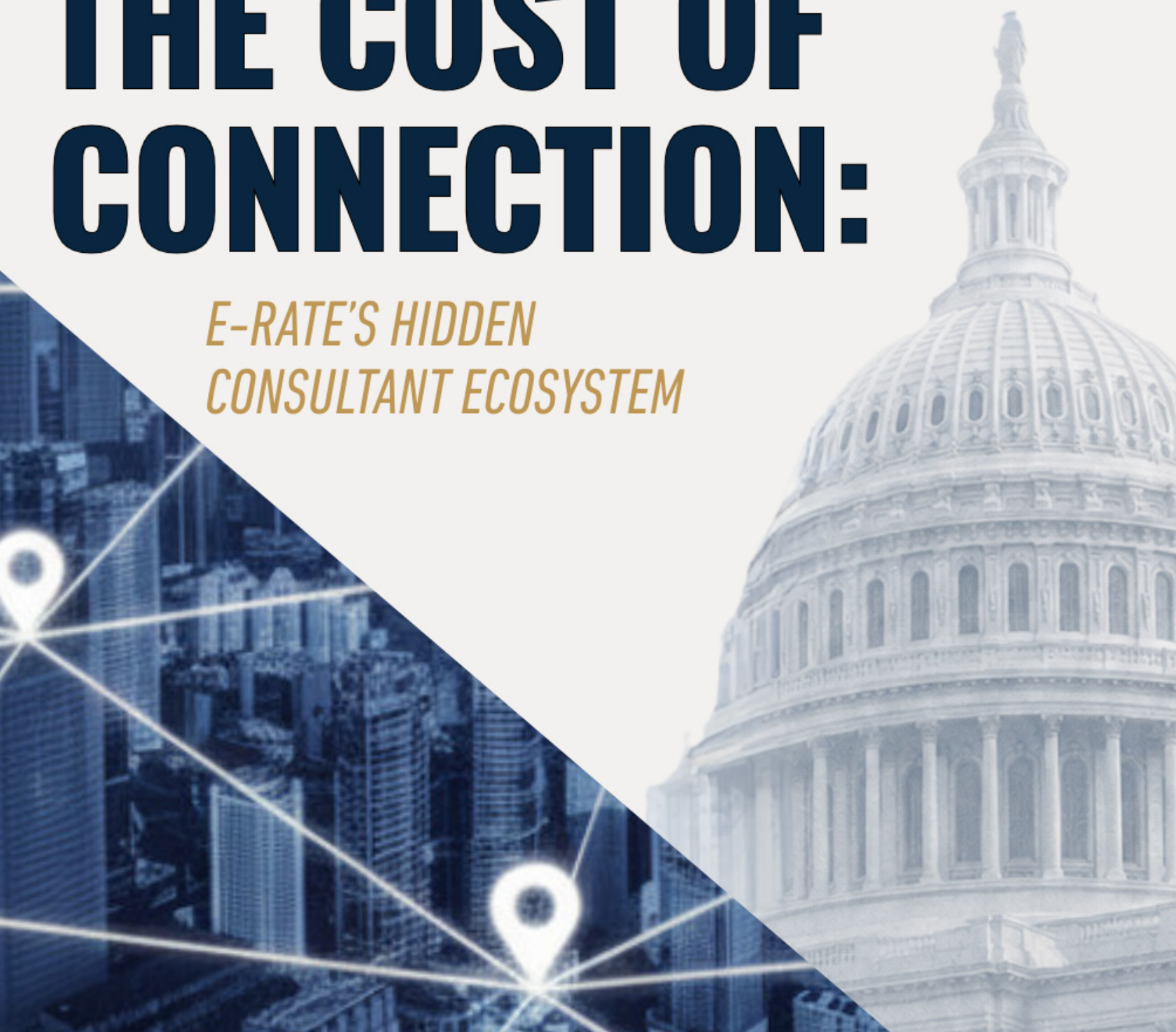




U.S. SENATE COMMITTEE ON
**COMMERCE, SCIENCE,
& TRANSPORTATION**
CHAIRMAN TED CRUZ

THE COST OF CONNECTION:

*E-RATE'S HIDDEN
CONSULTANT ECOSYSTEM*



Executive Summary

In 1996, Congress directed the Federal Communications Commission (FCC) to ensure that schools and libraries could obtain advanced telecommunications services at affordable rates. The FCC subsequently established the E-Rate program to carry out that mandate. Three decades later, E-Rate spends between \$2 billion and \$3 billion each year on subsidized internet service and network infrastructure—and has developed into a complex system with intermediary consultants who consume hundreds of millions of dollars annually just to assist in *accessing* federal support for internet bills.

Committee staff estimates that consultants are associated with approximately 82 percent of E-Rate funding, by dollar value, and receive between \$200 million and \$400 million annually to assist applicants in obtaining program support. These consultants generally do not provide the internet service or build the network infrastructure subsidized by E-Rate. Instead, they help applicants comply with a byzantine process that has become a costly feature of the program.

This report examines the consultant ecosystem surrounding E-Rate, the incentives that sustain it, and the implications for program costs, transparency, and oversight. It offers three key findings:

1. **Consultant reliance is structural, not incidental, to E-Rate’s design.** The program’s multistep and technical requirements push schools and libraries to hire outside firms to prepare filings, conduct bidding, and manage compliance. Yet, consultant compensation is difficult to evaluate, with limited transparency, price discipline, and accountability.
2. **Consultant prices vary substantially across districts and service arrangements.** Committee staff found, for example, the District of Columbia Public Schools pays substantially more per student for E-Rate consulting than neighboring Fairfax County Public Schools. In another example, Milwaukee Public Schools entered into a nearly \$800,000 contract for three years of consulting services, or on average over \$250,000 annually. Districts and consultants cite differences in service levels and procurement structures, but these disparities underscore the absence of consistent pricing benchmarks across the program.
3. **E-Rate’s subsidy structure weakens normal incentives to control costs.** Because E-Rate can cover up to 90 percent of connection costs, applicants often pay only a small share of the total price. Committee staff’s analysis suggests that, in higher subsidy environments, average internet service costs tend to be higher. This pattern is not unique to E-Rate. In other government-subsidized markets, including the Affordable Connectivity Program and certain Medicaid financing arrangements, third party payment structures can reduce price sensitivity and result in public funds paying higher prices or intermediary costs.

The core question is straightforward: is E-Rate solving today’s connectivity needs, or sustaining a complex intermediary system built for a different era? This question is especially timely as the FCC undertakes a comprehensive review of E-Rate’s procurement rules, governance structure, and continued role in an era of widespread connectivity. This report should inform that review and prompt greater scrutiny of how E-Rate funds move, who benefits, and whether the program’s current structure delivers value to schools, libraries, and taxpayers.





Introduction

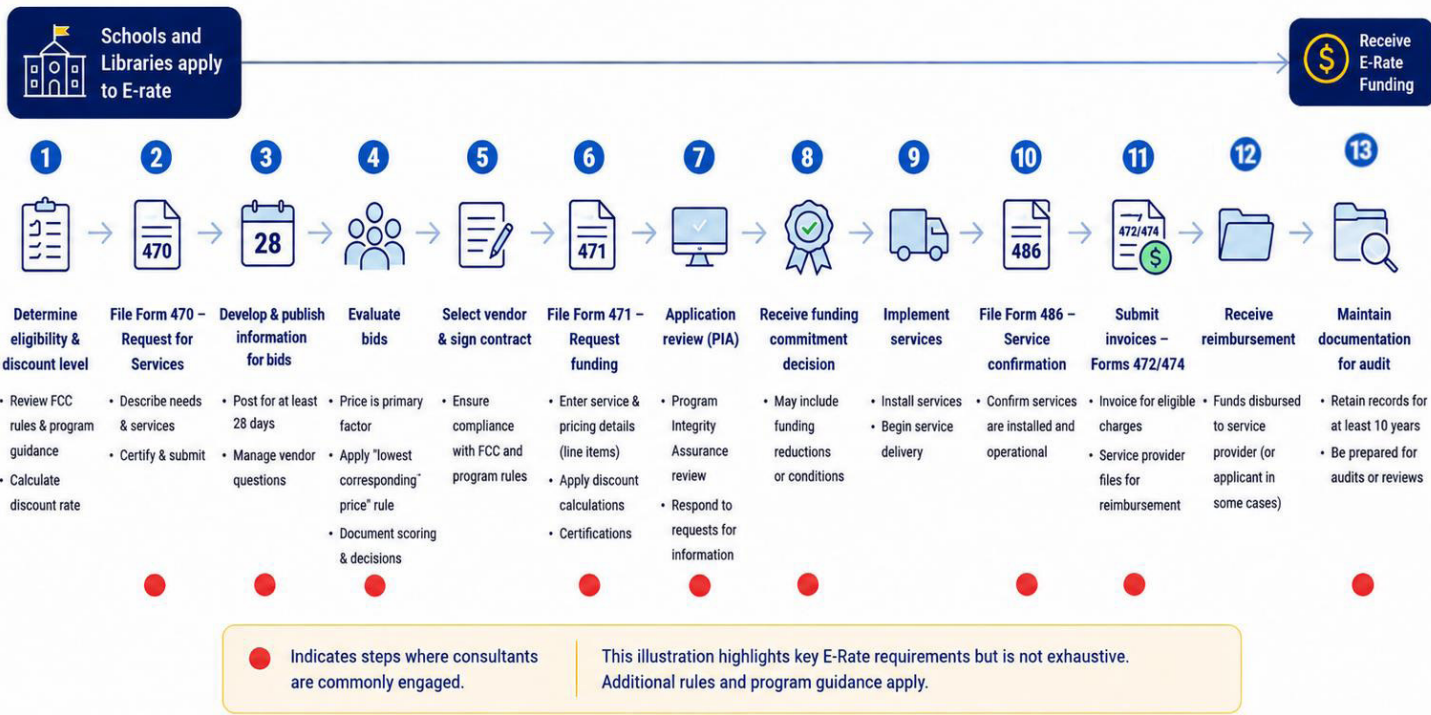
The E-Rate program, formally known as the schools and libraries universal service support mechanism, grew out of Congress’s 1996 directive that the Federal Communications Commission (FCC) help schools and libraries obtain affordable access to advanced telecommunications and information services.¹ The FCC established E-Rate in 1997.² Through the program, schools and libraries receive funding for internet service, as well as for internal networks needed to distribute the internet within schools and libraries. When E-Rate was established, internet access was limited and costly. Over the past three decades, however, internet connectivity has become widespread and costs have declined significantly.³

The FCC sets the program’s rules and funding parameters, including discounts that cover a substantial share of eligible costs. These discounts range from 20 to 90 percent and are based primarily on the percentage of an applicant’s students who are eligible for the National School Lunch Program, a federally assisted meal program.⁴ As a result, the federal government typically pays a large share of the bill.⁵

The Universal Service Administrative Company (USAC) administers the program by processing applications, verifying eligibility, and issuing payments either to applicants or service providers.⁶ While the underlying transaction is straightforward, obtaining E-Rate funding requires navigating a complex, multi-step process involving competitive bidding, application filings, funding approvals, invoicing, reimbursement requests, and ongoing compliance requirements. Applicants must conduct a formal competitive bidding process through FCC Form 470, observe a mandatory 28-day waiting period before selecting a vendor, and satisfy a series of procedural requirements that extend well beyond a typical internet purchase before selecting a vendor.⁷ The figure below provides an illustration of how the process expands.

Accessing E-Rate: A Multi-Step Compliance Process

Applicants must complete multiple forms and meet program requirements before receiving funding.
Consultants are commonly engaged at several points in the process.



Source: Graphic created by Committee staff using information from Universal Service Administrative Company (USAC) website

The complexity of the E-Rate application process leads many schools and libraries to hire specialized consultants who can navigate the FCC’s multi-step compliance process for federal funding. However, as noted in a 2020 Government Accountability Office (GAO) report, consultants can “exert great influence” over the E-Rate process, enabling them to shape an applicant’s spending and procurement decisions.⁸ Currently, consultants are not directly overseen by the FCC or USAC, creating a regulatory gap that prompts concerns about transparency, accountability, and program integrity.

The Consultant Ecosystem

MARKET STRUCTURE AND SCALE

Consulting firm Funds For Learning estimates that approximately 96 percent of U.S. public schools participate in the E-Rate program, underscoring the program’s broad reach throughout public education.⁹ The complexity of the E-Rate application process has produced a consultant-driven ecosystem that shapes how billions in federal funds are distributed. In 2025, approximately 82 percent of approved funding—more than \$1.9 billion of the roughly \$24 billion total—involved a consultant.¹⁰ Altogether, across the program, consultants likely earn between \$200 million and \$400 million annually.¹¹ What began as assistance navigating the program’s requirements has evolved into a substantial parallel industry funded indirectly through the program itself. Although consultant fees are not an allowable expense under program rules, institutions can use program funds to offset other expenses, indirectly freeing up resources for consulting payments.¹²

From the program’s inception, firms emerged to help applicants navigate its requirements, and today more than 500 consulting firms are associated with E-Rate applications.¹³ In 2025, just ten firms were associated with nearly \$900 million in approved funding—more than 38 percent of all E-Rate dollars that year.¹⁴ Meanwhile, over 80 percent of consultants were associated with less than \$1 million in approved funding, reflecting a fragmented long tail of small firms operating around the program.¹⁵

Top 10 Consultants by Approved E-Rate Funding, 2025

	NAME OF CONSULTANT	STATE	APPROXIMATE APPROVED FUNDING
1	CSM Consulting Inc.	California	\$196,000,000
2	E-Rate Central	New York	\$159,000,000
3	Southeast Regional Resource Center (SERRC)	Alaska	\$157,000,000
4	Funds for Learning	Oklahoma	\$117,000,000
5	VST Services LP	Texas	\$57,000,000
6	Adtec Administrative and Technical Consulting	Indiana	\$45,000,000
7	Kellogg & Sovereign Consulting	Texas	\$44,000,000
8	E_RATE ONLINE LLC	Connecticut	\$39,000,000
9	Infinity Communications & Consulting	California	\$38,000,000
10	E-Rate Elite Services, Inc.	Maryland	\$36,000,000

Note: Dollar amounts have been rounded to the nearest million. Source: USAC E-Rate Invoice Disbursement Data.

CONSULTANT CONFLICTS OF INTEREST

Some consultants operate well beyond individual applications, influencing procurement structures, FCC policy debates, and the interpretation of E-Rate rules. In some cases, consultants advocate for policy changes that directly affect the size and structure of the program from which they earn revenues.

For example, California-based firm CSM Consulting Inc.—the consulting firm associated with nearly \$200 million in approved funding (the largest amount in 2025)—has advocated before Congress, alongside the Schools, Health, and Libraries Broadband Coalition (SHLB), for expanding E-Rate funding while opposing efforts to narrow or reconsider the program’s scope.¹⁶ SHLB, whose membership includes consultants and firms that sell services to E-Rate participants, has opposed recent FCC reforms to the competitive bidding process, arguing that the creation of a centralized bidding portal intended to reduce fraud “would create excessive burdens.”¹⁷

Consultants and program advocates also serve on the board of USAC, the private nonprofit responsible for administering E-Rate and other Universal Service Fund (USF) programs. The 20-member board provides guidance on the administration of the USF’s approximately \$8.4 billion annual budget.¹⁸ Of the current eighteen directors (there are two vacancies), fifteen are affiliated with organizations that participate in, receive support from, provide services through, or advocate on behalf of participants in USF programs. Of these fifteen, eight are associated with program beneficiaries, consulting firms, broadband providers, or advocacy organizations connected to the E-Rate program.¹⁹ As a result, entities with a direct financial stake in USF programs help shape their administration and funding. In the case of E-Rate, nearly half of the board’s members have a financial interest in the program. This structure raises questions, consistent with FCC’s current review, about whether existing governance mechanisms adequately guard against conflicts of interest and ensure that program decisions are made in the interests of taxpayers and the program as a whole.²⁰

PRICING AND COMPENSATION MODELS

Despite handling billions in subsidized funding, the financial structure of the E-Rate consulting market receives little public scrutiny. Consultant compensation in the E-Rate program is not centrally tracked, limiting visibility into how fees are structured. Committee staff reviewed more than 140 publicly available consulting agreements and found that many schools that use consultants pay between \$5,000 and \$15,000 per year for their services.²¹ At the upper end, some districts pay more than \$100,000 annually for E-Rate consulting services with total contract costs approaching \$1 million over the life of an agreement.

In certain agreements, consultant compensation increases alongside the size of funding requests, linking consultant revenue to larger subsidized projects. The following examples, drawn from the contracts reviewed by committee staff, demonstrate wide disparities in consulting costs across districts despite schools often seeking assistance for similar administrative functions.

CASE STUDY 1: SAME CONSULTANT, DIFFERENT PRICES

Consulting costs can vary significantly even across neighboring districts using the same E-Rate consultant. For example, neighboring District of Columbia Public Schools (DCPS) and Fairfax County Public Schools (FCPS) both contracted with the same consulting firm, Funds for Learning, yet paid significantly different rates.

Under currently active agreements covering similar time periods, DCPS entered into a series of annual contracts with Funds for Learning to support its E-Rate applications, with payments escalating from approximately \$129,500 to \$135,500.²² By contrast, FCPS contracted with the same firm under a multi-year agreement spanning 2019 to 2027²³, with annual payments for base-level services ranging from \$33,125 to \$45,750 and additional services offered as optional add-ons.²⁴

The pricing disparity is particularly striking given the differences in district size. DCPS serves roughly 52,000 students, while FCPS—one of the largest school districts in the country—serves more than 177,000 students.²⁵

Committee staff spoke with officials from DCPS and Funds for Learning. DCPS officials said the consulting costs were justified by citing the district’s annual E-Rate support, which averaged approximately \$3.6 million to \$4.5 million per year. They noted that consultant fees represented only a small fraction of total federal funding received. DCPS officials also explained that the district operates under a citywide internet services arrangement that differs from a traditional public procurement model, adding complexity to the E-Rate application process because the arrangement is subject to increased scrutiny of the competitive bidding process.

Funds for Learning stated that DCPS required more extensive assistance navigating the E-Rate process, while FCPS used the firm on a more limited, as-needed basis to supplement its internal procurement team. However, even accounting for these distinctions, the disparity—within the same region and involving the same consultant—illustrates the absence of clear pricing benchmarks within the E-Rate consulting market. At the upper end, annual consulting fees exceeding \$135,000 rival the cost of a full-time employee. This raises broader questions about whether the program has effectively created a parallel administrative layer around E-Rate.

CASE STUDY 2: LARGE CONSULTING COSTS IN A LONG-SUBSIDIZED DISTRICT

Milwaukee Public Schools recently entered into a three-year, approximately \$800,000, contract for E-Rate consulting services with EdTech Strategies, LLC.²⁶ The district serves roughly 65,000 students across 150 schools²⁷ and reported receiving more than \$115 million in E-Rate funding commitments between 2003 and 2025.²⁸

The scale of both the consulting contract and the district’s historical E-Rate support raises broader questions about the long-term structure of the program. Milwaukee Public Schools has participated in E-Rate for more than two decades and has received more than \$115 million in funding commitments during that period. The continued need for significant consultant support raises questions about the extent to which long-term participants remain dependent on outside expertise to navigate the program. More fundamentally, the case illustrates a policy question facing the program: if a district has already received decades of support intended to achieve universal connectivity, at what point should E-Rate support begin to phase down or end?

CASE STUDY 3: PERCENTAGE-BASED FEES AND HYBRID PRICING STRUCTURES

Some E-Rate consulting agreements go beyond flat annual fees and instead tie compensation directly to the amount of funding secured. Among the contracts reviewed, fee structures ranged from low single-digit percentages to double-digit shares of a total award.

For example, the Decatur Public School District in Illinois entered into an agreement with K12 Consultants to provide E-Rate consulting for ten percent of expended E-Rate funding.²⁹ The arrangement ultimately resulted in nearly \$40,000 in consultant compensation. Under structures like this one, consultant compensation increases alongside total project costs, creating a financial incentive to maximize funding requests. Committee staff spoke with Decatur officials, who stated that the district collects on average \$1 million annually through the E-Rate program and retains a consultant to ensure they receive this funding. According to the officials, the federal subsidy provides an 85-percent discount that primarily covers the district’s internet connectivity costs.

Other agreements use hybrid pricing structures that partially tie consultant compensation to the size of funding commitments, creating similar incentives to favor larger funding requests. In one instance, Educational Funding Group charged the Willoughby-Eastlake School District in Ohio a flat annual fee of \$6,100 or nine percent of disbursed E-Rate funding, with compensation set at whichever amount was higher.³⁰ In another instance, E-Rate consultant CSM Consulting Inc. charged Baldwin Park Unified School District in California a \$26,000 flat fee for E-Rate funding support and six percent of the funds requested for internal network infrastructure, not to exceed \$46,000 annually.³¹

Unlike flat fee arrangements, percentage-based fees and hybrid pricing structures reward consultants for higher project expenditures, creating a financial incentive to favor larger funding requests and more expensive projects over more cost-effective solutions.

INCENTIVES AND COST IMPLICATIONS

Beyond the direct cost of consultant fees, E-Rate’s reimbursement structure may also affect program spending and procurement incentives. Using calendar-year 2025 USAC invoice data, Committee staff compared the reported pre-discount eligible amounts for Category One—which represents the cost of internet service—by E-Rate discount rates—which is the percent of the internet service cost paid by the federal government. In practical terms, this is the total cost of internet service before application of the E-Rate discount.

Committee staff found the pre-discount cost of internet service was substantially higher among schools receiving the highest E-Rate discounts. The median cost for internet services for schools with discount rates above 80 percent was \$1,854—more than twice the \$805 median for schools receiving discounts of 20 to 25 percent. The same pattern appeared among consultant-associated lines: the median pre-discount amount increased from \$805 to \$1,891. Average pre-discount amounts showed an even larger disparity, see Appendix I Methods and Data.



2025 Internet Service Costs by E-Rate Discount Rate and Consultant Involvement

FEDERAL REIMBURSEMENT	MEDIAN NO CONSULTANT	MEDIAN WITH CONSULTANT	PERCENT DIFFERENCE
20-25%	\$805	\$805	0
40%	\$950	\$1,000	5%
50%	\$899	\$1,133	26%
60%	\$1,365	\$1,430	5%
70%	\$1,176	\$1,340	13%
80%	\$1,725	\$1,687	-2%
>80%	\$1,854	\$1,891	2%

Note: This table includes Category One internet service invoice lines authorized for disbursement during calendar year 2025. It excludes Category Two equipment and internal-connection projects. Source: USAC E-Rate Invoice Disbursement Data.

These differences do not directly establish that higher E-Rate discounts cause higher prices or spending. A more comprehensive analysis would need to account for service level, applicant size, geography, purchasing volume, and other factors that may affect eligible costs. Nor do these results establish that consultants increase underlying costs; at several discount levels, median amounts were similar for consultant-associated and non-consultant invoice lines. Nevertheless, the observed pattern is consistent with established economic theory regarding third-party payment systems and reduced price sensitivity and warrants further review.

This pattern is not unique to E-Rate. In other subsidized environments, including the Affordable Connectivity Program and certain Medicaid financing arrangements, third-party payment structures can reduce price sensitivity, increasing the risk that public funding supports higher prices or intermediary fees.³² While the specific mechanisms differ, the underlying incentive is similar: when recipients bear little of the cost, incentives to negotiate for the best price are diminished. When the federal government bears most of the cost, applicants may have less incentive to minimize total eligible cost. Applicants receiving a 90 percent E-Rate discount pay only 10 cents on the dollar for eligible services, reducing the direct financial impact of higher overall costs.

OVERSIGHT AND RISK

Despite their central role in helping E-rate applicants obtain billions in federal subsidies, consultants operate with limited oversight. FCC rules acknowledge their participation and impose certain conduct restrictions, such as prohibitions on the solicitation or acceptance of gifts from service providers.³³ However, current FCC rules do little to govern how consultants are compensated or address inherent conflicts of interest. As a result, consultant compensation structures can reward higher spending rather than cost control, particularly when fees are tied to funding levels or procurement size. These incentive structures, combined with limited transparency and decentralized procurement, have repeatedly created opportunities for fraud, bid manipulation, and inflated pricing arrangements.³⁴

E-Rate Fraud and Abuse

Department of Justice prosecutions and enforcement actions over the past two decades reveal recurring patterns in E-Rate fraud schemes. Across these cases, three mechanisms appear repeatedly: manipulation of the competitive bidding process, consultant-driven steering of contracts, and false or inflated billing for services. These schemes often involve multiple actors and persist for years while appearing compliant on paper.

Although the following cases represent only a small portion of total E-Rate activity and are not intended to be representative, they illustrate vulnerabilities that have recurred across administrations, geographic regions, and types of program participants.

- 2004: A group of related consultants obtained more than \$1.2 million by submitting applications for goods and services that were never delivered to schools in the Milwaukee and Chicago areas. Proceeds were laundered through a series of transactions, including wiring more than \$600,000 to Pakistan, purchasing a residence in Wisconsin, and acquiring several automobiles. Key individuals ultimately pleaded guilty.³⁵
- 2010: Hewlett-Packard paid \$16.25 million to resolve allegations that the company and its partners secured E-Rate contracts in Dallas and Houston by providing improper inducements—such as the use of yachts and event tickets—to school officials during the bidding process. The case resulted in criminal bribery convictions and prison sentences for several participants.³⁶
- 2020: Seven defendants in New York—including vendors, consultants, and a school official—pleaded guilty in a multimillion-dollar scheme involving billing for equipment and services that were never delivered, inflated technology purchases, and sham “independent” consultants secretly controlled by vendors. This case resulted in criminal convictions and prison sentences for all participants.³⁷
- 2026: The CEO of E-Rate Consulting LLC pleaded guilty to conspiracy to defraud the United States in connection with a separate COVID-era FCC program that supported internet access for schoolchildren.³⁸ According to USAC data from 2016 to 2025, the firm served as the consultant for dozens of school districts across more than a dozen states, facilitating over \$8 million in approved E-Rate reimbursements.³⁹

Taken together, these cases illustrate a recurring structural problem: consultants often operate at the center of the application and procurement process with limited transparency into compensation arrangements and vendor relationships. In practice, oversight relies heavily on paperwork submitted by the same parties seeking federal funding, making it more difficult to identify bid manipulation, kickbacks, and inflated pricing arrangements to persist for years before detection.

RECENT FCC ACTION

In June 2026, the FCC initiated a proceeding to comprehensively review the E-Rate program, including assessing whether its scope should be narrowed to reflect today’s widespread connectivity, whether support should be targeted through a need-based model, and whether additional safeguards are needed to ensure procurement decisions are driven by the needs of schools rather than the interests of service providers and consultants.⁴⁰ The proceeding also seeks to enhance FCC and USAC oversight of consultants by considering whether to prohibit percentage-based compensation arrangements that tie consultant compensation to the amount of E-Rate funding received and whether to require consultants to register in a database to increase visibility into which individuals are assisting with specific applications.⁴¹

Separately, the FCC recently adopted new rules that, beginning in Fiscal Year 2028, will require prospective service providers to submit bids through a USAC-run portal and require applicants to upload all bid evaluation materials and contracts after selecting a provider.⁴² The Commission is also considering a standardized bid response template intended to improve transparency and simplify bid comparisons.⁴³ These proposals build on recommendations made by the FCC Office of Inspector General since 2017 following findings by the GAO and internal USAC risk assessments identifying a lack of visibility into the bidding process.⁴⁴

Further, the FCC has also sought comment on preventing conflicts-of-interest on the USAC Board, including whether the Commission should adopt new conflict-of-interest rules, prohibit certain individuals or entities from serving, and require board members to act in the interests of USF rather than their personal employer or constituency.⁴⁵

Collectively, these proceedings suggest that many of the concerns identified in this report—including procurement transparency, consultant influence, governance conflicts, and the continued scope of the program—are under active review by the Commission. The FCC’s ongoing efforts present an opportunity to simplify program administration, strengthen oversight, and better align E-Rate with today’s connectivity needs.

Conclusions and Policy Recommendations

The E-Rate program was created to solve significant gaps in connectivity across America’s schools and libraries. When E-Rate was implemented in 1997, internet access in schools was limited, expensive, and far from ubiquitous. Today, access is widespread. In 2019, EducationSuperHighway reported that approximately 99 percent of schools had sufficient infrastructure to meet federal connectivity standards, declaring the “classroom connectivity gap is closed.”⁴⁶ Meanwhile, the cost of internet access has declined significantly since 1997, with EducationSuperHighway citing a 90-percent decline in school internet costs between 2013 and 2019 due to increased price transparency and technological advancements.⁴⁷ By its original measure, E-Rate succeeded.

Rather than winding down after achieving its original objective, the program has grown more complex and more consultant-driven while continuing to be vulnerable to waste, fraud, and abuse. In a 2025 report surveying E-Rate participants, one respondent noted that the program’s complexity is, “forcing many to pay for consulting assistance,” thereby “minimizing the actual benefit of the program itself,” by diverting funds away from connectivity needs.⁴⁸

Committee staff findings indicate that the program’s structure can weaken price discipline, obscure costs, and create perverse incentives that reward higher spending rather than cost control. Significant resources now flow not only to connectivity, but to navigating the program itself.

This raises a basic question: if near-universal connectivity has been achieved, is E-Rate in its current form addressing today’s needs, or sustaining a system built for a bygone era? The burden should now be on proponents of the current structure to demonstrate that its complexity, costs, and intermediary consultant ecosystem continue to deliver commensurate value to schools, libraries, and taxpayers.

RECOMMENDED CHANGES FOR THE FCC

1. Simplify program rules to reduce reliance on consultants and limit opportunities for waste, fraud, and abuse. The FCC should evaluate whether funding eligibility can be determined directly using existing enrollment and student-poverty data, reducing reliance on the current application and reimbursement process.
2. Require public disclosure of consultant compensation associated with E-Rate.
3. Stop further expansion of E-Rate, including pilot programs, until the program’s core vulnerabilities are addressed.
4. Reform USAC’s Board of Directors to prohibit individuals and entities that have a direct financial incentive in USF programs from serving on the board, limiting the opportunities for conflicts of interest.

LEGISLATIVE CHANGES

Congress should reexamine the schools and libraries provisions of the Telecommunications Act of 1996 to reflect today’s connectivity environment. As school connectivity has become nearly universal, the rationale for maintaining a large and permanent subsidy program warrants renewed scrutiny, particularly as USF contribution rates continue to rise. The USF contribution factor—a fee borne by consumers through charges on their phone bills—reached a record 42 percent in October 2026, making scrutiny of the program particularly timely.⁴⁹

First, Congress should reassert its authority over the USF and clarify the statutory limits of the E-Rate program. This includes limiting the FCC’s ability to expand the program beyond its core purpose through pilot programs or administrative reinterpretation of “universal service”.

In recent years, advocacy groups and program beneficiaries have pushed to expand E-Rate funding beyond traditional school connectivity, including proposals to support Wi-Fi hotspot lending,⁵⁰ internet access on school buses,⁵¹ and cybersecurity initiatives.⁵² Rather than continually expanding a mature subsidy program, Congress should reassess whether the approximately \$2 to \$3 billion spent annually through E-Rate remains the most effective use of federal resources for students and taxpayers.

Chairman Cruz has consistently opposed efforts to expand the E-Rate program beyond its statutory purpose. In 2025, he led a Senate resolution to nullify a Biden-era FCC rule that would have allowed the distribution of Wi-Fi hotspots to students, an unlawful expansion of the program.⁵³ The resolution passed the Senate, and in September 2025, the FCC independently nullified this rule.⁵⁴ The House of Representatives can ensure the Wi-Fi hotspot program is permanently dead by passing the Senate-approved resolution.

Second, Congress should also consider bringing USF funding into the annual appropriations process. Doing so would strengthen congressional oversight, increase political accountability, and establish a regular mechanism for reviewing program spending and priorities.

Third, Congress should reconsider the program’s long-term funding structure. E-Rate was created when internet access was limited and expensive. Today, most schools already possess broadband infrastructure, while the cost of internet service has declined significantly. Congress should consider transitioning away from a perpetual reimbursement model toward a more targeted approach focused on high-cost and high-need schools. As connectivity becomes a routine operating expense rather than a deployment challenge, state and local governments should assume greater responsibility for ongoing service costs and upgrades. Such a transition would reduce administrative burdens, lessen reliance on consultants and intermediaries, and better align federal support with demonstrated need.



Appendix I: Methods and Data

CONSULTANT ASSOCIATION AND APPROVED-FUNDING ANALYSIS

Committee staff reviewed calendar year 2025 E-Rate funding data published by Universal Service Administrative Company (USAC) and matched funding requests to consultant information reported in E-Rate application records. The dollar value of funding associated with a consultant was calculated for the year and then divided by total E-Rate funding for the year. Based on this analysis, committee staff found that approximately 82 percent of E-Rate funding in 2025 was associated with consultant involvement. Consultant involvement reflects information reported in E-Rate application records and may not capture all outside assistance or fully distinguish between individual consultants, consulting firms, and related entities. Supporting calculations are maintained in committee staff files.

CONTRACT REVIEW AND CONSULTANT-MARKET ESTIMATE

To estimate annual payments to E-Rate consultants, committee staff reviewed 143 publicly available consultant agreements and related procurement documents obtained from school district websites, public contracting databases, school board materials, and other publicly accessible sources. Annualized flat-fee amounts varied substantially: among agreements for which staff could identify an annualized dollar amount, the median fee was \$10,500, with the middle half ranging from \$6,000 to \$26,000. Percentage-based and hybrid agreements generally tied some or all consultant compensation to E-Rate funding levels, with rates ranging from a minimum of 2 percent to a maximum of 40 percent.

The reviewed materials were not a random sample of all E-Rate consulting arrangements; rather, they reflect agreements and procurement records identified through publicly available online sources. Staff used these materials to identify common compensation structures and develop a reasonable range of consultant fees. Staff considered that range alongside the 2025 E-Rate funding associated with consultant-involved requests to estimate the size of the E-Rate consulting market. Together, these analyses support staff’s estimate that E-Rate consultants receive between \$200 million and \$400 million annually. This estimate may not capture all consulting arrangements or compensation structures. Supporting contracts, source documents, calculations, and analysis are maintained in committee staff files.



INVOICE-LINE COST ANALYSIS

For the invoice analysis, committee staff began with USAC data limited to school applicants. Staff excluded Category Two invoice entries and records with no reimbursed amount. The remaining Category One internet-service invoices records were grouped by E-Rate discount rate: 20–25 percent, 40 percent, 50 percent, 60 percent, 70 percent, 80 percent, and above 80 percent (including 86, 90, and 95 percent). Within each rate category, staff compared reported pre-discount eligible amounts for invoices associated with a consultant and those without consultant involvement. The analysis compares reported eligible amounts per invoice line, not standardized prices for comparable service packages or school systems. Differences may reflect service levels, billing frequency, applicant characteristics, and other unobserved factors. Supporting calculations are maintained in committee staff files.

2025 Internet Service Costs by E-Rate Discount Rate and Consultant Involvement

FEDERAL REIMBURSEMENT	MEDIAN NO CONSULTANT	MEDIAN WITH CONSULTANT	PERCENT DIFFERENCE	AVERAGE NO CONSULTANT	AVERAGE WITH CONSULTANT	PERCENT DIFFERENCE
20-25%	\$805	\$805	0	\$1,256	\$2,223	77%
40%	\$950	\$1,000	5%	\$2,671	\$2,963	11%
50%	\$899	\$1,133	26%	\$3,110	\$5,701	83%
60%	\$1,365	\$1,430	5%	\$4,633	\$5,625	21%
70%	\$1,176	\$1,340	14%	\$2,905	\$3,369	16%
80%	\$1,725	\$1,687	-2%	\$8,015	\$7,797	-3%
>80%	\$1,854	\$1,891	2%	\$11,611	\$12,267	6%

Note: This table includes Category One internet service invoice lines submitted for disbursement during calendar year 2025. It excludes Category Two equipment and internal connection projects.
Source: USAC E-Rate Invoice Disbursement Data.

Appendix II: USAC Board Conflicts of Interest

The Universal Service Administrative Company (USAC) has a 20-member board that provides guidance on the administration of the Universal Service Fund’s (USF’s) approximately \$8.4 billion annual budget. Committee staff reviewed the biographies of the directors to determine employer and organizational affiliations of the current eighteen directors (there are two vacancies). Fifteen are affiliated with organizations that participate in, receive support from, provide services through, or advocate on behalf of participants in USF programs. Of these fifteen, eight are associated with E-Rate program beneficiaries, which is further outlined for each of the directors below:

- Julie Tritt Schell, Vice Chair of the Board, is Senior E-Rate Advisor to the Pennsylvania Department of Education, as well as an E-Rate consultant with Julie Tritt-Schell Consulting.⁵⁵ Ms. Tritt Schell also served as Co-Chair of the State E-Rate Coordinators’ Alliance and the Schools, Health, and Libraries Broadband Coalition (SHLB) E-Rate Policy Group.⁵⁶
- Joan Wade, Treasurer of the Board, is Executive Director of the Association of Educational Service Agencies, which represents educational service agencies and advocates for the E-Rate program.⁵⁷
- Brian Dalhover, Board Member, is Vice President of SLED Engineering and Policy at Zayo Group, LLC, where he oversees Zayo’s educational public sector portfolio. Zayo is an internet service provider and one of the top E-Rate providers.⁵⁸
- Amber Gregory, Board Member, is Manager of E-Rate Services at the Arkansas State Library, where she assists public libraries in obtaining E-Rate funding.⁵⁹ Ms. Gregory is also a member of the American Library Association’s (ALA’s) E-Rate Task Force.⁶⁰ ALA is a library association that advocates for the E-Rate program.⁶¹
- Daniel Kettwich, Board Member, is founder, President, and CEO of ADS Advanced Data Services, Inc., an E-Rate consulting company.⁶²
- Alexander Minard, Board Member, is Vice President and Lead Legislative Counsel of NCTA—The Internet & Television Association, a trade association that represents cable broadband providers that receive payments through E-Rate.⁶³
- David Schuler, Board Member, is Executive Director at AASA (The School Superintendents Association), a professional association for educational leaders, that advocates for the E-Rate program.⁶⁴
- Angela Siefer, Board Member, is founder of the National Digital Inclusion Alliance, and serves on the Board of SHLB, an E-Rate advocacy group.⁶⁵

End Notes

¹ 47 U.S.C. § 254.

² See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd. 8776 (1997), <https://docs.fcc.gov/public/attachments/FCC-97-157A1.pdf>.

³ Chart posted by Mark J. Perry, (@Mark_J_Perry), X, *Chart of the Century* (Jan. 25, 2026), https://x.com/Mark_J_Perry/status/2015463505298878746; Email from Mark J. Perry, Scholar Emeritus at the Am. Enter. Inst., to Comm. Staff (Feb. 24, 2026) (providing an updated version of the *Chart of the Century* with added data on internet services and electronic information providers) (on file with Committee staff); EDUC. SUPERHIGHWAY, 2019 STATE OF THE STATES 8 (2019), <https://www.educationsuperhighway.org/wp-content/uploads/2019-State-of-the-States-Full-Report-EducationSuperHighway-1.pdf>.

⁴ U.S. GOV’T ACCOUNTABILITY OFF., GAO-20-606, TELECOMMUNICATIONS: FCC SHOULD TAKE ACTION TO BETTER MANAGE PERSISTENT FRAUD RISKS IN THE SCHOOLS AND LIBRARIES PROGRAM 19 (2020), <https://www.gao.gov/products/gao-20-606>.

⁵ *Id.*

⁶ *Id.* at 7–10.

⁷ *28-Day Waiting Period*, UNIVERSAL SERV. ADMIN. CO., <https://www.usac.org/e-rate/applicant-process/competitive-bidding/28-day-waiting-period/> (last visited Aug. 31, 2026).

⁸ See U.S. GOV’T ACCOUNTABILITY OFF., *supra* note 4, at 23.

⁹ Funds for Learning estimates that 96,416 of 100,083 public schools participated in E-Rate in 2025, based on a combination of National Center for Education Statistics data and participation information from its proprietary E-Rate Manager database. See John Harrington, *E-Rate Keeps Schools and Libraries Connected*, FUNDS FOR LEARNING (Sept. 10, 2025) <https://www.fundsforlearning.com/news/e-rate-keeps-schools-and-libraries-connected/>.

¹⁰ *E-Rate Invoice Disbursements Data Lookup Tool*, UNIVERSAL SERV. ADMIN. CO. OPEN DATA, <https://opendata.usac.org/E-Rate/E-Rate-Invoice-Disbursements-Data-Lookup-Tool/t3vg-gfse> (last visited Sep. 10, 2026). Committee staff reviewed 2025 E-Rate approved funding data published by USAC and matched approved funding requests to consultant information reported in E-Rate application records. The total dollar value of approved funding associated with a consultant was then divided by total approved funding for the year. Based on this analysis, Committee staff found that approximately 82 percent of approved E-Rate funding in 2025 was associated with consultant involvement. Supporting calculations are maintained in Committee staff files (Committee staff accessed USAC data and filtered by an “Invoice Line Completion Date” of 1/1/2025–12/31/2025 to determine disbursements paid in 2025).

¹¹ See, e.g., *id.* Committee staff reviewed more than 140 publicly available consultant agreements and related procurement documents obtained from school district websites, public contracting databases, board materials, and other publicly accessible sources. For further information on this analysis, see the Methods and Data Appendix.

¹² *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket No. 13-184, Order, at 10 note 5 (WCB Dec. 17, 2025), <https://www.usac.org/wp-content/uploads/e-rate/documents/resources/DA-25-1069A1.pdf>.

¹³ There were no “E-rate” consultants prior to the formation of the program; the Telecommunications Act of 1996 gave rise to the industry. Kellogg and Sovereign was established in 1996, E-Rate Central in 1997, and Funds for Learning in 1997. According to E-Rate Central’s website, the firm was established “for the sole purpose of helping schools, school districts, and libraries to successfully navigate the complex and time-consuming rules and procedures of the Federal E-Rate Program.” See *A Tribute to Our Founder Jane Kellogg*, KELLOGG & SOVEREIGN CONSULTING, <https://kelloggllc.com/about/jane-kellogg-tribute/> (last visited May 11, 2026); *About Us*, E-RATE CENTRAL, <https://perma.cc/8968-VTTX> (last visited Aug. 31, 2026); Membership Directory, Funds for Learning, Edmond Chamber of Com., https://cca.edmondchamber.com/funds-for-learning-__1_297_5381715_memberprofile.aspx? (last visited Aug. 31, 2026).

¹⁴ See note 10, *supra*.

¹⁵ *Id.*

¹⁶ *CSM in DC Advocating for E-Rate!*, CSM CONSULTING, INC. (Mar. 12, 2026), <https://www.csmcentral.com/post/csm-in-dc-advocating-for-e-rate/>; *SHLB Congressional Fly-In*, SCHS., HEALTH & LIBRS. BROADBAND COAL., <https://www.shlb.org/shlb-congressional-fly-in-2026> (last visited Sep. 1, 2026).

¹⁷ See SCHS., HEALTH & LIBRS. BROADBAND COAL., EX PARTE LETTER: WC DOCKET NO. 21-455 AND CC DOCKET NO. 02-6 (filed Apr. 15, 2026), <https://www.fcc.gov/ecfs/document/1041679830932/1>.

¹⁸ *Board of Directors*, UNIVERSAL SERV. ADMIN. CO., <https://www.usac.org/about/leadership/board-of-directors/> (last visited Sep. 1, 2026).

¹⁹ For further information, see the USAC Board Conflicts of Interest Appendix.

²⁰ See Maximizing Efficiencies in Universal Service Administration, 91 Fed. Reg. 55826 (Aug. 31, 2026) (to be codified at 47 C.F.R. pt. 54), <https://www.govinfo.gov/content/pkg/FR-2026-08-31/pdf/2026-17761.pdf>.

²¹ See note 11, *supra*.

²² D.C. PUB. SCHS., NEGOTIATED CONTRACT FOR GOODS AND/OR SERVICES: CONTRACT NO. GAGA-2022-C-0440 2–3 (Dec. 28, 2022), https://dcps.dc.gov/sites/default/files/dc/sites/dcps/page_content/attachments/GAGA-2022-C-0440%20Funds%20For%20Learning%20Contract.pdf; D.C. OFF. OF FISCAL STRATEGY, BILATERAL MODIFICATION: CONTRACT NO. GAGA-

2022-C-0440 MODIFICATION NO. 4 (Oct. 1, 2024), https://dcps.dc.gov/sites/default/files/dc/sites/dcps/page_content/attachments/AAaYawovi%27s%20Mod_GAGA-2022-C-0440-Modification%204_%20Funds%20for%20Learning_OY3_TWJsigned.pdf.

²³ *Contract Details: E-Rate Program Consulting Services*, FAIRFAX CNTY., <https://www.fairfaxcounty.gov/cregister/ContractDetails.aspx?contractNumber=4400009334> (last visited Sep. 1, 2026).

²⁴ FAIRFAX CNTY. PUB. SCHS., NOTICE OF AWARD: E-RATE PROGRAM CONSULTING SERVICES (Aug. 12, 2019), <https://www.fairfaxcounty.gov/cregister/DownloadPDF.aspx?AttachmentID=c9db9e1e-6ec8-470d-84d7-6837897fea26>.

²⁵ *About Us*, FAIRFAX CNTY. PUB. SCHS., <https://www.fcps.edu/about-fcps> (last visited Sep. 1, 2026); *DCPS at a Glance: Enrollment*, D.C. PUB. SCHS., <https://dcps.dc.gov/page/dcps-glance-enrollment> (last visited Sep.1, 2026).

²⁶ MILWAUKEE BD. OF SCH. DIRS., MINUTES OF THE MILWAUKEE BOARD OF SCHOOL DIRECTORS 275–76 (Aug. 28, 2025), <https://resources.finalsite.net/images/v1768946210/mpsmilwaukeeek12wius/adwktuqw2yig21usdmep/04AUG25.pdf> [hereinafter Milwaukee Board of School Directors Minutes].

²⁷ *About MPS*, MILWAUKEE PUB. SCHS., <https://www.milwaukeepublicschools.org/about> (last visited Sep. 1, 2026).

²⁸ Milwaukee Board of School Directors Minutes, *supra* note 26, at 276.

²⁹ DECATUR PUB. SCH. DIST. 61 BD. OF EDUC., REGULAR MEETING MINUTES 26 (Sep. 26, 2017), https://resources.finalsite.net/images/v1769618733/qncmqpqh51jvrtl57ve/sept_26_2017_open_session_packet.pdf.

³⁰ E-RATE CONSULTING AGREEMENT: FOR E-RATE FUNDING YEARS 2025, 2026, AND 2027 4 (rev. June 2023), [https://go.boarddocs.com/oh/wecs/Board.nsf/files/DBMKPM5185C6/\\$file/E-rate%20Consulting%20Agreement.pdf](https://go.boarddocs.com/oh/wecs/Board.nsf/files/DBMKPM5185C6/$file/E-rate%20Consulting%20Agreement.pdf).

³¹ *Regular Meeting of the Board of Education*, BALDWIN PARK UNIFIED SCH. DIST. (May 14, 2024), <https://go.boarddocs.com/ca/bpusd/Board.nsf/goto?open&id=CXJV5Z7F25B5>.

³² See, e.g., Paul Winfree, *Bidenomics Goes Online: Increasing the Costs of High-Speed Internet*, ECON. POL’Y INNOVATION CTR. (Jan. 8, 2024), <https://epicforamerica.org/the-economy/bidenomics-goes-online-increasing-the-costs-of-high-speed-internet/>; Liam Sigaud & Eric Sun, *The Hidden Cost of Medicaid Provider Taxes: Higher Prices in the Commercial Market*, PARAGON HEALTH INST. (June 24, 2026), <https://paragoninstitute.org/medicaid/the-hidden-cost-of-medicaid-provider-taxes-higher-prices-in-the-commercial-market/>.

³³ *Gift Rules*, UNIVERSAL SERV. ADMIN. CO., <https://www.usac.org/e-rate/applicant-process/competitive-bidding/gift-rules/> (last visited Aug. 31, 2026).

³⁴ See, e.g., Press Release, U.S. Dep’t of Just., Seven Defendants Sentenced for Defrauding Federal Program That Provided Technology Funding for Rockland County Schools (Feb. 28, 2023), <https://www.justice.gov/usao-sdny/pr/seven-defendants-sentenced-defrauding-federal-program-provided-technology-funding>.

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³⁶ Press Release, U.S. Dep’t of Just., U.S. Settles Lawsuits Against Hewlett-Packard and Intervenes Against Its Business Partners for Violating FCC Competitive Bidding Rules in Texas (Nov. 10, 2010), <https://www.justice.gov/archives/opa/pr/us-settles-lawsuits-against-hewlett-packard-and-intervenes-against-its-business-partners>.

³⁷ Press Release, U.S. Dep’t of Just., Seven Defendants Sentenced for Defrauding Federal Program That Provided Technology Funding for Rockland County Schools (Feb. 28, 2023), <https://www.justice.gov/usao-sdny/pr/seven-defendants-sentenced-defrauding-federal-program-provided-technology-funding>.

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⁴⁵ Maximizing Efficiencies in Universal Service Administration, 91 Fed. Reg. 55826 (proposed Aug. 31, 2026) (to be codified at 47 C.F.R. pt. 54); FED. COMMC’NS COMM’N, PUBLIC NOTICE, DA 26-367, WIRELINE COMPETITION BUREAU AND OFFICE OF THE MANAGING DIRECTOR SEEK COMMENT ON REFORMS OF USAC PROCESSES AND OVERSIGHT, CC DOCKET NOS. 96-45, 97-21, at 5–6 (Apr. 15, 2026), <https://docs.fcc.gov/public/attachments/DA-26-367A1.pdf>.

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⁴⁷ *Id.* at 8.

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