

TO: NAFIS, AASA, AESA Members

DATE: September 2026

RE: Summary of FCC NPRM

This document is intended as a quick overview/summary of the Federal Communications Commission's (FCC) Notice of Proposed Rule Making (NPRM) for the E-Rate program. Additional information and resources—including our call to action, template for comments, FAQ, and supporting data—can be found on our [Keep Schools Connected: Protect E-Rate](#) website.

What has the FCC proposed? On June 25, 2026, the FCC adopted FCC-26-41, titled *Ensuring Children's Safe Use of Screens and E-Rate-Funded Services; Modernizing the E-Rate Program for Schools and Libraries; Establishing the Emergency Connectivity Fund to Close the Homework Gap; and Promoting Fair and Open Competitive Bidding in the E-Rate Program*.

The item covers four related FCC dockets:

- WC Docket No. 26-133 — Ensuring Children's Safe Use of Screens and E-Rate-Funded Services
- WC Docket No. 13-184 — Modernizing the E-Rate Program for Schools and Libraries
- WC Docket No. 21-93 — Establishing the Emergency Connectivity Fund to Close the Homework Gap
- WC Docket No. 21-455 — Promoting Fair and Open Competitive Bidding in the E-Rate Program

The proceeding has two distinct parts.

Part 1: The NPRM: This part poses fundamental questions about the future of E-Rate. The FCC is asking stakeholders to weigh in on whether the program should continue in its current form and, if not, how it should change. Among other things, the FCC asks about:

- Whether E-Rate should be narrowed or reoriented. The FCC points to the significant growth in broadband connectivity in schools and libraries and asks whether the program should be changed to reflect those developments.
- Whether E-Rate should be limited geographically. The FCC asks whether support should be limited to rural areas or to locations where there is limited provider competition.
- Whether some E-Rate-supported services remain necessary. The FCC asks questions about the continuing need for various categories of support, including broadband, Wi-Fi, self-provisioned networks, special construction, and other connectivity investments.
- Whether the E-Rate discount structure should change. The FCC is asking questions about the existing discount methodology and whether the current approach remains appropriate.
- Whether E-Rate-funded networks should be subject to additional requirements concerning children's screen use. The FCC is examining how E-Rate-funded networks are used by students and whether additional measures could be taken to empower parents, teachers, and schools and address concerns about screen time.
- Whether the FCC should change its interpretation of the Children's Internet Protection Act (CIPA). The FCC is asking whether its current interpretation of CIPA remains the best interpretation of the statute and raises questions about the scope of existing requirements. Please note: these are questions for public comment—not new CIPA requirements that schools and libraries must follow today.

Part 2: The FNPRM: The FNPRM contains more concrete proposals concerning how E-Rate is administered.

- **New oversight of E-Rate consultants:** The FCC proposes to:
 - Establish a definition of an E-Rate “consultant”;
 - Create a new FCC Form 5654 for annual consultant certification and disclosure;
 - Establish a consultant registration database;
 - Require additional consultant-related documentation; and
 - Prohibit certain percentage-based consultant fee arrangements.

These proposals could affect both organizations that use E-Rate consultants and the consultants themselves.

- **Changes to E-Rate contracts and administration:** The FCC proposes changes involving:
 - When E-Rate contracts must be signed;
 - Documentation of service-provider selection;
 - Service substitutions;
 - Consortium-member certifications;
 - Service-provider certifications; and
 - Other E-Rate forms and filing procedures.
- **Changes involving cost-effectiveness and pricing:** The FCC is also seeking input on issues involving cost-effectiveness, Managed Internal Broadband Services (MIBS), reseller pricing, and the Lowest Corresponding Price (LCP) requirement. These issues are particularly important to service providers and applicants involved in competitive bidding.
- **Changes involving the Emergency Connectivity Fund:** The FCC proposes to remove obsolete rules associated with the pandemic-era Emergency Connectivity Fund. This is separate from the core E-Rate program, but it is included in the same proceeding.

What could this mean for schools and libraries? The answer depends on what ultimately happens after the comment process. The NPRM is a proposal and none of the proposed changes are in effect; this NPRM process is essentially an extremely far-reaching request for information. While the proposed changes are not yet final, the rule does raise several questions that could have major consequences. If E-Rate were significantly narrowed, schools and libraries could face:

- Higher costs for Internet and connectivity services;
- Greater pressure on local budgets;
- Reduced ability to upgrade network infrastructure;
- Less support for rural and high-cost communities;
- Reduced access to managed Wi-Fi and other internal connectivity services;
- Greater difficulty funding large-scale infrastructure projects; and
- Increased disparities between communities with different levels of local resources.

The FCC itself is asking commenters to provide evidence about what would happen to schools and libraries if E-Rate were limited or terminated, including whether applicants could continue to afford the services they currently receive. It is critical that comments include local, specific information that details how your district uses E-Rate and how the proposed changes would impact you.

How do I file comments? You can access our call to action, template comments and all related information on [Keep Schools Connected: Protect E-Rate](#).

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.