

**BEFORE THE
Federal Communications Commission
Washington, D.C.**

In the Matter of	)	
	)	
Ensuring Children’s Safe Use of Screens and E- Rate Funded Services	)	WC Docket No. 26-133
	)	
Modernizing the E-Rate Program for Schools and Libraries	)	WC Docket No. 13-184
	)	
Establishing the Emergency Connectivity Fund to Close the Homework Gap	)	WC Docket No. 21-93
	)	
Promoting Fair and Open Competition Bidding in the E-Rate Program	)	WC Docket No. 21-455
	)	

Comments of
Thomas A. Schatz
President
Citizens Against Government Waste
On
Further Notice of Proposed Rulemaking

October 9, 2026

Citizens Against Government Waste (CAGW) is a private, nonprofit, nonpartisan organization dedicated to educating the American public about waste, mismanagement, and inefficiency in government. On behalf of the more than one million members and supporters of CAGW, I commend the Federal Communications Commission (FCC) for its continued review of regulations under its Delete, Delete, Delete proceeding, and offer the following comments regarding the FCC’s Notice of Proposed Rulemaking (NPRM) and Further Notice of Proposed Rulemaking (FNPRM) in the matter of Ensuring Children’s Safe Use of Screens and E-Rate Funded Services (WC Docket No. 26-133); Modernizing the E-Rate Program for Schools and Libraries (WC Docket No. 13-184); Establishing the Emergency Connectivity Fund to Close the

Homework Gap (WC Docket No. 21-93; and, Promoting Fair and Open Competitive Bidding in the E-Rate Program (WC Docket No. 21-455)).¹

The E-Rate program is one of four programs that receive funding through the Universal Service Fund (USF). It supports communications services, including broadband connectivity for schools and libraries. During the Delete, Delete, Delete proceeding (GN Docket No. 25-133), CAGW raised concerns in its comments about the use of E-Rate subsidies to provide Wi-Fi hotspots in school buses and other off-campus locations. CAGW noted that the cost to equip a school bus with Wi-Fi hardware, licensing, and maintenance can cost between \$2,500 and \$4,000 per bus with \$400 to \$600 annually to provide mobile broadband services, which would be a waste of taxpayer resources.² CAGW urged the FCC to rescind FCC Rule 24-76, the Report and Order and Further Notice of Proposed Rulemaking in the Matter of Addressing the Homework Gap through the E-Rate Program (WC Docket No. 24-31), which the agency adopted on July 18, 2024.³ This rule permitted E-Rate funding to be used to install Wi-Fi hardware in school buses. The agency rescinded this ruling on September 30, 2025, through a Declaratory Ruling.⁴

Reforming the E-Rate program has been on the FCC's radar since 2013, when Commissioners Ajit Pai and Jessica Rosenworcel laid out separate reform proposals. Commissioner Rosenworcel sought to root out wasteful spending in the program, and Commissioner Pai recommended reducing bureaucratic red tape, and ensuring the funding is directed to where it is needed most.⁵ The NPRM and FNPRM are a continuation of this effort.

¹ Federal Communications Commission (FCC), "Notice of Proposed Rulemaking (NPRM) and Further Notice of Proposed Rulemaking (FNPRM) in the Matter of Ensuring Children's Safe Use of Screens and E-Rate Funded Services (WC Docket No. 26-133); Modernizing the E-Rate Program for Schools and Libraries (WC Docket No. 13-184); Establishing the Emergency Connectivity Fund to Close the Homework Gap (WC Docket No. 21-93; and, Promoting Fair and Open Competitive Bidding in the E-Rate Program (WC Docket No. 21-455)," Adopted June 25, 2026, <https://docs.fcc.gov/public/attachments/FCC-26-41A1.pdf>.

² Citizens Against Government Waste (CAGW), "CAGW Files Comments with FCC on Delete, Delete, Delete Proceeding," April 11, 2025, https://www.cagw.org/agency_comments/cagw-files-comments-fcc-delete-delete-delete-proceeding/.

³ FCC, "In the Matter of Addressing the Homework Gap through the E-Rate Program (WC Docket No. 21-31)," Adopted July 18, 2024, <https://docs.fcc.gov/public/attachments/FCC-24-76A1.pdf>.

⁴ FCC, "In the Matter of Modernizing the E-Rate Program for Schools and Libraries (WC Docket No. 13-184), Declaratory Ruling," Adopted September 30, 2025, <https://docs.fcc.gov/public/attachments/FCC-25-63A1.pdf>.

⁵ Deborah Collier, "E-Rate Program Reform To Take Center Stage," CAGW, July 18, 2013, <https://www.cagw.org/e-rate-program-reform-to-take-center-stage-at-fcc/>.

The 2021 Infrastructure Investment and Jobs Act provided \$42.45 billion for the Broadband Equity, Access, and Deployment (BEAD) program, managed by the National Telecommunications and Information Administration (NTIA). NTIA is currently issuing funding to states to assist in deploying broadband to unserved and underserved communities across the country.

A September 9, 2026, blog post published by the Advanced Communications Law and Policy Institute of the New York Law School noted that the number of locations eligible for BEAD fell by 69 percent since it was originally allocated. This is due to both private sector investment and other federal broadband programs deploying broadband during the time that it has taken for BEAD funds to be allocated, leading to fewer unserved and underserved locations, including communities with schools and libraries.⁶

Therefore, CAGW requests that the FCC evaluate broadband connectivity to schools and libraries based on whether these locations will be included in broadband buildout through BEAD of other federal programs, and if these locations now have or expect to have service provided by private sector broadband providers.

The FCC should continue its efforts to eliminate duplication of broadband services that are provided by other federal funding opportunities and private sector investment. Such duplication and overlap is a waste of taxpayer resources that could be used to increase broadband connections in unserved and underserved communities and help to reduce the USF's contribution factor, which reached all-time high of 42 percent for the fourth quarter of 2026, 14 percent greater than the top federal income tax marginal rate of 37 percent.⁷

Again, I appreciate the opportunity to provide comments in this proceeding on behalf of CAGW.

⁶ Deborah Collier, "Investments Reduces the Number of Eligible BEAD Locations," CAGW, September 24, 2026, <https://www.cagw.org/investment-reduces-the-number-of-eligible-bead-locations/>.

⁷ FCC, "Proposed Fourth Quarter 2026 Universal Service Contribution Factor," (CC Docket No. 96-45)," September 14, 2026, <https://docs.fcc.gov/public/attachments/DA-26-946A1.pdf>.