

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Modernizing the E-rate Program for)	WC Docket No. 13-184
Schools and Libraries)	
)	

**REPLY COMMENTS OF FUNDS FOR LEARNING, LLC ON
PROPOSED ELIGIBLE SERVICES LIST FOR SCHOOLS AND LIBRARIES
UNIVERSAL SERVICE PROGRAM FOR FUNDING YEAR 2021**

Funds For Learning, LLC (“FFL”) submits these reply comments in response to the Wireline Competition Bureau’s public notice regarding the proposed Eligible Services List for E-rate funding year 2021.¹

**ADVANCED NETWORK SECURITY SERVICES AND ALL FIREWALL FEATURES
SHOULD BE ELIGIBLE FOR E-RATE FUNDING**

FFL concurs with Cisco Systems, Inc., (“Cisco”), Fortinet, and the State E-rate Coordinators’ Alliance (“SECA”) that network security services are of paramount importance to E-rate applicants. As stated in FFL’s initial comments² and by the parties above, funding network security and advanced firewall services via the E-rate program would:

- **Ensure that E-rate funds are not wasted on unreliable connectivity** – “A high-quality, high-speed internal network funded by E-rate is of no value to a school or library if it is taken offline by a cyberattack.”³
- **Align program rules with marketplace standards and terminology** – “The current standard of ‘basic port protection’ is horribly outdated and an inefficient means to secure

¹ Wireline Competition Bureau Seeks Comment on Proposed Eligible Services List for the E-rate Program, DA 20-767 (WCB rel. July 21, 2020).

² Comments of Funds For Learning on Proposed Eligible Services List for Schools and Libraries Universal Service Program for Funding Year 2021, WC Docket No. 13-184 (filed Aug. 14, 2020).

³ Petition for Waiver by Cisco Systems, Inc., Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184 at 3 (filed Aug. 20, 2020).

the learning networks. Today, broadband networks cannot function without advanced security, monitoring, and related services.”⁴

- **Reduce program complexity and promote fair and open competition** – “Network security and intrusion detection services are often bundled together with firewalls, but currently, these features of firewall appliances must be deducted from funding requests for firewall appliances . . . this restriction leads to more complex application preparation and processing in order to perform cost allocations to quantify associated costs . . .”⁵ “Allowing advanced network security features to be eligible as part of Category Two firewall service or equipment would also create a level playing field for applicants that select Category One Internet providers who have cleverly chosen to bundle these features with their standard service offerings.”⁶

The need for network security services is echoed by the applicant community as well. In Funds For Learning’s 2020 applicant survey, 98% of respondents indicated that cybersecurity should be eligible for E-rate support.⁷ In 2018 and 2019, 96% of respondents answered the same question affirmatively.

There is unanimous agreement that funding network security services via the E-rate program is good for applicants, good for service providers, and good for the efficiency and integrity of the program itself. We therefore join countless other stakeholders to request that the FCC include network security and advanced firewall features as eligible services in the funding year 2021 Eligible Services List.

⁴ Comments of Fortinet on Proposed Eligible Services List for Schools and Libraries Universal Service Program for Funding Year 2021, WC Docket No. 13-184 at 1 (filed Aug. 20, 2020).

⁵ Comments of the State E-rate Coordinators’ Alliance in Response to DA 20-767 Proposed Eligible Services List for FY 2021, WC Docket No. 13-184 at 10-11 (filed Aug. 21, 2020).

⁶ *Id.* at 11.

⁷ 2020 E-rate Trends Analysis, Funds For Learning Ex Parte Submission, WC Docket No. 13-184, CC Docket No. 02-6 (filed July 17, 2020) available at <https://ecfsapi.fcc.gov/file/1071774292501/2020-07-17%20Applicant%20Survey%20Results%20WCB%20Ex%20Parte.pdf>

Respectfully submitted,

John D. Harrington
Chief Executive Officer

Funds For Learning, LLC
2575 Kelley Pointe Parkway, Suite 200
Edmond, OK 73013
jharrington@fundsforlearning.com
(405) 341-4140

September 4, 2020