

September 3, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: WC Docket No. 13-184

Dear Secretary Dortch:

I am writing to provide reply comments of the Council of Chief State School Officers (CCSSO) on the Federal Communication Commission's (the Commission's) proposed rule on "Modernizing the E-Rate Program for Schools and Libraries." CCSSO is a nonpartisan, nonprofit membership organization representing public officials who head elementary and secondary education agencies in the states; the Bureau of Indian Education; the Department of Defense Education Activity; the District of Columbia; and five U.S. extra-state jurisdictions. CCSSO was pleased to join the Education and Library Networks Coalition (EdLiNC) in providing input on a number of issues addressed in the proposed rule. In addition, we submit these reply comments as a supplement to encourage the Commission to make cybersecurity costs eligible for E-Rate funding.

Broadband access is a necessary support for equitable educational opportunity in the 21st century, and state and school district broadband networks have become critical path elements for innovative classroom instruction. In order for E-rate to be fully effective, it should not only provide sufficient bandwidth and internal connectivity in schools and libraries, but also the necessary capacity to maintain online access that is safe, secure, and resilient. Currently, the only security measure eligible for E-rate support is basic firewall service. In addition to this service, we recommend allowing Category 2 funds to be used to protect broadband networks from increasingly prevalent cyberattacks, including but not limited to the costs for equipment or services which provide advanced firewall, intrusion detection, and DDoS attack mitigation. We believe these basic supports and services are necessary to the effective operation of a broadband network.

CCSSO also acknowledges the comments of the many stakeholders who have commented in support of making cybersecurity costs eligible for Category 2 support, including: the Nebraska Department of Education; the Kentucky Department of Education; the New Mexico Public School Facilities Authority; and the State E-Rate Coordinators Alliance and Schools, Health, and Libraries Broadband Coalition.

As chief state school officers across the country work to provide equitable educational opportunities for all students, they rely upon an effective E-Rate program to provide essential

supports. If I may be of any additional assistance to the Commission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Carissa Miller".

Carissa Moffat Miller
Executive Director
Council of Chief State School Officers

