



September 20, 2022

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Re: *WC Docket No. 13-184*

Dear Ms. Dortch:

SpaceX supports the Commission's efforts to enable funding for the Schools and Libraries Universal Service Support Mechanism (more commonly known as the "E-Rate program") and connect millions of students in the United States whose broadband internet needs are still unmet.¹ SpaceX is committed to ensuring access to high-speed, low-latency broadband service to benefit American students as quickly as possible, not only at home but on their way to and from school. In fact, SpaceX has prioritized connecting otherwise unserved schools and libraries in the most remote parts of the country, including on Tribal lands. SpaceX therefore strongly agrees with Chairwoman Rosenworcel that providing Wi-Fi on school buses is critical to bridging the Homework Gap and that the provision of such services should be eligible for E-Rate support.² The Commission should quickly act to expand the scope of the E-Rate program by adopting the Chairwoman's draft Declaratory Ruling to ensure equitable access to high-speed broadband services on school buses in addition to the already eligible schools and libraries.

In compliance with the American Rescue Plan Act, the Commission adopted the Emergency Connectivity Fund in 2021.³ This fund supports services and educational scenarios beyond the traditional E-Rate program, including funding for broadband services on buses that transport students to and from eligible schools.⁴ As this program winds down, these critical services for students are now at risk. Providing new funding for these mobile services is of utmost importance, since in many cases, these students lack any high-throughput, low-latency option, not only during their commute to school, but also at home.⁵ Recent estimates showed that about 17 million students in the United States do not have access to internet at home.⁶ Low-income students are affected disproportionately; according to a Pew Research Center Study roughly one-third (35%) of households with children ages 6 to 17 and an annual income below \$30,000 a year do

¹ See Press Release, FCC, Chairwoman Rosenworcel Circulates Ruling Making Wi-Fi on School Buses Eligible for E-Rate Support (May 11, 2022) (*Chairwoman Rosenworcel Press Release*).

² See *Id.*

³ See *Establishing the Emergency Connectivity Fund to Close the Homework Gap*, WC Docket No. 21-93, Report and Order, 36 FCC Rcd 8696 (2021) (Emergency Connectivity Fund Report and Order).

⁴ See *Chairwoman Rosenworcel Press Release*.

⁵ See *Chairwoman Rosenworcel Press Release*.

⁶ See *Id.*

not have a high-speed internet connection at home.⁷ And many students who need the most support live miles from school, with lengthy commutes but no connectivity. Subsidized funding such as the E-Rate program should address digital equity and enable increased educational opportunities for students across the United States by ensuring access to high-speed internet at home *and* on the way to school.

No service is better situated to better close this overlooked part of the Homework Gap than Starlink, which can deliver high-speed, low-latency broadband at reasonable costs even in the most remote parts of the country, including Polar Regions of the country, that are too often left behind. SpaceX is committed to rapidly developing systems, services and products that can help close the connectivity gap that students are experiencing each day on their long commutes. Over the last two years, SpaceX has deployed over 3,000 satellites, and most recently, SpaceX has developed a high-performance dish that enables SpaceX to provide mobile services.⁸ Now, in collaboration with school districts, SpaceX is piloting projects in rural areas of the country to support students travelling on long bus routes with the goal of turning “ride time to connected time.”⁹ The bus routes are more than 60 minutes each way and are predominantly inaccessible to other mobile broadband services. Moreover, the overwhelming majority of the participating students will not have access to high-speed broadband at home. Connecting school buses will afford students the ability to optimize their commute time for necessary educational internet use, as well as time spent with family and friends or recreational activities.

Providing funding to access these services will benefit students in the United States at home *and* en route – especially in those areas underserved or entirely unserved by terrestrial alternatives. SpaceX therefore urges the Commission to adopt the Chairwoman’s draft Declaratory Ruling and swiftly make the necessary changes to the Eligible Services List to include services and equipment like SpaceX’s mobile antennas that can immediately provide Wi-Fi on school buses.

Sincerely,

/s/ David Goldman

David Goldman
Sr. Director, Satellite Policy

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⁷ See Auxier, B., & Anderson, M, *As schools close due to the coronavirus, some U.S. students face a digital 'homework gap'*, Pew Research Center (July 27, 2020), <https://www.pewresearch.org/fact-tank/2020/03/16/as-schools-close-due-to-the-coronavirus-some-u-s-students-face-a-digital-homework-gap/>

⁸ See *In the Matters of SpaceX Services, Inc. et al; Application for Blanket Authorization of Ku-Band Earth Stations on Vessels*, Order and Authorization, DA 22-695 (rel. June 30, 2022).

⁹ See *Chairwoman Rosenworcel Press Release*.

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