



SHLB

SCHOOLS, HEALTH & LIBRARIES  
BROADBAND COALITION

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# Policy Platform

# 2024

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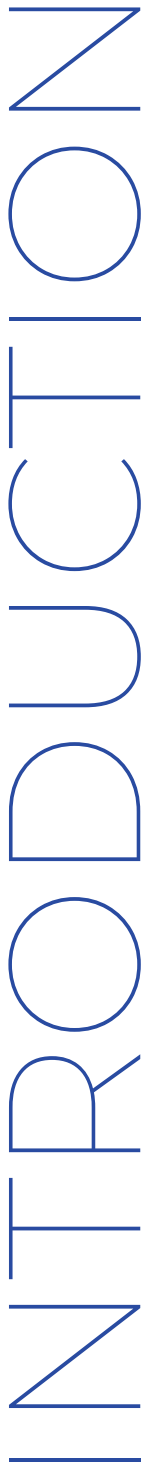
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**The mission** of the Schools, Health & Libraries Broadband Coalition (SHLB) is to promote open, affordable, high-quality broadband for anchor institutions and their communities.

**Anchor institutions** are foundational resources in our communities. They promote broadband deployment and adoption and provide essential digital services for vulnerable populations. This is why they deserve a prominent place in the nation’s broadband policy framework.

**Our members** recognize the importance of anchor institutions, and help to drive forward SHLB’s mission. Each month we conduct regular meetings with our members on a variety of broadband issues. With over 300 members from varying organizations, we are able to foster discussion from multiple viewpoints and garner insight from individuals within different sectors of the broadband space. These discussions then inform our federal and state advocacy.

**This year’s** policy platform highlights the various broadband issues that SHLB plans to address in 2024. Within each topic, we look for opportunities to advocate for anchor institutions and their communities at the federal and state level. While we highlight many issues in this platform, these remain only guideposts to the policy work that we might accomplish throughout the year. SHLB always remains flexible in its efforts and adapts to the dynamic policy landscape.

# MESSAGE TO OUR MEMBERS



Dear SHLB Members,

**2023 was a banner year for our organization!** Did you know that we filed well over two dozen filings (including comments, letters, memorandums, and Ex Parte summaries); conducted meetings with the FCC, Congressional staff, NTIA, and state broadband officials; and organized educational, policy-focused content every month through our member policy calls and webinar series? And we can't forget our stellar AnchorNets conference in DC, where many of *you* participated in policy discussions and experienced SHLB's work first hand. All of this is no trivial feat for our small (yet mighty) team. If you'd like to look back on our accomplishments, I've included a list of SHLB's filings at the end of this document in Appendix A.

All of this hard work is certainly worth it - last year we saw great progress made on many of our policy priorities. For example, the FCC granted in part SHLB's petition to extend the ECF service delivery deadline, incorporated several SHLB recommendations to help streamline the E-rate program, and declared that E-Rate funding supports Wi-Fi connectivity on school buses. The FCC also adopted changes to the Rural Health Care program based on the direct recommendations brought to it by SHLB members. Regarding broadband infrastructure, the NTIA allowed alternative solutions to the BEAD program's letter of credit requirement – an endeavor that SHLB helped champion. All of this work is truly a reflection of the knowledge and passion that our members bring to the table to help SHLB drive beneficial change for anchor institutions and the communities they serve.



As we move into 2024, SHLB remains committed to monitoring existing federal broadband programs as well as future policies that affect anchor institutions and their communities. We will also strive to be thought leaders in the broadband space, exploring topics like equitable access to healthcare, cybersecurity solutions, and what it *means* to deploy broadband, including various broadband models, garnering community support and partnerships, and deriving sustainable value.

We look forward to working with our members on all of our advocacy endeavors.  
*Let's continue to remind Washington that anchors truly do rock!*



  
Kristen Corra, Policy Counsel

# THE UNIVERSAL SERVICE FUND

The federal Universal Service Fund (USF) is crucial in supporting access to communications services, including high-speed internet connections for schools, libraries, and healthcare providers, plus the communities they serve. It is the largest federal funding program that provides ongoing, consistent financial support to ensure high-speed access is available and affordable to all. To finally solve the “digital divide”, the USF must be preserved and strengthened.

01

## Contribution Reform

The biggest threat to the USF is its inadequate funding mechanism that collects fees based on interstate telecommunications revenues (which are declining) to fund broadband services (which are increasing). The contribution fee on consumers’ bills is at 34.6% in Q1 2024 and is likely to increase even more in the near future. USF funding reform is needed to ensure that USF programs are fully funded to keep pace with a dynamic broadband marketplace. Last year, SHLB worked with a large group of stakeholders and met with Congressional staff to discuss its [recommendations](#) for the future of the USF. Congress is continuing to look at potential USF reform, and we will advocate for thoughtful and successful programmatic and contribution reform in 2024.

02

## Constitutionality Claims

The constitutionality of the USF mechanism is under attack by various parties filing legal challenges in several U.S. Circuit Courts. Due to the importance of USF funding for anchor institutions, SHLB has intervened in those cases and will continue to support the FCC and the continued operation and constitutionality of the USF. Our message in these proceedings is an important one: Without USF funding, anchor institutions and the communities they serve will be left behind. For example, students lacking adequate broadband at home will not be able to complete homework or develop the digital skills needed to prepare for their future; unconnected individuals and adult learners will not be able to utilize resources offered at their community organizations to find jobs; and those residing in remote areas might not have access to life-saving telemedicine – to name only a few.

# THE E-RATE PROGRAM

Last year, the FCC adopted policy reforms that continue to modernize the E-rate Program. For example, we saw the FCC take great strides in its [Streamlining Order](#) to ensure that tribal libraries can successfully participate in the program. The FCC also adopted a [Declaratory Ruling](#) clarifying that E-rate can fund Wi-Fi connectivity on school buses – a measure taken to narrow the Homework Gap. SHLB consistently stayed at the forefront of these developments, engaging with its members about these policy changes, filing comments, and meeting with FCC Commissioners’ offices and staff directly. But the work doesn’t stop there. The FCC has teed-up additional proposals that would affect the program’s reach. SHLB will continue to engage with its members and FCC Commissioners offices and staff to help shape future proposals.

01

## Cybersecurity

The FCC has proposed a three-year, \$200 million pilot program to fund cybersecurity protection of E-Rate-funded broadband networks in our schools and libraries. SHLB supports this initiative but suggests that three years is too long before taking more permanent action. We also suggest that the FCC take additional measures *now* to immediately help schools and libraries safeguard their networks against an increasing threat of cyber-attacks. For example, the FCC can update the current definition of eligible “basic firewalls” to include more advanced features.

02

## Hotspot Funding

Following the success of the Emergency Connectivity Fund (ECF) program during the pandemic, the FCC has proposed modernizing the E-rate program to fund Wi-Fi hotspots and wireless internet access services for educational use by students and library patrons off-premises. SHLB supports this proposal but recommends that the FCC allow applicants to choose the best and most cost-effective connectivity solutions for their communities, whether through commercially available providers or self-provisioned networks through schools and libraries.

03

## Wi-Fi on School Buses

As referenced above, last year the FCC clarified that E-rate can fund Wi-Fi connectivity on school buses for educational use. While the FCC and USAC work to develop the application process, the constitutionality of this decision has come under attack in a legal action filed by several parties in the Fifth Circuit. SHLB has intervened in this case in support of the FCC and the continued implementation and legitimacy of this program.

04

## USAC Training

USAC held a successful in-person workshop alongside SHLB’s annual AnchorNets conference last year. We support E-rate training opportunities for all applicants and program stakeholders and will encourage USAC to prioritize training efforts as much as possible.

# THE RURAL HEALTH CARE PROGRAM & TELEHEALTH

SHLB played a direct role in securing multiple improvements to the Rural Health Care (RHC) Program last year. By filing public comments and meeting with FCC staff, our members brought certain programmatic hardships to light, including complexities with the Service Provider Identification Number (SPIN) change filing deadline and the inability of healthcare providers to request start and end date changes to evergreen contracts following a funding commitment. We were pleased to see the FCC adopt many of our recommendations in its [Third Report and Order](#). SHLB will monitor the implementation of these changes and continue to advocate for ways to streamline and enhance RHC Program rules and reduce administrative burdens on participants. We will also advocate for federal and local policies impacting the dynamic healthcare sector.

01

## Cybersecurity

Last year, the White House and other federal agencies recognized the importance of protecting K-12 and library broadband networks from cyber-attacks and [launched new efforts](#) to strengthen cyber defense at our nation's schools and libraries. Because of the increasing number of incidents affecting healthcare clinics and patient records, SHLB believes that future agency and Congressional action should also include cyber-related measures to protect the healthcare sector, like providing similar resources and toolkits to providers.

02

## Telehealth and Telemedicine

As online services become ubiquitous throughout our daily lives, SHLB will advocate for individuals to have equitable broadband access to healthcare. Access to telehealth and telemedicine services should be standard for healthcare providers and patients, and robust broadband access should be available at all places where patients go (and can easily get to). Users should have the resources, training, and devices they need to participate in their care when they are not physically in the doctor's office.

03

## Application Processing

To ensure that the RHC Program meets its goal of enabling online patient care for rural communities, we need to monitor the underlying systems that make the program work. SHLB members have first-hand, on-the-ground knowledge of funding application requirements and processing that we often highlight to the FCC and USAC. We will continue to foster quarterly meetings with USAC so that healthcare stakeholders can provide helpful feedback and discuss important programmatic changes at the federal level.

# BROADBAND DEPLOYMENT

To further SHLB’s mission to promote the deployment of open, high-quality broadband infrastructure across the country, we will continue to advocate for policies that expand broadband investment for anchor institutions and the unserved and underserved communities they serve. We have seen the most broadband funding in history through federal programs like the Broadband Equity, Access, and Deployment (BEAD), Capital Projects Fund (CPF), Connecting Minority Communities (CMC), and the Rural Digital Opportunity Fund (RDOF) programs. SHLB will continue to support and monitor the implementation of these programs and provide insight to state and federal leaders about successes, concerns, and recommendations for improvement.

01

## Mapping Anchor Institutions

SHLB supports the efforts of states to build a robust database of anchor institutions – including where they are located and how they are currently served by broadband. Anchor institutions are the bedrock of communities, and will continue to serve as an important resource for individuals that seek connections to broadband at home. States should recognize the benefit of having a complete database of anchor institutions at their disposal to utilize in any future state and federal broadband funding opportunities.

02

## Future Broadband Deployment

SHLB will continue to explore and support regulatory changes that promote greater broadband deployment, such as policies around pole attachments, rates, and permitting; innovative broadband deployment models (including open access); tax relief; and others that drive broadband investment to solve the digital divide. We will also continue to support state-based research and education networks, which can provide a variety of technology services for anchor institutions. Further, we will strive to underscore the value a community can derive from greater connectivity options.

03

## Institutions of Higher Education

SHLB recognizes the important role that institutions of higher education play in broadband deployment and adoption, and will continue to support access to high-speed broadband for learners of all ages, including at colleges, universities, and at home. We support the Connecting Minority Communities pilot program that provides funding for broadband access to HBCUs and other minority-serving institutions. HBCUs often provide broadband service both on-campus and to off-campus students surrounding the institution, and these are prime examples of our “to and through” philosophy. We are also pleased that the ACP program is available to recipients of Pell grants, and we will work to ensure that these recipients continue to be eligible in any long-term funding mechanism for the ACP. Additionally, we support access to ACP for those students that are eligible for a Pell Grant (but who might not choose to accept it).



# 04

## Tribal Broadband

SHLB supports the Tribal Broadband program being administered by NTIA, but we believe changes should be made to the program to recognize Tribal sovereignty over their lands. Tribal communities, and their anchor institutions, are among the most underserved locations in the country. We are pleased that the ACP program offers greater discounts of \$75/month for Tribal households, and will continue to support these discounts in any long-term version of the ACP. Tribal broadband providers also need access to unlicensed and shared spectrum, as well as pole attachments, so that they may bring the benefits of high-speed internet access to all Tribal residents.

# POLE ATTACHMENTS

Policy around pole attachments can encompass a lot of issues – from permitting processes and time frames for action by the pole owner, to overhauling and replacing existing infrastructure. Unfortunately, utility pole owners and attachers all too often find it hard to come to an agreement on how to allocate pole attachment costs, especially when it comes to pole replacements. Disputes between pole owners and attachers can significantly delay or suspend new broadband buildouts. Such decisions unfortunately affect entities beyond just the owner and attacher, like anchor institutions that rely on existing infrastructure to receive affordable access to upgraded broadband in their area. SHLB filed numerous comments and recommendations to the FCC over the past few years emphasizing the need to update and enforce its pole attachment policies. While the FCC has taken certain positive actions, we will continue to urge streamlined, fair, and clear pole attachment policies at both the federal and state level.

# 01

## Cost-Allocation for Pole Replacements

Last year, the FCC adopted new regulations around pole attachments in its [Fourth Report and Order and Declaratory Ruling](#). We appreciate the FCC's decisions, many of which work to make the pole attachment process faster, more transparent, and more cost-effective. However, the FCC has not yet fully addressed the critical issue of pole replacement costs, despite a substantial amount of evidence in the record supporting a cost-allocation approach. We will continue to urge the FCC to provide additional guidance and recommendations on this topic that states can adopt.

# 02

## Pole Attachments and BEAD Planning

State broadband offices are expected to begin receiving bids for service funded by the BEAD program later this year. Because NTIA's guidance encourages states to use existing infrastructure where possible when building out new networks (which helps make BEAD funds go further), the issue of pole attachment policies and replacement costs will be a significant factor in states' decisions and budgets. SHLB will continue to engage with NTIA and state broadband officials about pole attachment policies and legislation and find ways to put forth helpful recommendations. We will also continue to work with policymakers at the federal and state level to seek legislative changes that will better facilitate timely and cost-effective pole access to support deployment.

# DIGITAL EQUITY & INCLUSION

SHLB will advocate for increasing the role of anchor institutions in ensuring that individuals in their community can enhance their digital skills, access the devices and resources needed to use those skills, and otherwise adopt and use new broadband infrastructure. Anchor institutions have historically been at the forefront of community equity initiatives and can and should make a significant contribution to this work in 2024 (and beyond).

# 01

## Sustainable Resources for Anchor Institutions

Digital inclusion work should be ongoing, strategic, and sustainable – encompassing more than training opportunities, device lending programs, and other educational efforts only when temporary funding becomes available. To create a sustainable environment to achieve digital equity, anchor institutions need access to consistent funding and resources dedicated to digital inclusion work. While current efforts such as the Digital Equity Act programs are helpful, we believe that this endeavor deserves long-term funding and planning support at the federal and state levels so that adoption initiatives aren't stalled for those who come to rely on them.

# 02

## Partnerships and Coalition Building

While community anchor institutions are champions of digital inclusion work, they will need outside human capital in order to affect long-term digital equity change. To accomplish this, we believe that collaboration will be a key driver for creating sustainable digital equity efforts and we will encourage anchor institutions to establish strategic partnerships with other anchors and their local and state leaders. We will also continue to recommend to state leaders that anchor institutions should be at the helm of any future digital equity planning, given their direct access to the community and knowledge of its connectivity needs.

03

### Long-Term Support for ACP

SHLB believes that the Affordable Connectivity Program (ACP) is vital to keep broadband costs affordable and increase digital adoption for people in need. To continue this important program, we will advocate for both short-term funding to maintain the program through 2024, as well as long-term solutions to establish a consistent mechanism that communities in need can rely on.

## WIRELESS, SPECTRUM, & ANCHOR-ENABLED NETWORKS

Because many anchor institutions use wireless services to provide broadband access to their constituents and the surrounding communities, SHLB tracks emerging trends and technologies in the wireless space and advocates for policies that support the needs of anchor institutions and those they serve. As federal agencies build out future spectrum strategies, we will continue to recommend policies that (i) recognize anchor-enabled broadband networks as innovative uses of spectrum and (ii) enable future development of anchor-enabled broadband networks by making unlicensed, shared licensed, and exclusively licensed spectrum available to anchor institutions and other entities.

01

### Showcasing Anchor-Enabled Connectivity

SHLB recognizes the importance of showcasing the unique and solution-oriented endeavors of anchor institutions when it comes to connecting communities to broadband. While anchors provide a host of essential digital services to patrons, many have also extended broadband connectivity beyond their four walls by using wired or wireless technologies to offer low-cost service to surrounding disadvantaged or low-income neighborhoods that are unserved or underserved. We will continue to identify and showcase these projects to help shape policies that make anchor-led networking solutions eligible for federal financial support and subsidies.

02

### Unlicensed and Licensed Spectrum

Anchor institutions cannot implement and support innovative wireless technology solutions without having access to adequate spectrum. This is why we believe that future spectrum policy solutions should ensure that adequate unlicensed and licensed (including shared-licensed) spectrum is available for use by anchor institutions and the providers that serve them. Even if an anchor institution chooses not to deploy its own network (or it is not economically feasible), when more entities have access to shared, unlicensed, and licensed spectrum, it can increase competition in the marketplace and lower costs to those who buy and rely on spectrum services, including anchors.

The SHLB Coalition is a nonprofit, 501(c)(3) public interest organization. The SHLB Coalition is based in Washington, D.C. and has a diverse membership of commercial and non-commercial organizations from across the United States.

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## MEMBERSHIP

The SHLB Coalition is grateful to our over 300 members for their continued support and to our corporate sponsors:



[\*\*JOIN OUR MEMBERSHIP ORGANIZATION TODAY\*\*](#)

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# APPENDIX A

## Infrastructure & Broadband Adoption

- [SHLB Comments on the Development of Digital Equity Act Programs](#)
- [SHLB Response to Senator Thune's Letter](#)
- [SHLB Comments regarding broadband Labeling requirements](#)
- [SHLB Comments to the CPUC regarding BEAD](#)
- [SHLB Response to NTIA's Request for Comment regarding BEAD Uniform Guidance](#)
- [Coalition letter addressed to the NTIA and Department of Commerce regarding alternative solutions to BEAD letter of credit requirement](#)
- [SHLB recommendations to state broadband leaders regarding broadband planning for BEAD and future deployment efforts](#)
- [Ex Parte Summary of SHLB meetings with FCC Commissioner and Bureau Staff regarding Pole Attachments draft Order](#)

## Broadband Mapping

- [Missing Pieces: How the FCC's Broadband Map Misrepresents Public Libraries](#)
- [Ex Parte Summary of ALA/SHLB Meeting with FCC Broadband Data Task Force to discuss the National Broadband Map](#)
- [Ex Parte Summary of SHLB Meeting with Commissioner Carr's Office to discuss the National Broadband Map](#)
- [SHLB Comments to NTIA's Proposed BEAD Challenge Process Guidance](#)

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*Bridging the Digital Divide One Anchor Institution at a Time*

## Emergency Connectivity Fund

- [SHLB Petition to Extend ECF Service Delivery Deadline](#)
- [Ex Parte Summary of SHLB Meeting with FCC Bureau regarding petition to extend ECF service delivery deadline](#)
- [Ex Parte Summary of SHLB Meeting with Rosenworcel's Office regarding petition to extend ECF service delivery deadline](#)
- [Ex Parte Summary of SHLB meeting with FCC Bureau regarding ECF Lessons Learned for E-rate Program](#)

## E-rate Program

- [Multiple Coalitions Cybersecurity Comments](#)
- [SHLB Cybersecurity Reply Comments](#)
- [Multiple Coalitions Tribal Libraries/E-rate Comments](#)
- [SHLB Ex Parte Summary of meeting with Rosenworcel's Office regarding E-rate competitive bidding portal and ECF](#)
- [Ex Parte Summary of meeting with Rosenworcel's Office regarding cybersecurity](#)
- [Ex Parte Summary of meeting with FCC Bureau regarding Cybersecurity](#)
- [Ex Parte Summary of meetings with FCC Bureau, Commr's Starks, Simington, and Chairwoman's office regarding E-rate/Tribal Libraries Order and FNPRM](#)
- [SHLB E-rate FNPRM Comments](#)
- [Ex Parte Summary of meeting with Chairwoman's office regarding Use of Wi-Fi on School Buses is Eligible for E-Rate Funding](#)
- [SHLB E-rate FNPRM Reply Comments](#)
- [Ex Parte Summary of meeting with Commissioners' offices regarding Future NPRM on Hotspot Eligibility Under E-rate](#)
- [SHLB E-rate ESL Comments regarding Wi-Fi on school buses](#)

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*Bridging the Digital Divide One Anchor Institution at a Time*

## Rural Health Care Program

- [Ex Parte Summary of SHLB meeting with FCC offices regarding the Order on Reconsideration, Second Report and Order, Order, and Second Further Notice of Proposed Rulemaking](#)
- [SHLB Comments regarding the Second Further Notice of Proposed Rulemaking](#)
- [SHLB Reply Comments regarding the Second Further Notice of Proposed Rulemaking](#)
- [Ex Parte Summary of SHLB meetings with FCC Commissioner and Bureau Staff regarding Rural Health Care Program draft Order](#)
- [Letter Supporting CHC's Petition for Waiver of RHC Invoicing Deadline](#)

## Universal Service Fund

- [SHLB Responses to the Universal Service Fund \(USF\) Working Group Request for Comment](#)

## Wireless & Spectrum

- [PISC Comments in 6 GHz Proceeding](#)
- [WiFi Forward Letter](#)
- [PISC Comments in National Spectrum Strategy Proceeding](#)
- [SHLB Comments in National Spectrum Strategy Proceeding](#)
- [SHLB & CoSN Comments to NTIA ITS CBRS Report](#)
- [SHLB Letter to FCC regarding 2.5 GHz licenses](#)

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