



Brendan Carr, Chairman
Anna Gomez, Commissioner
Olivia Trusty, Commissioner

RE: Docket Numbers 26-133 and 13-184

Wednesday, September 16, 2026

To the Honorable Chairman and Commissioners,

My name is Mark Raymond, and I serve as Connecticut's Chief Information Officer and Chair of the Connecticut Commission for Educational Technology. Our Commission serves as the chief policy advisor on matters concerning educational technology in Connecticut and has long advocated for access to digital tools and connectivity to maximize educational opportunities for students. I am writing to address some of the elements of the Notice of Proposed Rulemaking (NPRM) adopted June 25, which addresses FCC dockets 26-133 (Ensuring Children's Safe Use of Screens and E-Rate-Funded Services) and 13-184 (Modernizing the E-Rate Program for Schools and Libraries).

Accessibility and Affordability

The state of broadband availability and affordability in Connecticut provides important context for several questions in the NPRM, including the following:

- Has the E-Rate program fulfilled Congress's objective of ensuring access to advanced telecommunications services?
- Is continued E-Rate funding consistent with Congress's original objective?
- Has Congress's directive under Section 254(h) been satisfied?
- Should E-Rate be limited or sunset because connectivity is now widespread?

Key is the relationship between access and affordability. Prior to any federal relief investments to expand broadband (e.g., ARPA, BEAD), Connecticut had 99%+ availability by household¹. We recognize this exceptional level of access. However, an estimated 10 – 14% of Connecticut households do not have a broadband

¹ See Connecticut's Broadband Mapping Hub, <https://BroadbandMaps.CT.gov>.



connection², primarily because of the high cost of service. The highest rates of disconnection are in communities with the lowest socioeconomic standing. Broadband is not truly “accessible” unless it is affordable.

For schools and libraries, Connecticut achieved nearly 100% fiber broadband availability in 2005 through the Connecticut Education Network (CEN), a research and education network (REN) operating on a cost-recovery basis. Like households, educational institutions face rising operational costs and depend on the Universal Service Fund’s E-Rate program. One-quarter of all Connecticut residents live in cities or towns defined as “distressed³,” and 22 percent of Connecticut students attend school in these communities⁴. Over the last four years of complete filing data, Connecticut libraries have received \$2M+ and our schools \$73M+ through the E-Rate program. Demand remains strong for funding, with requests representing 114% and 121%, respectively, of actual disbursements⁵. E-Rate funding is clearly necessary in Connecticut, with demand far exceeding supply.

Returning to the above questions in the NPRM, there continues to be a significant need for the E-Rate program, given demand from schools and libraries to make broadband accessible not just in terms of physical circuits and Wi-Fi networks, but also accessible from a cost perspective. For that reason, Congress designed the E-Rate program’s reimbursement formula⁶ to support schools and libraries in the most socioeconomically challenged communities. Those same cities and towns would be

² Governor Lamont: Connecticut’s 2024 Broadband Report Highlights Major Advancements in Digital Connectivity and Equity (<https://portal.ct.gov/governor/news/press-releases/2024/12-2024/governor-lamont-2024-broadband-report>); John B. Horrigan, *The Digital Divide in Connecticut: How Digital Exclusion Falls Hardest on Low-Income Households in Cities, Older Adults, Communities of Color, and Students* (Dalio Education, September 2020), https://www.dalioeducation.org/Customer-Content/www/CMS/files/DigitalDivide_Report_2020_Final.pdf.

³ Data retrieved August 27, 2026 from Connecticut Department of Economic and Community Development, https://portal.ct.gov/decd/content/about_decd/research-and-publications/02_review_publications/distressed-municipalities; U.S. Census Bureau, “QuickFacts: Connecticut Cities and Towns,” population estimates as of July 1, 2025, accessed August 27, 2026, <https://www.census.gov/quickfacts/>.

⁴ Data retrieved August 27, 2026 from Connecticut Department of Education, <https://public-edsight.ct.gov/students/enrollment-dashboard>.

⁵ Data retrieved June 22, 2026 from the USAC portal, <https://datahub.usac.org/stories/s/E-Rate-Search-Commitments-Tool/jj4v-cm5x/>.

⁶ 47 CFR § 254(h), accessed June 24, 2026 from <https://www.govinfo.gov/content/pkg/USCODE-2019-title47/html/USCODE-2019-title47-chap5-subchapII-partII-sec254.htm>.



hardest hit by the elimination or scaling back of E-Rate reimbursements, likely widening disparities in opportunity for students in poor communities.

Why Broadband Matters

Prior to the expansion of technology access through pandemic relief programs, Connecticut already saw nearly 100% 1:1 computer programs in its middle and high schools⁷. Access to broadband and computers remains essential to support core educational activities:

- Administer mandated student achievement assessments
- Provide high-quality instructional materials⁸
- Expand learning opportunities by offering courses not offered in local school districts⁹
- Increase flexibility in credit accumulation to increase graduation rates¹⁰

Perhaps most importantly, the effective use of technology remains an essential skill as all states prepare learners for lifetime learning, careers, and citizenry. We commend the Administration for prioritizing mastery of emerging technologies such as artificial intelligence (AI) to support these goals¹¹. Making broadband unaffordable — and so unavailable — by reducing or eliminating E-Rate funding would undermine these goals.

Questions of Screen Time

⁷ Based on responses from public school districts to a statewide survey, with results shared in detail in the publication, “2021 K – 12 Technology Staffing: Results from Statewide Survey of K – 12 Technology Leaders,” Connecticut Commission for Educational Technology (<https://portal.ct.gov/das/commission-for-educational-technology-overview/publications>).

⁸ In 2025 alone, more than 46,331 educators accessed free and open curriculum materials through Connecticut’s open education site, www.GoOpenCT.org (see Commission’s 2025 Annual Report at <https://portal.ct.gov/das/commission-for-educational-technology-overview/publications>).

⁹ An estimated 85% of Connecticut schools leverage online courseware to expand access to classes they cannot staff locally, and to enable credit recovery and accumulation that help students graduate on time (see Commission report, “Online Courseware: Survey Results, Expert Interviews, and Analysis” at <https://portal.ct.gov/das/commission-for-educational-technology-overview/publications>).

¹⁰ Ibid.

¹¹ For example, “Winning the Race: America’s AI Action Plan” (<https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf>); US Department of Labor AI Literacy Framework (<https://www.dol.gov/newsroom/releases/eta/eta20260213>), etc.



The NPRM raises important questions regarding the use of technology for learning:

- How can schools and libraries ensure E-Rate services are used for educational purposes?
- What measures are schools and libraries currently taking to limit screen time?
- Are schools already assessing screen time?
- Could excessive screen time itself be deemed inappropriate for minors?

Education leaders and parent groups have addressed the appropriate use of technology in learning for years. Most recently, the US Department of Education and the Connecticut Department of Education have issued guidance advising local education agencies to address these concerns. Both sets of guidance call for intentional use of technology for learning as the common goal of these tools, rather than imposing arbitrary “screen time” limits that do not correlate with student learning¹². The Commission has issued competency standards that help students and teachers develop digital, media, and AI literacies¹³. Those essential skills call for the effective, not excessive, use of devices, both school-issued and personal. They also call for teacher professional development, guiding them in how to use and model technology effectively. As guides, these standards provide the right foundation for policy and practice decisions on technology use at the local level. Imposing arbitrary screen time limits ignores the vast uses of digital tools, such as those mentioned above (e.g., course catalog expansion, learning interventions, assessments, access to materials, and skill development).

Thank you for the opportunity to comment on these important matters.

Sincerely,
Mark Raymond
Chief Information Officer, State of Connecticut

¹² U.S. Department of Education, “U.S. Department of Education Releases Guidance on Responsible Use of Education Technology in the Classroom,” press release, August 20, 2026, <https://www.ed.gov/about/news/press-release/us-department-of-education-releases-guidance-responsible-use-of-education-technology-classroom>.

¹³ See Connecticut State Educational Technology Plan at <https://www.CT.gov/EdTechPlan>; Connecticut State Department of Education, “Connecticut Releases Updated Position Statement and Guidance on the Use of Personal and Purposeful Technology in Schools,” press release, August 5, 2026, <https://portal.ct.gov/sde/press-room/press-releases/2026/use-of-personal-and-purposeful-technology-in-schools>.



Chair, Connecticut Commission for Educational Technology

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