



HARRIS, WILTSHIRE
& GRANNIS LLP

October 18, 2019

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Modernizing the E-rate Program for Schools and Libraries (WC Docket No. 13-184)*

Dear Ms. Dortch:

On October 16, 2019, Bret Wincup of Hewlett Packard Enterprise (“HPE”), and Julie Veach and Landyn Rookard¹ of Harris, Wiltshire & Grannis LLP, counsel to Aruba (a Hewlett Packard Enterprise company), met with Bill Davenport, Chief of Staff to Commissioner Starks. Later in the day, Mr. Wincup, Ms. Veach, and Ansley Erdel of the Alpine Group met with Joel Miller, Chief of Staff to Commissioner O’Rielly. On October 17, 2019, Mr. Wincup and Ms. Veach met with Joseph Calascione, Legal Advisor to Commissioner Carr, and separately with Travis Litman, Chief of Staff to Commissioner Rosenworcel.

We discussed the urgent need for schools and libraries to be able to use E-rate funding for network security. According to the K-12 Cyber Incident Map, there have now been 712 reported cyber incidents involving public schools since January 2016: <https://k12cybersecure.com/map/>. The record in response to the Commission’s *Category Two NPRM* reflects broad support for making advanced network security eligible for E-rate funding. We urged the Commission to move quickly to ensure that network security appears on the Eligible Service List starting with Funding Year 2020.

Please be in touch if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Veach'.

Julie A. Veach
Counsel to Aruba, a Hewlett Packard
Enterprise Company

Attachment

¹ Mr. Rookard is admitted in Maryland only. He is practicing under the supervision of D.C. Bar members.

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cc: Joel Miller
Joseph Calascione
Travis Litman
Bill Davenport

E-rate Participants Need Access to Network Security Resources

October 2019

The Commission should act quickly to update network security as an eligible service in the pending *E-rate Category Two NPRM* and the pending *FY2020 Eligible Services List*.

E-rate is suffering from a plague of cyberattacks:

- E-rate beneficiaries are increasingly the victims of cyberattacks, including ransomware, theft of student and staff information, and attacks to disrupt network functionality. Schools have reported over 700 cyber incidents since January 2016.
 - These attacks have continued across the country into fall 2019, in some cases disrupting the beginning of the school year.
- The Governor of Louisiana declared a state of emergency after attacks in July 2019 on several school districts.
- Recovery from cyberattacks can cost millions of dollars and cause lengthy outages.
- E-rate currently does not provide funding for network security beyond basic firewalls.

Support is unanimous for including advanced network security:

- The record reflects broad and unanimous support to include modern network security among eligible services:
 - Support is overwhelming and unanimous from public education authorities across the country, including Florida, Illinois, Iowa, Kentucky, Nebraska, New Mexico, Oregon, South Carolina, Ohio, and Wisconsin.
 - National organizations representing leaders in education and library services, such as the Council of Chief State School Officers, which represents the heads of the education agencies of all fifty states, the State Educational Technology Directors Association, and the American Library Association, are among those urging the Commission to make advanced network security an eligible service.

Advanced network security eligibility should be addressed now:

- No additional funds are needed for the Commission to add advanced network security as an eligible service, and network security may lead to E-rate savings:
 - Network security will ensure that only authorized users and devices can use the school's or library's E-rate-supported broadband network, limiting the burden on the network, and allowing the beneficiary to purchase less capacity.
- The Commission should act as soon as possible so that schools and libraries can include advanced network security among their requests for FY2020 services in early 2020.