

Paragraph	FCC question(s)
12	Has Congress’s directive in section 254(h) been satisfied? Should E-Rate be limited or sunset? Does the FCC have authority to do so? When should policymakers conclude the core objective has been achieved? Did Congress intend E-Rate to operate indefinitely?
13	Is the FCC’s current implementation beyond the discount mechanism Congress described? May the FCC narrow support based on a better reading of the statute, even if it cannot terminate the program entirely?
14	Does section 254(h)(1)(B) authorize the current E-Rate structure, including direct payments and discount tiers based on NSLP and urban/rural status? Is the expansion of eligible services and equipment supported by the statute’s text, structure, and history?
15	Does section 254(h)(2)(A) allow a separate funding mechanism for schools and libraries? Does it permit direct support payments to non-ETCs?
16	After Loper Bright, are past Chevron-sustained interpretations still consistent with the statute’s text and structure? Should the FCC revisit those interpretations?
17	Does section 254(c)(1)’s “evolving level” language permit narrowing as well as expansion? Should the increase in school/library connectivity affect how the standard is read today?
18	What services are supported by E-Rate? Would limiting or ending the program affect affordability? Would it affect online safety? How might school/library connectivity needs change over the next 5–10 years? Should E-Rate be updated, and how?
19	Why does demand continue to fall below the cap? Do schools and libraries have other connectivity needs outside the current program? How should past E-Rate support or other broadband funding affect the future of E-Rate?
20	Is the current structure consistent with section 254, or should E-Rate be limited/restructured to reflect today’s connectivity rates, reduce federal spending, and avoid duplicative or unauthorized support? What specific rule changes and legal authority would support any proposed update?
21	Are there services now eligible that are no longer necessary or inconsistent with the statute? Are there services that do not ultimately transport information to classrooms or libraries and therefore should be ineligible?
22	Is self-provisioned network construction and dark fiber still justified? Should applicants and providers disclose other funding sources? Should special construction be limited to single-provider areas or eliminated? Should LCP guidance be expanded? Do BEAD and similar programs make E-Rate support for self-construction unnecessary?

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23	Should the presumption that on-campus activity serves an educational purpose be reversed or altered?
24	Are program expansions driven by vendor interests rather than educational purpose? Do current rules incentivize vendor-driven deployment models that increase subsidized reliance without improving educational outcomes? Does E-Rate advance AI-related policy goals, and should it be adjusted to support AI-enabled education?
25	Is the NSLP/urban-rural discount matrix still effective? Does it allocate funds fairly and efficiently? Should rural discounts be higher? Should discount rates be modified to improve cost-effectiveness? Should funding be phased out in low-NSLP areas?
26	Do lower competition and lower affordability still justify support? Should E-Rate be limited to high-cost areas, rural areas, or single-provider areas? Should discount levels be adjusted when prices are competitively low?
27	Does the comparability principle require the discount mechanism to operate identically in competitive and noncompetitive areas, or would a more targeted approach better serve the statute?
28	Does E-Rate influence educational practices and outcomes? Is there evidence linking higher E-Rate support to 1:1 devices, digital curricula, screen-based instruction, or better/worse academic results? Should educational outcomes influence FCC policy, and how should they be measured?
29	How can the FCC ensure E-Rate-funded networks are used for educational purposes? Do reward/calm-down uses count? How can applicants ensure educational use? What are the costs and benefits of screen-time limitation measures? Are there differences between schools and libraries?
30	Should E-Rate funding be conditioned on screen-time limits? If so, who should set those limits, and what authority would the FCC have?
31	Should schools be required, as a condition of E-Rate, to let parents opt children out of screen-based instruction or screen use? What impact would that have on instruction, costs, and administration? Does the FCC have authority to require this?
32	What can the FCC do, instead of or in addition to screen-time limits, to protect children online? Should adult supervision or reporting systems be required? Should requirements differ for schools and libraries? What authority would the FCC have?
33	Should Head Start and pre-K continue to receive E-Rate support? Should schools cost-allocate those users out? Should eligibility be limited to public-school-based entities? Would that reduce waste, fraud, and abuse?

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34	Is the FCC’s current interpretation of CIPA the best reading of the statute? What other steps can the FCC take to prevent harmful content exposure in device-rich environments?
35	Does CIPA apply only to school/library-owned devices or also to third-party devices? Should schools/libraries prevent third-party devices from connecting? What technical capabilities and costs are involved?
36	Should CIPA be interpreted more broadly to apply to any device accessing the Internet through a school/library E-Rate network, regardless of ownership? If so, how could schools/libraries comply?
37	Should technology protection measures include network-level filtering for any device? Should filtering include screen-time limits? What burdens and costs would that create?
38	What does “monitoring the online activities of minors” mean? What does “unauthorized access” mean? Should “computer” be defined? Are other CIPA terms unclear?
39	Should the FCC revisit the 2011 conclusion that social networking websites are not per se harmful to minors?
40	Should the FCC define what schools must do to educate minors about appropriate online behavior? Should that education include screen-time limits and digital/media literacy? Should completion be documented?
41	Should the FCC define “child” or use COPPA’s under-13 definition? Should CIPA protections vary by age? Should schools and libraries be treated differently?
42	Does CIPA permit additional protections such as screen-time limits? Are schools/libraries assessing screen time now? What filtering options exist? What is more important: time limits or content limits?
43	What information must an Internet safety policy contain? Can the FCC invalidate or replace such policies, or is that local authority? Should the FCC collect and publish policies?
44	Are template Internet safety policies adequate? Do they satisfy CIPA? How do safety policies differ from acceptable-use policies? Should the FCC require more content? Should policies be made public, and are there privacy concerns?
45	Are public notice and public hearing requirements being followed? What counts as reasonable notice? Should timing requirements be added? How should the FCC enforce them?
46	Should funding be reduced or recovered if notice/hearing requirements are not met? Should applicants be denied funding or forced to repay for the entire noncompliant period?

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47	Should more than one public hearing or meeting be required? Should every policy change trigger a new notice/hearing? Should there be annual hearings? What exceptions should exist?
48	How would narrowing or sunseting E-Rate affect child online safety protections? Will schools and libraries continue safety measures without E-Rate/CIPA conditions? What authority would the FCC have outside CIPA?
49	Does the FCC have any responsibility beyond CIPA to assess whether E-Rate-funded networks contribute to harmful screen use? What authority exists to limit screen time or increase parental control?
50	Should screen-time limits be age-based? What should those limits be? Does the FCC have authority outside CIPA? How would such limits be enforced?
51	Are educational and recreational screen time meaningfully different for E-Rate purposes? Should recreational use be reduced through stricter filtering? What authority exists outside CIPA?
52	To what extent has student-owned device use contributed to academic decline? How do different cell-phone bans affect use? Should the FCC impose per-day hour limits on E-Rate-funded networks? Does it have authority?
53	Who is better situated to protect minors online: FCC, parents, teachers, or a combination? How can the FCC collaborate with parents/teachers, and are there other network concerns it has authority to address?
57	Is the proposed consultant definition too broad or too narrow? Should certain people be excluded?
58	Should the consultant definition include other roles or exclude channel partners, resellers, agents, or authorized dealers?
59	Is the proposed consultant certification form appropriate? What should it require? Should similar certifications go on other E-Rate forms?
60	What disclosures should consultants provide? Should the information be shared with enforcement agencies? Are other certifications/disclosures needed? Should consultants submit directly to USAC?
61	When should the consultant form be filed? Should updates be required when conflicts or consultant relationships change?
62	What should happen if the consultant form is not filed on time? Should USAC hold forms, reject pending forms, deny disbursements, rescind funds, or refer to enforcement?

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63	What penalties should apply if the consultant form contains false statements? Should consultants face fines, imprisonment, FCA liability, or debarment? Should applicants/providers face similar penalties if they knowingly submit false consultant forms?
64	Why is a consultant registration database needed? Why is the current CRN process inadequate?
65	Should the E-Rate consultant database resemble the Lifeline RAD? Should consultants be locked out if suspicious activity is detected? What data should be used for registration?
66	What are the benefits and burdens of requiring individual consultant registration and unique CRNs?
67	What information should the consultant database collect? How often should it be updated? What penalties should apply for failing to update it? Are there alternatives to collecting SSN digits?
68	How should the consultant database protect privacy and security? Should it be public or restricted? Should any data be public?
69	Should USAC create an interim individual CRN process until the database is live?
70	Should percentage-based consultant fees be prohibited? Are any exceptions needed?
71	What consultant-related documents must applicants/providers retain? Should LOAs, fee agreements, and banking records be required?
73	Should applicants be required to enter into a new signed contract after competitive bidding and after the ACD? Should the Kalamazoo existing-contract exception end?
74	Is the Kalamazoo exception still needed? Could it be abused as a “cure” process?
75	Should applicants be barred from relying on pre-ACD existing contracts? Should state master contracts get an exception?
76	Should service substitution requests be in writing, under penalty of perjury, and approved before reimbursement?
77	Should FCC Form 473 have a hard annual filing deadline of June 30?
78	Should service providers be barred from participating until they file Form 473? Should applicants be allowed to switch providers if the original provider refuses?
79	Should consortium members have to submit Form 479 earlier and include additional certifications?

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80	Should consortium members certify the same program rules as other applicants? Should there be a grace period?
81	Should all form certifications be codified in the rules and standardized across forms?
82	Should applicant/provider certifications be expanded to reflect knowledge of rules and invoicing obligations?
83	What additional measures should apply when one or no bids are received? Should reseller margins be capped? Should reimbursement caps be based on market data?
84	Should MIBS continue to be a supported service? How should cost-effectiveness be defined and documented?
86	How should the FCC clarify the Lowest Corresponding Price rule? Should rates be public? Should LCP be the median? Should USAC determine it?
87	How should “similarly situated” and “similar services” be defined? Should the Telecom Program approach be used?
88	How should LCP violations be detected and enforced? Should LCP-specific certifications be added? Should continuing-violation theory be codified?
89	Should ECF rules be deleted from the CFR now that the program has sunset?
90	Should documentation-retention rules remain codified even after ECF sunset?
91	Should the Bureau be delegated authority to delete remaining ECF rules when no longer needed?

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