



Schools Beyond Screens and Fairplay Statement on the Federal Communications Commission's Notice of Proposed Rulemaking: "Ensuring Children's Safe Use of Screens and E-Rate-Funded Services"

Schools Beyond Screens and Fairplay thank the Federal Communications Commission (FCC) and National Telecommunications and Information Administration (NTIA) for their attention to the urgent issue of technology in schools. As organizations dedicated to reducing children's screen time, protecting kids' online safety and data privacy, and reorienting educational technology programs around demonstrably effective classroom uses, we urge the FCC not to reduce E-Rate funded services as a means of addressing excessive and harmful classroom screen use.

Our organizations are leaders in the national movement to create bell-to-bell phone-free school policies and distraction-free classrooms. Between our organizations, we have hundreds of local chapters and dozens of state teams representing thousands of parents. As steadfast advocates for reducing screen time in K-12 schools, we welcome FCC and NTIA coordination to support these efforts, without impacting E-Rate funding recipients' broadband access.

Schools Beyond Screens and Fairplay support intentional reforms to ensure educational technology is safe, effective, and compliant with federal and state law. This includes the Children's Internet Protection Act (CIPA) and other applicable privacy laws.

The FCC's [NPRM](#) asks: "We seek comment not only on how to ensure E-Rate-funded services are advancing educational outcomes and protecting children online, but also on whether the program should be narrowed, or otherwise reoriented to reflect the extent to which its connectivity objectives have been achieved."

Our coalition is advocating for the use of developmentally appropriate, independently vetted digital products that ensure positive academic outcomes. This absolutely requires reliable broadband connectivity.

We oppose any measures that would reduce, restructure, or condition E-Rate connectivity funding. Broadband access is a requirement that is separate from issues relating to educational technology content and applications, and is still essential for the high-quality technology use the NPRM says it wants to promote, and which we support.

Internet connection is critical, foundational infrastructure for schools. Connectivity is still an issue around the country, and many districts rely upon E-Rate resources. "74% of all districts are now meeting or exceeding the FCC's recommended bandwidth goal of 1 Mbps per student." ([Connect K-12 2023 Report](#), referenced in the FCC's own [2024 Section 706 Report](#)). This is an improvement from 2020, but significant gaps remain. Further, E-Rate funding does not subsidize student devices, or technology platforms.



If schools lose access to critical E-Rate funding, it is highly unlikely they will reduce or eliminate internet access. Teachers and administrators need internet access to perform essential job functions. We are concerned that any reduction in federal E-Rate subsidies will force districts to cut other programs to make up any budget deficit. As a result, the very programs that get children offline, including arts and sports programming, will be negatively impacted.

We are grateful to the NTIA for taking up the issue of excessive reliance on classroom technology, and for soliciting stakeholder feedback. However, we believe questions of how to safely and responsibly use digital products and set reasonable limits on screen use are best resolved at the state and local level.

The federal government can unblock states' progress in two key ways:

1. Parents need meaningful notification and the opportunity to consent or opt out of their children's data collection by technology companies. The Federal Trade Commission can issue clear COPPA guidance on parental notification and consent and parents' ability to opt out of technology platforms that are collecting our students' data.
2. Digital assessments are driving the use of 1:1 device programs across the country, sometimes as young as kindergarten or first grade. Daily device use at this age is not developmentally appropriate, yet is incentivized by the widespread adoption of computer-based assessments. The Department of Education can help resolve this by making it clear that computer-based assessments are not required and are not always the most developmentally appropriate option, and requiring states to offer paper-based assessments options to any family that requests it, regardless of a medical or disability exception.

We encourage NTIA to coordinate with its federal agency partners on these issues, and welcome the opportunity to engage with NTIA and the FCC on how the federal government can empower communities and school districts to reduce screen time and improve standards for digital products used in schools, without impacting essential broadband funding.