



October 13, 2026

RE: WC Docket Nos. 26-133, 13-184, 21-93, and 21-455

I. Introduction and Statement of Interest

On behalf of the Consortium for Constituents with Disabilities (CCD) Technology and Telecommunications and Education Task Forces, these undersigned members submit these comments in response to the Commission's Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking (NPRM and FNPRM) in the above captioned dockets. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society.

The recommendations below focus on several proposals in the NPRM that, if adopted without disability specific safeguards, would restrict the very connectivity and devices that students and library patrons with disabilities rely on to communicate, learn, and read. For many of these individuals, a screen is not a distraction. It is the door through which they access the curriculum at all.

II. Summary of Recommendations

We respectfully recommend that the Commission:

1. Decline to narrow, limit, or sunset the E-Rate program in ways that would reduce the affordable, high capacity broadband that assistive technology increasingly requires.
2. While we don't agree that the FCC should be regulating screentime, we request that, should that be executed upon, assistive technology and accessibility use be exempt from any screen time limit the Commission may consider, and defer to a student's IEP or Section 504 plan where those documents govern device use.

3. Reject network level filtering and third party device restrictions that would block personally owned assistive technology or legitimate accessibility content, and require that any technology protection measure be compatible with assistive technology.
4. Retain E-Rate eligibility for Head Start and pre-kindergarten facilities and students, given the importance of early intervention for young children with disabilities.
5. Confirm that use of E-Rate funded networks for assistive technology and accessibility is an "educational purpose" under the Communications Act.
6. Require that CIPA public notices, hearings, and internet safety policies be accessible to people with disabilities, including parents and guardians with disabilities.
7. Ensure that any changes to the E-Rate program or CIPA requirements preserve meaningful access for students and library patrons with disabilities and do not conflict with obligations under the ADA, Section 504, or IDEA.

III. Discussion

A. The Program Should Not Be Narrowed or Sunset in Ways That Reduce Connectivity for Students and Patrons With Disabilities

The NPRM asks whether the E-Rate program has fulfilled its mission and whether it should be limited or sunset in light of today's connectivity rates. Even where basic connectivity exists, the assistive technology that students and patrons with disabilities use has grown steadily more bandwidth intensive. Cloud based augmentative and alternative communication (AAC) applications, real time captioning, automatic speech recognition, video relay and remote interpreting services, screen readers that stream content, and accessible digital curricula all depend on reliable, high capacity connections both to and within schools and libraries.

A finding that connectivity is "good enough" for the general population can mask the reality that it is not sufficient for these uses. If the Commission narrows category one or category two support, or reduces support for internal connections and Wi-Fi, the students most likely to lose meaningful access are those who need the most from the network. We urge the Commission to weigh this consequence before concluding that the program's core objective has been achieved. For a student who communicates through a cloud based AAC device, the difference between adequate bandwidth and inadequate bandwidth is the difference between having a voice in class and having none.

B. Screen Time Limits Must Exempt Assistive Technology and Accessibility Use

The NPRM asks whether E-Rate funding should be conditioned on screen time limits and whether per day limits on device use should be imposed. We understand the concern about excessive recreational screen use. We ask the Commission to recognize that a large and growing share of "screen time" for students with disabilities is not recreational and is not optional. It is the accommodation itself.

A student with dyslexia may rely on text to speech to read any assignment. A student who is blind or has low vision uses a screen reader or magnification for every task. A nonspeaking student communicates through an AAC app on a tablet for the entire school day. A student with a physical disability may use word prediction, switch access, or eye gaze to produce any written work. For these students, a blanket cap on screen use, or a filter that limits screens to a set number of hours, would directly restrict a federally protected accommodation under the Individuals with Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act (ADA).

If the Commission proceeds with any screen time framework, we ask that it do two things. First, it should expressly exempt assistive technology and accessibility use from any limit, whether measured by hours, content, or filtering. Second, where a student has an Individualized Education Program (IEP) or a Section 504 plan that governs device use, the Commission should defer to that plan. The team that writes these plans, which includes the parents, is far better positioned than the Commission or a filter to decide how much and what kind of device use a particular child needs.

We would also caution against relying on a filtering mechanism to enforce screen time limits. Filters that throttle or block by time or category frequently cannot distinguish an AAC session from recreational browsing. The practical result is that the student who most needs the device is the one the filter shuts off.

C. CIPA Reinterpretation, Network Level Filtering, and Third Party Devices Raise Serious Accessibility Concerns

The NPRM seeks comment on whether Child Internet Protections Act (CIPA) should be read to reach third party owned devices, whether schools should prevent such devices from connecting, and whether technology protection measures should filter at the network level. Each of these questions has significant disability implications that we ask the Commission to consider.

Students with disabilities frequently bring personally owned assistive technology to school and to libraries. A nonspeaking student's dedicated AAC device is often

purchased by the family or funded through Medicaid, the IDEA, or an Assistive Technology Act acquisition activity, and it is configured specifically for that student. A student may bring a personal tablet, hearing assistive device, or specialized input device that is essential to communication and learning. A rule that permitted or encouraged schools and libraries to block third party devices from connecting to E-Rate-funded networks could sever a student from the one device that lets them communicate and engage with their surroundings. We urge the Commission not to adopt any rule that would bar personally owned assistive technology from connecting, and to ensure that any policy on third party devices includes a clear path for these devices to connect.

Network level filtering raises a parallel concern. Filters that operate at the network level, and that apply uniformly to every device, **are notorious for over blocking**. They can interfere with assistive technology that streams content, block accessibility related websites and disability resources, and disrupt AAC and captioning services that rely on outside servers. If the Commission moves toward network level filtering, we ask that it require, as a condition, that any technology protection measure be compatible with assistive technology and not block content or services solely because they are delivered through an accessibility tool. The Commission should ensure that E-Rate-supported network equipment, filtering systems, security tools, and other technology purchased or deployed by schools and libraries are interoperable with commonly used assistive technologies and do not create barriers to accessibility. We also ask the Commission to recognize that the local authorities charged under CIPA with determining what is inappropriate for minors are the appropriate bodies to build in these accommodations, and that federal filtering mandates would make local flexibility harder to preserve.

Finally, the NPRM asks about defining "monitoring the online activities of minors." We ask the Commission to be mindful that assistive technology, and AAC in particular, can capture a student's private communications and personal expression. Monitoring requirements should be crafted so they do not surveil a nonspeaking student's use of their communication device more intrusively than a speaking student's ordinary conversation, or otherwise subject students who use assistive technology to greater monitoring than similarly situated students. Any monitoring requirement should account for the unique privacy and communication needs of students who rely on assistive technology and should not make the use of an accessibility tool a basis for increased surveillance.

Libraries also serve children and adults with disabilities who rely on library technology for communication, education, employment, and access to information. Public libraries may provide computers, broadband, accessible digital resources, screen readers,

magnification software, and other assistive technologies that patrons with disabilities rely on to participate in their communities. The Commission should ensure that any changes to CIPA requirements, network filtering, or E-Rate-supported technology do not prevent library patrons with disabilities from accessing these tools and resources. Filtering and other technology protection measures should not block disability-related websites, communication tools, accessible educational materials, or other content solely because a patron accesses them through assistive technology.

D. Head Start and Pre-Kindergarten Funding Is Critical for Young Children With Disabilities

The NPRM asks whether Head Start and pre-kindergarten students should continue to receive E-Rate support, and cites expert guidance that very young children should sharply limit screen use. We share the goal of protecting young children, but we ask the Commission to recognize the critical and beneficial use of assistive technology and early intervention delivery in early years for children with disabilities.

For a young child with a communication, sensory, motor, or cognitive disability, appropriate technology introduced early can shape their entire developmental trajectory. Early AAC use, accessible early learning tools, and connectivity that supports tele-intervention and specialist consultation all depend on the connected environment these programs provide. A rule that costs allocated Head Start and pre-kindergarten children out of the program, or removed their eligibility, risks cutting off young children with disabilities at the point where support matters the most. We urge the Commission to retain eligibility for these facilities and students, and, at a minimum, to avoid any screen time rationale that treats a disabled child's necessary early AT use as harmful screen time.

E. "Educational Purpose" Should Expressly Include Assistive Technology and Accessibility Use

The NPRM asks how to ensure that E-Rate funded networks are used for "educational purposes," and whether some uses fall outside that definition. We ask the Commission to confirm that use of E-Rate funded networks and services for assistive technology and accessibility is an educational purpose under the Communications Act. When a student uses the network to run a screen reader, operate an AAC device, receive captioning, or access an accessible version of the curriculum, that use is not incidental to education. It is education. **Any definition or guidance the Commission adopts should say so plainly,** so that schools and libraries are not left uncertain about whether serving students with disabilities counts.

F. CIPA Public Notice, Hearings, and Policies Should Be Accessible

The NPRM asks how schools and libraries should provide public notice and hold public hearings on internet safety policies, and whether those policies should be made public. We support strong public engagement. We ask the Commission to add one requirement that costs little and matters greatly. Public notices, public hearings or meetings, and any published internet safety policies should be accessible to people with disabilities, consistent with the ADA and Section 504. That means accessible formats for notices and policies, and accessible meetings for parents and guardians who themselves have disabilities. Parents of children with disabilities have a direct stake in these policies, and they cannot participate if the process itself is inaccessible.

IV. Conclusion

These undersigned CCD organizations share the Commission's interest in protecting children and utilizing limited funds efficiently. We ask the Commission adopt these recommendations that pertain to internet access and the use and access to assistive technology. Assistive technology is how millions of students and library patrons with disabilities read, write, speak, and learn. The Commission should make certain that its efforts to protect children, strengthen program integrity, and reexamine the program's scope do not come close to taking those tools away – but even consider expanding the access to these tools.

We thank the Commission for the opportunity to comment and welcome any follow up.

Sincerely,

Access Ready Inc

Allies for Independence

American Association of People with Disabilities

American Music Therapy Association

American Therapeutic Recreation Association

Assistive Technology Industry Association (ATIA)

Association of Assistive Technology Act Programs

Autism Society of America

Autistic Self Advocacy Network

Autistic Women & Nonbinary Network

CommunicationFIRST

Council for Exceptional Children
Council for Learning Disabilities
Council of Parent Attorneys and Advocates (COPAA)
Deaf Equality
Easterseals, Inc.
Family Voices NJ
National Center for Learning Disabilities
National Disability Rights Network (NDRN)
National Rehabilitation Association
Perkins School for the Blind
SPAN Parent Advocacy Network
The Advocacy Institute
The Arc of the United States
The Partnership for Inclusive Disaster Strategies