



February 16, 2021

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
45 L Street NE,
Washington, DC 20554

Re: FCC WC Docket No. 21-31, Comments in Response to Petitions for Emergency Relief to Allow the Use of E-Rate Funds to Support Remote Learning During the COVID-19 Pandemic

Thank you for the opportunity to submit comments regarding the Federal Communications Commission's (FCC) proposed rule on the use of E-Rate funds to support remote learning during the pandemic, published in the Federal Register on February 12, 2021.

The National Council of Asian Pacific Americans (NCAPA) is a coalition of 37 national Asian American Pacific Islander (AAPI) organizations around the country. Based in Washington D.C., NCAPA serves to represent the interests of the greater AAPI communities, the fastest growing racial group in the nation, and to provide a national voice for Asian American and Native Hawaiian Pacific Islander issues.

NCAPA is also a member of the Asian American Tech Table, which was created to facilitate a more unified voice and presence in national tech and telecom policy debates. The Table, which is co-chaired by Asian Americans Advancing Justice (AAJC) and OCA – Asian Pacific American Advocates (OCA), convenes regularly with its members to discuss relevant policy concerns, while also engaging with industry and other stakeholders to raise the visibility of the AA and NHPI community.

NCAPA, AAJC, and OCA are supportive of the proposal to use E-Rate funding for remote learning during the COVID-19 pandemic to account for the closure of schools, libraries, and other educational facilities and assist teachers and students, especially those of color and from low-income backgrounds.

Despite surveys that portray Asian Americans as a highly connected group and a population that is relatively less impacted by the digital divide, most of these studies are conducted with English-speaking respondents and do not disaggregate their data or even conducted exclusively through online channels¹—belying the reality that many Southeast Asians, South Asians, Pacific Islanders, and other AAPIs with limited English proficiency (LEP) are more likely to face challenges getting connected.² Despite the lack of disaggregated data and research conducted offline and with LEP populations, digital divide indicators show disparities in access within AAPI communities. For example, studies indicated that up to 50% of some AAPI communities have limited English proficiency.³ Allocating E-Rate funds to support remote learning would therefore support low-income students and communities of color, including Asian Americans and Pacific Islanders.

In particular, there are rural areas of high-density AAPIs where students lack adequate access to engage in distance learning. These barriers are already resulting in lower engagement and attendance from students poorer learning outcomes in places like rural Hawaiian public schools.⁴ While the state is leading efforts to bridge the digital divide in Hawaii, there are still communities that do not have sufficient internet connectivity and more federal assistance is necessary to provide students with sufficient digital technology.⁵ Similarly, the American Pacific Islands of Guam, American Samoa, and the Northern

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Marianas Island have the most expensive Internet access in America—with prohibitively high costs for slow speeds, putting high-speed Internet out of reach for many, including students and teachers.⁶

Furthermore, there has already been a demonstrated need from AAPI students for the services that could be potentially subsidized by E-Rate funding. Last May, OCA provided laptops to over 100 students attending Asian American and Native American Pacific Islander-Serving Institutions to support remote learning during the pandemic. OCA's initial outreach identified nearly 4,000 AAPI students in need across 25 college campuses.⁷

Nearly one year into the shift to remote learning, there are likely many thousands, if not millions, more students who need services and devices that could be funded by the E-Rate program. Temporarily waiving restrictions for off-campus use of E-Rate supported equipment and services would greatly benefit students in continuing their education and teachers in supporting their pupils.

NCAPA, AAJC, and OCA agree with the petitioners that E-Rate funding should support wired or wireless network equipment including wireless hotspot devices, fixed or mobile wireless towers, modems, and routers. The FCC should also require that providers ensure connections are reliable, have faster speeds, and meet minimum technical requirements for students to adequately engage in all the components of distance learning including uploading, downloading, web-browsing, and video conferencing—even if several individuals of the household are using the connection at one time.⁸ We also believe that assistive technology for students with learning disabilities should also be considered necessary devices to support remote learning.

NCAPA, AAJC, and OCA also recommend that, if implemented, outreach and materials regarding E-Rate funding for remote learning is provided in multiple languages, including Asian and Pacific Islander languages.⁹ Outreach should also be conducted in partnership with trusted local organizations that can function as trusted messengers to reach populations that have been historically excluded but may need these services most. For example, if schools and libraries are permitted to extend their E-Rate funded broadband connectivity beyond school property or are permitted to purchase and distribute educational devices, then students, staff, and patrons must be informed of such changes and how to take advantage of these opportunities. In-language resources, messaging for trusted community organizations, and offline communications will facilitate getting the information and services to AAPI families with limited English proficiency who are less likely to be fully connected to the Internet and who would therefore benefit significantly from such funding.

Bridging the digital divide and homework gaps is crucial to ensuring that all students, including AAPI students, can succeed in their education in one of the most difficult and unusual times in recent memory to study and learn. For these reasons, NCAPA, AAJC, and OCA are in favor of expanding E-Rate funds to support remote learning during the COVID-19 pandemic and beyond. Access to reliable and fast broadband will continue to play an important role in determining the outcomes of students, and considering options like E-Rate funds to extend benefits to AAPIs and other communities of color will ensure that historically marginalized students are better equipped to succeed.

Sincerely,

National Council of Asian Pacific Americans
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¹ <https://www.pewresearch.org/fact-tank/2016/02/18/english-speaking-asian-americans-stand-out-for-their-technology-use/>

² <https://advancingjustice-aaic.org/sites/default/files/2020-02/Lifeline%20Backgrounder.pdf>

³ <https://aapidata.com/infographic-limited-english-2-2/>

⁴ <https://www.staradvertiser.com/2021/02/07/hawaii-news/dashboard-shows-how-hawaii-public-school-students-fared-last-semester/>

⁵ <https://www.khon2.com/local-news/gov-ige-pushes-for-more-investment-in-digital-technology/>

⁶ <https://slate.com/technology/2012/05/internet-access-and-cost-in-american-samoa-northern-marianas-islands-guam.html>

⁷ <https://www.ocanational.org/oca-provides-technology-to-students-during-covid19-pandemic>

⁸ <https://www.buzzfeednews.com/article/carolineodonovan/teenagers-take-on-comcast-internet-essentials>

⁹ We recommend looking to the COVID-19 Language Access Act for guidance on which languages should be included. <https://meng.house.gov/media-center/press-releases/meng-introduces-legislation-requiring-federal-government-agencies-to>