

**STATEMENT OF  
COMMISSIONER JESSICA ROSENWORCEL**

Re: *Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands, WT Docket No. 03-66 (Terminated); Transforming the 2.5 GHz Band, WT Docket No. 18-120*

Today we begin a rulemaking to release additional 2.5 GHz spectrum to the public, and in doing so, seek comment on how we can make more efficient and effective use of the airwaves reserved for the Educational Broadband Service. This is long overdue—and has my support.

The Educational Broadband Service has a long history. It got its start as a swath of spectrum known as Instructional Television Fixed Service, or ITFS. ITFS was first authorized back in 1963. The licenses were designed to assist educational institutions with delivering instructional television to schools and other higher learning facilities. A good idea, but many ITFS licensees had difficulty making full use of their spectrum and so the FCC permitted them to lease excess capacity for commercial use.

Fast forward to 2004. The FCC refreshed ITFS and renamed it the Educational Broadband Service. Moreover, there was an effort to reimagine the possibilities for these airwaves by encouraging their use not just for instructional television, but for educational broadband. Some promising efforts to ensure online access for students followed. But not every licensee was able to put this spectrum to the educational use the agency imagined.

This history is important. I believe it should inform our actions today. Because while we seek comment on how to increase flexibility for existing licensees, we must be mindful of the educational imperatives that have always informed their use. We need to be creative about how to pursue them in a modern and effective way.

Here's my idea.

Today, seven in ten teachers assign homework that requires access to broadband. But FCC data show that as many as one in three households do not subscribe to broadband service. Where these numbers overlap is what I call the Homework Gap.

According to the Senate Joint Economic Committee, the Homework Gap is real. By their count, it affects 12 million school-aged kids across the country. For students in households without broadband, getting homework done is hard. I've seen it firsthand in rural areas, urban areas, and everywhere in between. Kids sitting in parking lots late into the evening just to get a signal to do their nightly schoolwork. Students sliding into booths at fast food restaurants every afternoon to do their homework with fizzy drinks and fries. Parents cobbling together connectivity with trips to the homes of relatives and libraries with limited hours just to help their children get their assignments done.

It shouldn't be this hard. Today no child can be left offline. To have a fair shot at success, every student needs internet access, not only at school but also at home.

To tackle this challenge, we need some daring. We need to move past timid proposals that double down on the status quo. To this end, we need to use this proceeding to explore creative solutions. What if we repurposed the Educational Broadband Service through an incentive auction? What if we expanded the opportunities for spectrum use by auctioning not just licenses in inventory but through

overlay rights? Then what if we took the revenue from this effort and used it to support new initiatives to bridge the Homework Gap—to ensure every child has the internet access they need for schoolwork.

This could be a win for students and for wireless service. It could be a way to bridge the Homework Gap by honoring the history of the Educational Broadband Service but also bringing it firmly into the future.