

TO: NAFIS, AASA, AESA Members
DATE: September 2026
RE: E-Rate Call to Action

This document details the what, why and how of filing comments in response to the Federal Communications Commission's (FCC) Notice of Proposed Rule Making (NPRM) for the E-Rate program. Additional information and resources—including our overview, template for comments, FAQ, and supporting data—can be found on our [Keep Schools Connected: Protect E-Rate](#) website.

Important Information

- The priority ask is for members to file personalized comments with the FCC.
- The FCC's NPRM/FNPRM was published in the Federal Register on August 14, 2026.
- Public comment deadline: October 13, 2026.
- Submit your comment thru our call to action on our [Keep Schools Connected: Protect E-Rate](#) site.
- You can access step-by-step instructions for filing your comments directly through the FCC's [Electronic Comment Filing System](#) (ECFS) on the [SHLB website](#).

Why should members file comments? Because the FCC is asking for evidence—not just opinions. The FCC uses the NPRM process to collect information submitted by stakeholders. Submitting comments provides you with the opportunity to explain:

- What E-Rate pays for in your district;
- How much your district receives;
- What percentage of your connectivity costs E-Rate supports;
- Which services or infrastructure would be affected if support were reduced;
- What your district would have to cut, delay, or fund locally;
- How E-Rate affects your students, educators, and communities;
- How E-Rate supports rural, low-income, or otherwise underserved communities;
- Why particular services remain necessary despite improvements in broadband availability;
- How E-Rate has helped your district achieve educational or community goals; and
- What changes would improve E-Rate without undermining its core purpose.

What should members talk about? You do not need to be a lawyer or E-Rate expert to respond. A helpful way to think about framing your comments would be in five buckets:

- Your organization: Briefly explain who you are (School district, library, consortium, educational service agency).
- How you use E-Rate: Describe what E-Rate currently supports (internet access, WAN, Fiber, WI-Fi, network switches/routers, internal connections, other eligible services)
- The financial impact: Provide numbers, to the extent possible, including your district's: annual E-Rate funding, total cost of eligible services, discount rate, required non-discount share, costs that would shift to local funds if E-Rate support were reduced, and any planned projects that depend on E-Rate support.
- The educational or community impact: Explain what connectivity makes possible. For school districts this could include classroom instruction, online learning platforms, digital curricula, assessments, career and technical education, administrative systems, operational systems, school communications; and cybersecurity.

- **What you want the FCC to do:** Be specific. Our asks are clear. We want the FCC to protect the E-Rate program, maintain broad access to E-Rate, preserve support for both rural and urban communities, maintain support for broadband and internal connections, avoid changes that shift substantial costs to local governments, preserve support for services that remain essential to modern education and library services, make administrative improvements without reducing access to funding and study proposed changes before implementing them.

Comment vs. reply comment: What's the difference?

- **Initial comments:** Initial comments are your opportunity to tell the FCC what you think and provide evidence supporting your position. Members should use this filing to establish the core facts and arguments they want the FCC to consider.
- **Reply comments:** Reply comments come later. They provide an opportunity to respond to arguments, evidence, or proposals submitted by other parties during the initial comment period. For most members, the initial comment is the most important place to start.

What makes an effective comment? An effective comment is:

- **Specific:** Explain exactly what part of the proposal concerns you.
- **Evidence-based:** Use numbers, examples, and experience from your organization.
- **Local:** Explain what the proposal means for your students, patrons, staff, or community.
- **Constructive:** Don't just explain what you oppose. Tell the FCC what you think it should do instead.
- **Concise:** A clear two- to five-page comment can be more effective than a lengthy submission that does not clearly identify the organization's position.

How do I file comments? AASA/AESA full set of resources are available on [Keep Schools Connected: Protect E-Rate](#). You can access step-by-step instructions for filing your comments directly through the FCC's [Electronic Comment Filing System](#) (ECFS) on the [SHLB website](#).

This document is intended as a general advocacy and educational resource and should not be treated as legal advice. Members should review the FCC's official documents and applicable filing instructions before submitting comments.