



February 10, 2021

Commission's Secretary
Office of the Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Re: Docket WC Docket No. 20-445

To Whom It May Concern:

On behalf of Higher Learning Advocates, a nonprofit organization that supports and advances policy changes to support a system of higher learning that is student-centered, equitable, outcomes-based, and focused on educational quality, I am writing to comment on the notice seeking public reply comments on the implementation of the Emergency Broadband Benefit (EBB).

It remains critical that students who have received a Pell Grant are eligible for the EBB and can quickly and efficiently sign up to begin receiving the benefit. Postsecondary students continue to face connectivity challenges in the switch to distance learning as the coronavirus pandemic continues and students struggle to complete their degree or credential. Further, Pell recipients complete at lower rates than non-Pell recipients and face additional financial barriers to postsecondary success, even before the pandemic and widespread online learning. Ensuring Pell students can receive assistance in the form of the EBB is paramount to their success.

Computer Matching Agreement and Alternative Means of Verification

Higher Learning Advocates reiterates its belief that the Federal Communications Commission (FCC) should expeditiously pursue a computer matching agreement with the U.S. Department of Education (ED) to verify Pell Grant receipt for the purposes of streamlining verification for the EBB. A computer matching agreement would maximize participation from eligible Pell Grant students while ensuring the financial integrity of the EBB program.

Absent a computer matching agreement, students who are eligible for the EBB because they received a Pell Grant should be able to verify eligibility in the following ways:

- 1) Written or electronic confirmation from a student's Institution of Higher Education (IHE) that the student has received a Pell Grant for the current award year;
- 2) A student's official financial aid award letter documenting the amount of a student's Pell Grant award received for the current year;
- 3) A copy of a paid invoice from a student that clearly documents the student's receipt of a Pell Grant during the current award year; or
- 4) A copy of a student's Student Aid Report that clearly documents the student's receipt of a Pell Grant during the current award year.

Numerous other concerned organizations have expressed support for a computer matching agreement between FCC and ED and for the menu of verification options listed above for purposes of verifying Pell status to participate in the EBB. These organizations include higher education experts and advocates such as the National College Attainment Network (NCAN), the Institute for Higher Education Policy (IHEP), New America's Higher Education Program, Breakthrough Central Texas, and uAspire, as well as public interest group Public Knowledge and New America's Open Technology Institute.

Further, associations comprised of college students themselves also echoed support, including LeadMN and the University of California Student Association. These student groups stressed the need for college students to be "supported with high quality and affordable internet and connected devices" as they have been required to shift to online learning environments.¹ Ensuring Pell recipients can receive the EBB is paramount because, as LeadMN notes, "if students are struggling to afford even basic necessities, reliable internet – a critical need for postsecondary education right now – will be even more difficult than ever to afford."²

Additional Flexibility, Good Faith Documentation, and Self-Certification

Higher Learning Advocates also believes that recommendations issued by internet service providers such as Verizon and T-Mobile for further flexibility in determining EBB eligibility.³ As our collective main goal is clear and uncomplicated verification, options that allow for rapid and appropriate delivery are important to consider. HLA echoes T-Mobile's call for good faith documentation to provide a means to verification. A process of good faith documentation of Pell eligibility would provide "a reliable and efficient way" to determine which students are eligible for the EBB.⁴

HLA believes that Verizon's recommendation to allow households with members enrolled in the free or reduced price school lunch program to self-certify should also be extended to Pell Grant recipients "given the emergency nature of the EBB Program [and] the importance of providing broadband access for remote learning."⁵ Such self-certification would mean that all students would have a more seamless process to receiving the EBB, and therefore a greater chance at success of not only enrolling students in the program and working toward closing the digital divide in K12 and postsecondary education.

Outreach and Awareness for Postsecondary Students Eligible for the EBB

Higher Learning Advocates also supports numerous comments advocating for state and community partnerships to promote the EBB to eligible students and populations.⁶ The FCC should produce and disseminate outreach materials in multiple languages and work with postsecondary institutions, particularly Historically Black College and Universities (HBCUs),

¹ *Comments of University of California Student Association*, filed Jan. 25, 2021.

² *Comments of LeadMN*, filed Jan. 25, 2021.

³ *Comments of T-Mobile USA, Inc.*, filed Jan. 25, 2021. *Ex parte of Verizon*, filed Feb. 1, 2021.

⁴ *Comments of T-Mobile USA, Inc.*, filed Jan. 25, 2021.

⁵ *Comments of Verizon*, filed Jan. 25, 2021.

⁶ *E.g. Comments from Public Knowledge and Next Century Cities.*

Minority Serving Institutions (MSIs), and Tribal Colleges and Universities (TCUs), to make Pell recipients aware of their eligibility for the EBB, provide them with information on how to sign up and explain what documentation is required.

In closing, Higher Learning Advocates remains poised to assist FCC in successful implementation of the EBB that includes clear and flexible directions for how students who receive a Pell Grant can verify their eligibility for the benefit and successfully enroll in the program. Thank you for the opportunity to comment.

Sincerely,

Julie Peller

Executive Director