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October 13, 2026

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Marlene H. Dortch,
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Ensuring Children's Safe Use of Screens and E-Rate-Funded Services;
Modernizing the E-Rate Program for Schools and Libraries; WC Docket Nos. 26-133,
13-184, 21-93, and 21-455

Dear Secretary Dortch:

The National Association of Federally Impacted Schools (NAFIS) appreciates the opportunity to comment on the Federal Communications Commission's proposed changes to the E-Rate program. NAFIS represents school districts across the nation that educate students who live on or are otherwise affected by federal property, including military installations, Tribal lands, federal housing, national laboratories, and other federal facilities. Because of this structure, our members have less local capacity to fund connectivity than a typical district. For many federally connected districts, E-Rate is not a supplement, but the reason students have reliable internet at all.

NAFIS supports the Commission's goal of ensuring that E-Rate resources are used effectively and with appropriate program integrity. However, we urge the FCC to consider the unique circumstances of federally impacted school districts when evaluating changes to E-Rate eligibility, discounts, infrastructure support, and administration.

Preserve broad E-Rate eligibility. The Commission should not restrict E-Rate eligibility based solely on rural status or the number of broadband providers serving a community. Impact Aid districts vary significantly in geography and community characteristics. A district may serve a military installation, tribal lands, or other federal community while being located in a suburban or metropolitan area. Similarly, the presence of multiple providers does not necessarily mean that schools have access to affordable, reliable, high-quality broadband.

Maintain support for infrastructure and special construction. NAFIS urges the FCC to preserve E-Rate support for special construction, fiber, and other infrastructure options. For districts serving remote or geographically dispersed communities, commercial deployment may not provide an adequate or economically feasible connection to schools. Other federal broadband programs should complement, not replace, E-Rate support for school connectivity.

Protect the E-Rate discount structure. Participation in the National School Lunch Program, geographic classifications, and provider competition are imperfect measures of a district's need for affordable connectivity. Impact Aid districts vary

considerably in their geographic and fiscal circumstances, and many serve schools located on or near federal property where infrastructure can be particularly challenging or costly. The Commission should ensure that changes to E-Rate eligibility or discount levels do not inadvertently disadvantage federally impacted districts based on broad classifications that do not reflect the actual cost and availability of broadband services.

Avoid unnecessary restrictions on educational technology use. NAFIS supports protecting students online, but the Commission should avoid requirements that unnecessarily restrict legitimate educational uses of E-Rate-supported networks. Local educators, administrators, school boards, and families are best positioned to determine how technology supports instruction and student learning.

Minimize administrative burdens. NAFIS supports appropriate program oversight but urges the FCC to ensure that new registration, disclosure, bidding, or documentation requirements do not create unnecessary burdens or procedural traps. Smaller districts with limited administrative and technology staff can be disproportionately affected by additional compliance requirements.

E-Rate is an important federal investment in ensuring that students and educators have access to reliable connectivity. NAFIS urges the Commission to modernize the program in a manner that preserves access for federally impacted districts and recognizes their unique geographic and fiscal circumstances.

Thank you for considering our comments.

Sincerely,



Quincy Natay
President
National Association of
Federally Impacted Schools (NAFIS)



Cherise Imai
Executive Director
National Association of
Federally Impacted Schools (NAFIS)