39] *Id.* at 20.

[40] *Id.* at 19–20.

guidance and training to reduce unnecessary denials and repetitive appeals."[41] We agree with this request. Incorporating the outcome of an appeal back into the training process would better identify trends that can assist USAC reviewers and avoid unnecessary denials in the future.

C. The Commission Should Consider Publicly Reporting on Responsiveness and Turnaround Times for Application and Audit Reviews.

We reaffirm our support for the Commission's proposal to require USAC to publicly report turnaround times or other metrics regarding responsiveness. Public reporting would increase visibility into USAC's performance and add transparency around the decision-making process.[42]

As we initially stated, the Commission should report up-to-date and detailed information on turnaround times and responsiveness metrics.[43] We are pleased that other commenters requested comprehensive data on USAC's anticipated turnaround times and its direct responsiveness to applicants about pending review for things like application, PIA, invoice, and information request reviews.[44] For example, SECA notes that USAC public reports should "identify the number and types of pending requests in each category and the number of days the matter has been under review," as well as "how many of the pending days are attributable to USAC awaiting guidance and direction from the FCC."[45] This information would help program

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[41] *Kentucky Comments* at 1.

[42] *SHLB & ALA Comments* at 23–25.

[43] *Id.*

[44] *See, e.g.*, *SECA Comments* at 5–8; Comments of the South Dakota Department of Education, *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 2–3 (filed Sep. 30, 2026) (*South Dakota Comments*).

[45] *SECA Comments* at 5.

users better understand where their applications stand and when they can reasonably expect action.

Additionally, other commenters suggest public reporting on audit information, which we believe would also prove beneficial. For example, the Ad Hoc Broadband for Rural Health Group suggests that USAC should "report the number and age of audits exceeding the timeline in its quarterly filings, consistent with the proposed turnaround-time reporting."[46] CTIA likewise supports public reporting of audit data.[47] We agree that USAC reporting on audit-specific information like the number of audits and the dates they opened and closed would increase transparency and support better communication with applicants, considering that audits can vary considerably in scope and time allotted for review.

D. USAC Should Establish an Ombudsman Position for the E-Rate and RHC Programs.

In our initial comments, SHLB and ALA recommended that it would be beneficial for the Commission to establish a USAC ombudsman position for the E-Rate and RHC programs.[48] Specifically, we stated that the individual(s) in this role could serve as a neutral resource who reviews specific filing and/or application challenges or disputes and presents a recommended path toward resolution to the program participant and USAC staff.[49]

We are pleased that other commenters expressed support for an ombudsman position to better assist applicants. For example, SECA asked that the Commission appoint an ombudsman

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[46] Comments of the Ad Hoc Broadband for Rural Health Group, *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 16 (filed Sep. 30, 2026).

[47] *CTIA Comments* at 3–4.

[48] *SHLB & ALA Comments* at 16.

[49] *Id.*

to address status inquiries and other unique matters regarding applications and forms, especially Form 471, invoices, etc., that are dormant or that appear to be 'stuck.'[50] Specifically, they stated that "[t]he ombudsman should have the ability and authority to provide a substantive response that goes beyond a simple 'we are working on it' message."[51] They also request an ombudsman to assist in "resolving differing opinions between USAC and applicants before an applicant proceeds to the FCDL and appeal stages."[52] We agree with SECA's suggestions about how the ombudsman position could function, and would be pleased to offer additional feedback should the Commission decide to move forward with this proposal.

IV. EFFICIENT USAC ADMINISTRATION OF THE USF REQUIRES PROGRAM INPUT AT THE BOARD AND COMMITTEE LEVEL.

SHLB and ALA agree with commenters who urge the Commission to maintain positions on the USAC Board for USF experts, including those with experience of the E-Rate and RHC programs. Programmatic experience at the board level enables transparent and efficient USF administration. FFL notes that a "director who has never seen a Form 471, an invoice dispute, or a beneficiary audit cannot evaluate management's account of how those processes are performing."[53] We thus continue to reiterate our support that USAC's board members possess meaningful knowledge of and experience with the E-Rate and Rural Healthcare programs.

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[50] *SECA Comments* at 9.

[51] *Id.*

[52] *Id.*; *see also MiSEN Comments* at 9 ("The ombudsman should also be available to help resolve disagreements between an applicant and a reviewer before an FCDL issues, so issues that can be settled informally do not have to proceed to appeal.").

[53] *FFL Comments* at 17.

SHLB and ALA also agree with commenters who urge the Commission to maintain impact-oriented Board representation. Expert board members should continue to represent the USF program stakeholders and beneficiaries, including schools, libraries, rural health care providers, service providers, and Tribal communities. We agree with the South Dakota Department of Education's Comments, which support maintaining existing school and library representatives with programmatic and operational knowledge of the E-Rate program.[54] Relatedly, we note that the Native Claim Firm shares a concern as to whether the Commission intends to maintain Tribal representation in USAC governance.[55] SHLB and ALA reaffirm our support for maintaining Tribal representation on the USAC Board,[56] and we ask that the Commission support this position.

Furthermore, the Commission should not eliminate Board Programmatic Committees in favor of broad audit, risk, and governance structures. We agree with the Kentucky Department of Education that eliminating programmatic committees "risks further insulating decision-makers from applicants and reducing visibility into program-specific challenges."[57] FFL notes the particular importance of the Schools and Libraries Committee, given that "E-Rate is the largest of the four programs by number of participants, it has the most complex application and

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[54] *South Dakota Comments* at 4. Other commenters support this proposal as well. *See, e.g.*, *SECA Comments* at 10.

[55] The Native Claim Firm requests the Commission clarify "whether the planned elimination of the Schools and Libraries Committee removes the only current structural channel through which Tribal E-Rate applicant concerns are represented in USAC governance, given the Commission's existing Tribal consultation and outreach program for this same population." Comments of The Native Claim Firm, *Maximizing Efficiencies in Universal Service Administration*, WC Docket No. 26-173, 2 (filed Sep. 14, 2026) (*RWA Comments*).

[56] *SHLB & ALA Comments* at 39–41.

[57] *Kentucky Comments* at 3.

competitive bidding rules, and its participants are almost entirely public institutions with no other channel to the Board."[58] Board Programmatic Committees provide a vital link between USAC management and the four USF programs.

V. CONCLUSION

SHLB and ALA express their continued appreciation for the opportunity to offer various recommendations on USF administration, including proposals to streamline the E-Rate and RHC programs. These programs remain critical to our schools, libraries, and health care providers, and we look forward to working with the Commission on implementing many of our proposals.

Respectfully submitted,

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[58] *FFL Comments* at 17.

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October 30, 2026