

**STATEMENT OF  
COMMISSIONER ANNA M. GOMEZ**

Re: *Ensuring Children’s Safe Use of Screens and E-Rate-Funded Services; Modernizing the E-Rate Program for Schools and Libraries; Establishing the Emergency Connectivity Fund to Close the Homework Gap; Promoting Fair and Open Competitive Bidding in the E-Rate Program*, WC Docket Nos. 26-133, 13-184, 21-93, 21-455, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, (June 25, 2026).

For nearly thirty years, the Schools and Libraries Universal Service Fund Program (E-Rate) has stood as one of our country’s most successful and impactful education and digital literacy initiatives. By connecting schools and libraries across the nation, we have narrowed the digital divide, ensured that students have access to the communications services necessary to learn essential digital skills, and prepared them to participate fully in our modern economy. As the United States competes globally to lead in artificial intelligence (AI) and advanced technologies, the importance of E-Rate has never been greater.

Yet today’s item, which has been erroneously portrayed as an inquiry into screen time, ventures far beyond the Commission’s area of expertise. Beneath the stated concern about screen time lie speculative and unwarranted proposals, including whether the Commission should terminate E-Rate or dramatically limit its scope to be available only in rural areas or areas served by a single provider. These proposals reflect a fundamental misunderstanding of the challenges schools and libraries face today and reveal a striking cognitive dissonance at the core of this item.

Policymakers across the political spectrum, including leaders of this Administration, have identified national leadership in AI as an urgent priority.<sup>1</sup> The Department of Education has affirmed that learning how to use AI is essential to ensuring Americans are competitive in a rapidly evolving workforce and that students must be taught to use AI safely and effectively.<sup>2</sup>

Despite this, the proposals in today’s item move in the opposite direction. We cannot elevate national expectations for digital and AI literacy while simultaneously stripping away the digital tools required to meet them. We cannot declare that AI leadership is a national priority while questioning whether schools should continue to receive the connectivity required to teach it. And we cannot champion innovation while pulling the ladder out from under the students who will build America’s future technologies. This contradiction has a cost, and it will be paid by America’s children.

Ensuring connectivity in schools and libraries is not a one-time objective; it is a continuous, evolving responsibility. Educational technology advances rapidly. Bandwidth demands increase each year. New applications, including adaptive learning tools, online assessments, and AI-driven instruction, require robust, reliable networks.<sup>3</sup> Schools and libraries also face recurring operational costs, including monthly service charges, internal network modernization, cybersecurity, and building and safety systems.

Suggesting that recent broadband infrastructure investments justify narrowing or eliminating E-Rate misunderstands the landscape. In the era of AI-enabled education, the question is not whether

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<sup>1</sup> See President Trump’s Executive Order Advancing Artificial Intelligence Education for American Youth, [Executive Order 14277](#) (Apr. 23, 2025), Sec. 3. See also, e.g., Sorelle Friedler & Andrew D. Selbst, *5 points of bipartisan agreement on how to regulate AI* (Aug. 15, 2025), <https://www.brookings.edu/articles/five-points-of-bipartisan-agreement-on-how-to-regulate-ai/>.

<sup>2</sup> Department of Education, Final Priority and Definitions-Secretary’s Supplemental Priority and Definitions on Advancing Artificial Intelligence in Education, 34 Fed. Reg. 18775 (Apr. 13, 2026).

<sup>3</sup> See Michelle Du & Nicol Turner Lee, *Why AI readiness requires digital literacy and inclusion* (Sep. 19, 2025), <https://www.brookings.edu/articles/why-ai-readiness-requires-digital-literacy-and-inclusion/>.

schools and libraries still need connectivity, it is whether we will support them in keeping pace with the demands of digital learning.

The era of learning by quill and candlelight is long over. Gutting E-Rate would turn back the clock on American classrooms and leave our students behind peers in every developed and developing nation now investing in digital learning.

Parents, educators, librarians, pediatricians, and state and local leaders are appropriately engaged in addressing concerns about children's mental health, online safety, and healthy technology use. These issues are complex and require careful, ongoing research and collaboration.

No one is arguing that concerns over screen time are imaginary. Consideration for children's development, attention spans, and mental health is worth taking seriously. But those conversations belong in homes, classrooms, pediatricians' offices, and with state, local, and federal legislators. Policing children's behavior in schools goes far beyond our agency's stated mandate. The FCC is not the nation's parent. It is not the nation's teacher. And it is not the nation's school board.

The Communications Act charges the FCC with ensuring access to communications services to schools and libraries,<sup>4</sup> not with second-guessing how teachers use technology in their classrooms. The relationship between technology and learning is nuanced, frequently studied, and best evaluated by educators, families, health experts, and local communities. The Commission lacks both the statutory mandate and the requisite expertise to regulate such decisions.

Educational uses of technology should not be conflated with social media or entertainment.<sup>5</sup> Digital tools are now essential to learning, collaboration, skill-building, and preparation for participation in a technology-driven workforce.<sup>6</sup>

This item continues a troubling trend of narrowing programs that support the communities with the fewest resources. The children most harmed by any weakening of E-Rate are not those with multiple devices and high-speed broadband at home. They are the children who rely on schools and libraries for digital access, the students for whom E-Rate is a lifeline to opportunity.

E-Rate is the largest technology funding source for libraries and the third largest for education. Over ninety-seven percent of surveyed schools and libraries consider E-Rate funding essential to meeting connectivity needs.<sup>7</sup> Weakening this program would deepen educational inequities and move us further away from digital equity, not closer to it.

Congress established E-Rate to ensure communications access for schools and libraries in rural, urban, high-cost, and low-income areas.<sup>8</sup> Congress did not ask the FCC to revisit or narrow the scope of the program. Nor did Congress intend for federal connectivity support to hinge on anyone's preferred educational philosophy or screen-time preference. This notice of proposed rulemaking seeks to reverse thirty years of settled law.

Proposals to restrict E-Rate to only rural areas or areas with a single provider contradict clear statutory intent and ignore the realities of modern education.

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<sup>4</sup> 47 U.S.C. § 254.

<sup>5</sup> See Sved, Cooper, Consortium for School Networking, *Screens in Balance: Education, Technology, and Community Conversations* at 37 (2025), <https://www.cosn.org/wp-content/uploads/2025/09/2025-Blaschke-Report-Screens-in-Balance.pdf>.

<sup>6</sup> See *id.* at 18.

<sup>7</sup> Funds For Learning, LLC, *2025 E-rate Trends Report* at 15 (2025), <https://fundsforlearning.app.box.com/s/o845o2n4lih0k0zny6ydaf3x8q9rvaky>.

<sup>8</sup> 47 U.S.C. § 254(b)(3).

Digital literacy, AI literacy, broadband access, and equitable technology use are now fundamental to economic participation, civic engagement, and national competitiveness. Other countries are not debating whether their students should have access to digital tools, they are expanding those investments.<sup>9</sup> We cannot expect America to compete globally if we abandon the programs that make digital opportunity possible for every student.

Weakening E-Rate contradicts national priorities, undermines educational equity, and jeopardizes America's long-term competitiveness. This program should be strengthened, not hollowed out, so that every student in every community has the connectivity and digital skills needed to succeed in a world that will not wait for us to catch up.

I dissent from the Notice of Proposed Rulemaking and approve the Further Notice of Proposed Rulemaking.

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<sup>9</sup> Romina Bandura & Elena I. Méndez Leal, The Digital Literacy Imperative at 1 (2022), [https://csis-website-prod.s3.amazonaws.com/s3fs-public/publication/220718\\_Bandura\\_DigitalLiteracy\\_Imperative.pdf?VersionId=Kfakvovv6BncGYojmrowNFqG7KIH0fAP](https://csis-website-prod.s3.amazonaws.com/s3fs-public/publication/220718_Bandura_DigitalLiteracy_Imperative.pdf?VersionId=Kfakvovv6BncGYojmrowNFqG7KIH0fAP).