



October 13, 2026

Brendan Carr, Chairman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: WC Docket Nos. 26-133, 13-184, 21-93, and 21-455 — Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking Concerning E-Rate

Dear Chairman Carr:

On behalf of the Association for Career and Technical Education (ACTE), the nation's largest not-for-profit association committed to the advancement of education that prepares youth and adults for career success, and Advance CTE, the nation's longest-standing not-for-profit representing State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education (CTE) across all 50 states and U.S. territories, we are writing in response to the Federal Communications Commission's (FCC) notice of proposed rulemaking (NPRM) and further notice of proposed rulemaking concerning the E-rate program.

While we applaud the FCC's commitment to ensuring that E-rate continues to benefit schools, our organizations are concerned that the FCC's recent proposal would sunset many important elements of this program and constrain it in ways that would reduce students and educators' access to internet services, particularly those in low-income communities; impose significant budgetary and operational burdens on schools and districts; and limit students' opportunities to develop workforce-ready technology and artificial intelligence (AI) skills.

Established in 1996 with strong bipartisan support, the E-rate program has provided thousands of schools with discounts on internet, broadband and network services and equipment, lowering the costs of these critical resources. Schools serving low-income communities, including rural communities, receive larger discounts, up to 90% of eligible costs, and all recipients of E-rate funding are subject to audits and oversight from the

FCC. Thirty years after its creation, the E-rate program supports over 54 million students¹ across 98% of the nation's counties² and 96% of public schools.³

CTE programs rely on internet and broadband services to connect students with tools and software used in industry as well as career exploration and planning tools, labor market information and work-based learning experiences. Furthermore, in addition to traditional high schools, dedicated [Area Technical Centers](#) and [other schools focusing on CTE](#) are eligible to receive E-rate support.

As more schools launch CTE programs in digital technology fields⁴ and the Trump Administration continues to prioritize the incorporation of AI and emerging technologies in [education](#) and [workforce training programs](#), E-rate funding remains central to ensuring that schools are able to maintain the network equipment and related technical infrastructure that connects students with digital instructional resources and industry technologies, including AI tools aligned with employer needs.

We provide additional perspectives to several questions posed by the FCC in this notice below.

Should E-rate funding and support be terminated, reduced or reoriented? Has E-rate fulfilled its mission?

In its proposal, the FCC asks if the E-rate program has fulfilled its mission as directed by Congress to address limited internet connectivity in schools and therefore should be reduced or eliminated. While access to high-speed internet has indeed grown, the evidence supports the continued need for the E-rate program.

Network equipment and infrastructure require *continuous* maintenance, modernization and scaling to keep up with advancements in educational and industry technology. Schools and districts leverage E-rate funds not only to establish internet connectivity but to also invest in technology infrastructure that many struggle significantly to maintain due to rising costs. Such investments remain vital—despite nearly universal access to the internet in schools, the majority of school districts reported internet outages and other related issues in the 2024-25 school year.⁵ E-rate recipients themselves also

¹ [The Universal Service Fund: How it Impacts the United States](#)

² [Protect E-Rate — What's at Stake for America's Schools & Libraries](#)

³ [Statement of Commissioner Olivia Trusty, FCC](#)

⁴ [EdWeek Releases Report on CTE and AI - ACTE Online](#)

⁵ [GAO-26-107970, K-12 EDUCATION: Facility Issues Led About One in Five Districts to Cancel School in 2024-25, Affecting 2 Million Students](#)

highlight the program as a resource they rely on to provide internet access and to upgrade and maintain equipment.⁶

Many CTE programs in particular rely on high-speed internet and broadband equipment across a [wide range of fields](#). These include programs preparing students for careers in IT, cybersecurity, and data analytics, as well as health care programs in which students [learn](#) how to treat different medical conditions through AI-powered equipment. In other fields, [students](#) use the same digital tools found in industry to collect and analyze soil samples and improve production and logistics processes.

CTE students also leverage AI and educational technology for more general use cases, including to explore careers, engage in simulated work-based learning experiences and access virtual CTE courses, particularly in rural, remote and low-income communities where access to CTE programs may be limited. In Tennessee, for example, Lenoir City Schools [relies on E-rate](#) to update its network infrastructure in order to support technologies used in CTE classrooms, such as engineering software and video production tools.

Previous reversals of E-rate-supported services have also led to significant consequences for students and schools. After the FCC [voted](#) to remove school bus Wi-Fi and hotspots from the E-rate program in 2025, schools in low-income communities [were forced to](#) terminate or scale down the services they provided students, many of whom did not have access to the internet at home. Conversely, the 2014 modernization and expansion of the E-rate program led to increased funding and support for Wi-Fi equipment in schools.⁷

While the academic literature on E-rate and broadband services in education is limited, studies have linked the program to strong academic outcomes. For example, one study found that E-rate funding in Texas is positively associated with high school graduation rates, standardized test scores and advanced course completion, including dual enrollment courses.⁸ Other evaluations have found that E-rate expands internet access among low-income students.⁹

Given this growing body of evidence, the FCC should maintain support for the program and expand funding opportunities and supports for schools and districts.

⁶ [2024 E-rate Trends Report](#)

⁷ [E-rate Modernization: Progress and the Road Ahead](#)

⁸ [Investigating the Academic Performance and Disciplinary Consequences of School District Internet Access Spending - Yixing Chen, Vikas Mittal, Shrihari \(Hari\) Sridhar, 2021](#)

⁹ [Government Internet Subsidies and Student Achievement | NBER](#)

What would be the implications of terminating or narrowing E-rate for schools and districts?

A majority of districts have indicated that the termination of E-rate would have catastrophic or major implications for their schools.¹⁰ These concerns largely center on the financial and operational strain that the loss of E-rate funding would create.

Without E-rate, schools would be forced to decide whether to reduce the internet services they offer or divert funding from other areas of their budget, potentially requiring them to strip other programs of their support or to seek additional revenue through local tax increases. Establishing internet connectivity is only the first step in providing students and educators with access to digital resources. The equipment and infrastructure supporting that connectivity requires regular maintenance and upgrades to ensure services remain reliable and up to date. E-rate provides schools with a critical lifeline by helping offset the cost of broadband services and easing pressure on already strained educational budgets.¹¹ Without this support, schools could be forced to continue using aging or failing equipment or redirect funding from other critical educational programs to maintain essential internet connectivity. These effects would also disproportionately affect schools and districts serving low-income communities, who are the primary recipients of E-rate funds.¹²

Furthermore, the consequences of losing E-rate could extend beyond student and educator needs and directly impact the essential daily operations of schools, including attendance, grading, payroll, security, communications and other administrative functions that rely on internet connectivity.

Should E-rate be limited geographically?

In its NPRM, the FCC asks whether the E-rate program should be restricted to schools in specific geographic contexts, such as rural communities or areas with only one internet provider. We recommend that the FCC does not restrict E-rate support to only these schools.

While continued broadband investments remain critical for rural and limited-provider communities, restricting funding to only schools in those areas would create significant burden for other high-need communities, particularly low-income communities in urban and suburban environments. Currently, the majority of E-rate funding has gone toward

¹⁰ [2025 State of EdTech District Leadership](#)

¹¹ [GAO-26-107970, K-12 EDUCATION: Facility Issues Led About One in Five Districts to Cancel School in 2024-25, Affecting 2 Million Students](#)

¹² [E-Rate FY2024: Systematic Study of Program Implementation and Outcomes](#)

schools in communities where many households lack access to the internet and large-screen devices such as laptops and tablets.¹³ Instead, the FCC should maintain the E-rate program's need-based focus and continue supporting schools and districts serving low-income students, which includes rural and limited-provider communities.

Should E-rate-funded networks be subject to additional requirements surrounding screentime and use?

We appreciate the FCC's commitment to protecting students and prioritizing strong outcomes in relation to internet use and technology. However, any additional requirements related to students' use of devices and screentime would create additional burden for schools and districts receiving E-rate support and would reduce state and local control over education—an aspect of the proposal which appears to be at odds with [other initiatives currently prioritized by the Trump Administration](#). Furthermore, many state and local governments [are already implementing](#) their own screentime regulations, and any additional requirements from the E-rate program would force schools to ensure compliance with potentially diverging requirements. [Recent guidance](#) from the Department of Education on educational technology also outlines the importance of local control and voice over technology policies and decisions.

Therefore, we recommend that the FCC avoid imposing additional stipulations regarding screentime use to the E-rate program and instead focus on developing voluntary frameworks and resources that align with existing state and local policy. In addition to screentime use, these tools could also cover other technology issues such as privacy concerns and student data protection.

We appreciate your time and consideration of our comments and recommendations. Should you have any questions or would like to discuss the issues raised in this letter further, please do not hesitate to contact ACTE's Chief Policy, Research and Content Officer Alisha Hyslop (ahyslop@acteonline.org) or Advance CTE's Federal Policy Advisor Steve Voytek (svoytek@careertech.org).

Sincerely,



LeAnn Curry



Kate Kreamer

¹³ Ibid.

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