

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

Modernizing the E-Rate Program
For Schools and Libraries

WC Docket No. 13-184

Comments of Fortinet, Inc.

Fortinet, Inc. respectfully replies to Docket No. 13-184: Modernizing the E-Rate Program For Schools and Libraries before the Federal Communication Commission.

Fortinet develops and manufactures leading and top-rated network and content security, as well as secure access products that share intelligence and work together to form a cooperative fabric. Our unique [Security Fabric](#) combines Security Processors, an intuitive operating system, and applied threat intelligence to give you proven security, exceptional performance, and better visibility and control-- while providing easier administration.

The Fortinet Security Fabric architecture integrates Fortinet and Fabric-Ready Partner products to enable easier management, better protection, and automation of time-consuming tasks. As part of the Fabric ecosystem, Fabric-Ready Partner solutions in K-12 environments can be integrated with the Fortinet Security Fabric. School districts can leverage existing investments while still gaining the timesavings and stronger security of an integrated security architecture. Fortinet has proven security and networking solutions secure educational institutions of all sizes around the globe. Fortinet provides a wide array of e-rate eligible solutions for K-12 and Libraries.

Schools and libraries deal with an ever-increasing number of devices connecting to the network; they also must comply with regulations like FERPA and CIPA. Federal mandates such as CIPA are in essence; unfunded mandates that force the schools to comply without funding support. Schools and libraries must fend off alarmingly sophisticated threats like ransomware, malware, phishing, and scores of ever-increasing sophisticated attacks. They also must meet schools' exploding bandwidth demands with severely limited budgets and resources. Requiring schools to deploy CIPA compliant solutions without funding assistance is a burden that should be corrected with funding assistance from the FCC E-rate program.

The NPRM states that the FCC;

(1) propose amending our rules to make permanent the category two budget approach for all Applicants (Page 5 Paragraph 13);

Comment from Fortinet:

This amendment replaces the Two out of Five-Year Rule (which was in place prior to 2015), and gives more flexibility to Schools and Libraries. Fortinet supports this proposed change of the category 2 budgeting approach.

(2) Propose and seek comment on ways to improve the category two budget approach; and

The FCC also seeks comment on additional eligible services... Consistent with the Commission's determination in 2014 to make certain services eligible for category two support given the budgets' ability to prevent excessive spending, we propose extending the eligibility of managed internal broadband services, caching, and basic maintenance of internal connections under the permanent category two budget approach we propose today.. Further, are there additional services that we should make eligible for category two funding or any other issues regarding category two eligible services we should consider? (Page 6 and 7, Paragraph 18)

Comment from Fortinet:

Managed Internal Broadband Service, Basic Maintenance and Caching Servers, these services are of great importance to all Districts and should remain eligible. We support this proposed change and further ask that the filing of these services should be treated as the same general internal connections without having to be submitted in a separate Cat 2 category request. Many schools each year have had difficulty properly filing for Managed Internal Broadband Services as well as Basic Maintenance. The simplification of Category 2 filing of eligible services and products is long overdue.

The CIPA Act. The CIPA act is crucial to the safety of children/students. We believe the CIPA act should be enhanced to include a stronger stance for student safety. The addition of a comprehensive Cyber Hygiene and Cyber Security policy and process with the inclusion of: multi-factor authentication (at least two-factor authentication), Integrated security throughout the entire network from the Internet/Cloud through the internal network all the way to the edge of the LAN and finally to the end user device. We also believe that since the FCC demands compliance with the CIPA Act, all CIPA related services or hardware components should be deemed eligible under category 2, and/or as part of a Category 1 managed service Broadband. Requiring schools to provide security without providing funding is requiring the school to comply with an unfunded mandate. If we want to take student security seriously, the FCC must require comprehensive security and then assist with funding to implement a comprehensive security fabric.

Security--CIPA is just one crucial security issue that must be addressed by the FCC. It is long past time that the FCC address enhancing eligible security solutions to protect the students and staff in our schools as well as the patrons of our library systems. This would include "NextGen" Firewalls; application firewalls using in-line deep packet inspection, an intrusion prevention system along with other advanced security policies. Again, these security solutions are in addition to Web Filtering and basic port protection. The inclusion of a security fabric (security Fabric segments the entire network—from the Internet of Things (IoT) to the cloud to provide superior protection against ever increasing sophisticated threats.

VOIP Equipment—Applicants were severely impacted by the cancellation of voice services, which were phased out over the last 5 years. The FCC should return these funds to applicants or at least make VoIP equipment eligible so that Applicants can reduce their use of voice services.

In the *Category Two Budget Report*, the Bureau found that the category two budget approach appears to be sufficient for most schools and libraries with approximately half of schools and most libraries having used less than half of their allocated five-year budget and a supermajority of schools and libraries having used less than 90% of their budgets. Based on this finding, we propose maintaining the existing budget multipliers for the category two budget approach. Specifically, over a five-year funding cycle, schools would be eligible to receive up to \$150 (pre-discount) per student and libraries are eligible to

receive up to \$2.30 or \$5.00 (pre-discount) per square foot (depending on their Institute for Museum and Library Services (IMLS) locale codes). (Page 6 Section 15)

Comment from Fortinet:

We strongly take issue that not utilizing an Applicant's entire budget indicates that Applicants do not need more funding. On the contrary, it means that the applicants did not have the flexibility with the funds to address the needs of the district. The lack of flexibility is due in large part because the funding for the last 5 years was designated for each specific site. The Applicants were not able move funding to meet the true needs of their schools and stakeholders, such as older, needy schools therefore leaving surplus of unused funds. Many Districts in the 20% to 45% discount level and require a match larger than the discount. We believe the FCC should raise the floor for the Discount level to 50% for all entities. We also question why there is not more funding beyond \$150.00 per student given the demand for the previous 5 years. Another question along the same vein, why is the FCC funding at \$150.00 per student when the last COLA was at \$159.00+? We support increasing the funding to at least \$250.00 per student to meet the true cost of providing a comprehensive network infrastructure that will meet the need for performance and security as education continues its digital transformation (DX).

(3) Seek comment on how best to transition from the five-year test period to a permanent extension of this approach. (Page 3, Paragraph 13)

Comment from Fortinet:

Allow all applicants to rollover their unused funds as many could not utilize the funds due to the per site funding. Do this as a one-time rollover in addition to their new 2020 budget based on per student funding. This will enable applicants to maximize their funding for the next 5 years and provide their stakeholders with comprehensive and secure networks and learning environs.

We also seek comment on other potential ways to improve the budget approach, including moving to district-wide budgets and simplifying the budget calculations. (Page 6, Paragraph 17).

Comment from Fortinet:

District-wide budgets are necessary to allow Applicants flexibility and to optimize their funding. We support this proposal. Simplifying the budget calculations is essential as not all applicants utilize consultants and should at a minimum know their budget and to be able to plan their projects/services accordingly. We support any reduction in variables for budget calculations.