Virginia Association of School Superintendents
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Federal Communications Commission 45 L Street NE Washington, DC 20554

RE: WC Docket Nos. 26-133, 13-184, 21-93, and 21-455 — Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking Concerning E-Rate

October 2, 2026

Dear Chairman Carr:

On behalf of Virginia's school divisions, we write to urge the Federal Communications Commission to support the federal E-Rate program, which makes telecommunications, internet access, and internal connections more affordable for schools and libraries through the Universal Service Fund. For school divisions across the Commonwealth, E-Rate is not a convenience; it is essential infrastructure that keeps classrooms, school offices, transportation systems, safety communications, assessments, digital curricula, and family engagement connected every day.

E-Rate is the only federal education technology program and one of the five largest streams of federal funding in the nation's schools, supporting connectivity for more than 100,000 schools and 11,000 libraries each year. That support is especially important in Virginia, where school divisions serve communities that vary widely in geography, local tax capacity, broadband availability, and student need. E-Rate helps ensure that the vast majority of the 132 school divisions serving rural, suburban, and urban students alike can rely on the connected learning environments that modern instruction requires.

It is important to remember that the FCC established E-Rate as a connectivity program and should review it within the scope of its statutory authority. E-Rate was created with the specific purpose of ensuring schools and libraries have access to affordable, reliable broadband connectivity. It was never intended to evaluate or direct educational programming, classroom instruction, or technology use, Decisions regarding how connectivity is used must remain in state and local education leaders purview (not FCC). Nationally, AASA reports $13.2 billion in E-Rate funding committed over the past five years, or roughly $2.6 billion each year. It is estimated that Virginia's funding for FY2026 will be $245 million.

We therefore respectfully urge the Commission to:

· Reject any proposal to sunset or eliminate the E-Rate program;

· Reject proposals that would unnecessarily narrow E-Rate eligibility or restrict support based solely on geography or other criteria that would leave students without adequate support;

· Preserve support for the connectivity and internal network infrastructure schools need to provide reliable educational access; and

· Work with schools and other stakeholders to strengthen and modernize E-Rate rather than reduce its role in public education.

Thus, we respectfully urge you to protect and strengthen E-Rate and maintain local flexibility so school divisions can meet today's connectivity needs. Virginia's students should not lose access to essential digital learning opportunities because of where they live or the fiscal capacity of their local community. E-Rate is a proven, bipartisan investment in educational equity, school operations, and student success, and it remains vital to school divisions across Virginia.

Sincerely,

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