

Sept 3, 2019

VIA ELECTRONIC FILING

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

Re: **Reply To Comments:**

***Modernizing the E-rate Program for Schools and Libraries -- WC Docket No. 13-184
Schools and Libraries Universal Service Support Mechanism -- CC Docket No. 02-6***

Dear Ms. Dortch:

Fortinet Supports the suggestions and thought sharing that have been shared by the vast majority of commenters in regards to:

1. Modernizing the E-rate Program for Schools and Libraries -- WC Docket No. 13-184
Schools and Libraries Universal Service Support Mechanism -- CC Docket No. 02-6

Specifically we are in full support of the ideas shared by Funds For Learning in their recent filings and ExParte notices. The accumulation of data clearly displays the need for change in the e-rate program. Specifically in regards to the E-rate Category Two (C2/Cat2) budget system. The 2015-20-19 "C2" budget changes were in large part, a rousing success and a huge improvement over the previous system. The "new C2" budget system is clearly a superior system over the previous. It is imperative that the FCC continue to asses, adapt and make permanent the "new C2 Budget" system.

Specifically we support the recommendation highlighted in the in the Funds For Learning ExParte notice that was submitted August 30, 2019. We supper the five changes recommended within the ExParte Notice be made to enhance the C2 budget system as well as the support of libraries mentioned:

1. The budget factors should be increased to better serve the needs of all sites, particularly small sites and older buildings. We recommend that the budget floor be set at \$30,000, the per student budget factor set at \$256, and that libraries have a unified per square foot budget factor of \$6.
2. District/system-level budgets should be applied to applicants who function with system-level budgets
3. The distinctions within the Category Two budgets (i.e. internal connections, basic maintenance of internal connections, and managed internal broadband services) were a relic of the priority system and are no longer necessary and should be unified under a single category listing: Internal Connections.
4. That all network related infrastructure be eligible for support and that the FCC eliminate the need to cost allocate network-related functions. Any security, network management or other network functionality that is not an end user device and is necessary for the proper functioning of a network should qualify for support and do so without a cost allocation.
5. We agree and recommended that the budget cycle be a fixed five-year period for all applicants.

It is imperative that comprehensive cyber-security solution be added to the Eligible Services List (ESL). We agree with the opinion voiced in Funds For Learning ExParte that all security and network infrastructure are crucial and should be added to the Eligible Service List (ESL) for 2020. The need for comprehensive Cyber-Security (Security Fabric) solution is glaringly apparent in the most recent COSN Leadership Survey:

- https://cosn.org/sites/default/files/CoSN_ITLdrship_Report_2019_Final.pdf
- #1 issue: **“Cybersecurity is the top priority for IT Leaders today”**
For the second straight year, cybersecurity has the top spot on IT Leaders’ technology priority list. At a time when school districts are collecting greater amounts of data, threats to the security of that data are also increasing. Since 2016, there have been over 621 reported K-12 cybersecurity incidents’.

The K-12 Cyber Attack Map details 621 incidents of cyber-incident (attack) since 2016. There has been a marked increase in attacks as the number of incidents have **increased by 88 incidents in the last 15 days**. The attack on schools and local government has increased to such a degree that on July 26, 2019 the Governor of Louisiana declared a “State of Cyber Emergency” when several local school districts and local government were attacked with ransomware. Also, on August 20, 2019 23 local Texas government agencies (also effected schools) were simultaneously attacked with Ransomware with a demanded ransom of \$2.8 million. These are just a few of hundreds of successful cyber-attacks on education and local government.

The top two industries targeted by viruses were Environmental and Education sectors. Education continues to be One of the most “fertile fields” for threat actors and cyber-criminals. The dominant threat families targeting Education were Riskware and Adware as well as DDoS and other threats. Education is one of the most targeted industries by cybercriminals, primarily due to the data that is stored in most school data centers & various “cloud” services. This information ranges from the PII of students, to stored payment information related to families/students fees and tuitions, to vendor banking information, etc.

To really protect our stakeholders And, especially the children, the FCC must really consider the review and revamping of what is required to comply with the Child Internet Protection Act and to aggressively keep students and stakeholders safety at the forefront as education continues its Digital Transformation (DX). Security Transformation (SX) should be a “funded mandate” and allow schools and libraries to invest In comprehensive cyber-security.

To not allow cyber-security and network management to be eligible for e-rate funding would display a blatant disregard of the safety of all K-12 stakeholders as well as the families of students. Fortinet appreciates the FCC actions in reviewing and calling for comments regarding: “Modernizing the E-rate Program for Schools and Libraries”.

Respectfully submitted

Jeff Jennings

National SLED Director, E-rate Program

Fortinet