

**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
EDUCATION NETWORKS OF AMERICA, INC.**

Education Networks of America, Inc. (ENA) respectfully submits these reply comments in response to the Commission’s Notice of Proposed Rulemaking regarding the category two budget approach.¹ ENA writes in support of initial comments that support moving to a district-wide funding approach and ask the Commission to allow network security services that are added as category two services also be allowed to be provided by a service provider as part of a category one service.

ENA delivers high-capacity and future-ready connectivity, communication, cloud, security, and software services to K–12 schools, higher education institutions, and libraries across the nation. ENA would like to thank the Commission for seeking comment on these important issues. As a service provider that focuses on serving E-rate-eligible entities and, most importantly, their students and teachers, ENA respectfully offers its own perspective in support of some of the Commission’s proposals and in support of the recommendations made in the initial comments.

¹ *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket No. 13-184, Notice of Proposed Rulemaking, FCC 19-58 (rel. July 9, 2019) (*Notice*).

I. ENA SUPPORTS A DISTRICT-WIDE APPROACH TO CATEGORY TWO FUNDING

As an initial matter, ENA agrees with the Commission's proposal to extend the category two budget approach.² ENA commends the Commission for proposing to continue the approach that has provided predictable category two funding for more schools and libraries.

The *Notice* sought comment on whether to move from a per-school or per-library budget to a district-wide or system-wide budget for category two services.³ Many commenters, including EducationSuperHighway and the Western Governors' Association, responded in favor of moving to a district- or system-wide approach.⁴ ENA agrees with those commenters and recommends that the Commission adopt a district-wide approach to category two funding.

Based on its own experience as a service provider, ENA believes that a district-wide approach would be extremely beneficial to applicants. ENA routinely sees real-world cases of the example provided by SECA and SHLB in their joint comments, in which one school runs out of category two funding while another school in the same district uses only part of its funding.⁵ In some of the school districts that ENA serves, there are individual schools that still have internal connections needs, but have no category two budget left. A district-wide approach would give school districts much more flexibility to allocate category two funds to the schools with the greatest need and would prevent individual schools from being left out in the cold, as ENA is seeing now. As a provider of managed broadband services, ENA knows the number of students in a school is not the only determinative factor of cost to provide service. Factors such

² Notice ¶ 14.

³ *Id.* ¶¶ 22-27.

⁴ *See, e.g.*, EducationSuperHighway Comments at 3-4; SECA/SHLB Comments at 7-13; Western Governors' Association at 1.

⁵ *See* SECA/SHLB Comments at 8.

as age of the facility, construction materials and configuration of classrooms and common areas can dramatically impact the cost to deliver quality service. Allowing school districts the opportunity to manage budgets at the district level would help mitigate some of these challenges.

In addition, a district-wide approach would simplify the application process for school districts, and it would streamline record-keeping both for applicants and for service providers.⁶ In ENA's experience, having to track and invoice category two projects at the site level is complicated for ENA as well as for the school districts; moving to district-wide budgeting would make record-keeping easier for everyone involved.

II. IF THE COMMISSION ADDS NETWORK SECURITY SERVICES TO CATEGORY TWO OF THE ELIGIBLE SERVICES LIST, ENA URGES THE COMMISSION TO ALLOW APPLICANTS TO PURCHASE THOSE SERVICES AS CATEGORY ONE SERVICES AS WELL.

The *Notice* sought comment on additional services that it should make eligible for category two funding.⁷ In response, more than 20 commenters submitted comments in support of expanding the Eligible Services List to include cybersecurity and network security services. These commenters agree that network security services, such as advanced firewall features, DDoS prevention, intrusion protection devices, and other cybersecurity services are necessary for the operation of any network and should be eligible for funding support. No commenter argues against expanding the Eligible Services List to include cybersecurity and network security services.

ENA strongly supports the ability of schools and libraries to select the services they believe are the most needed. When a school district's network is compromised, it can undermine

⁶ Western Governors' Association at 1.

⁷ *Notice* ¶ 18.

all of the district's operations and activities: learning, testing, communications, human relations and operations systems, building surveillance, and much more. As Cox explained in its comments, DDoS and Ransomware attacks can compromise the E-rate program's investment in educational networks.⁸

Several commenters also argue that some network security services, such as security and firewall services also should be categorized as eligible category one services.⁹ ENA agrees with these commenters: ideally, these services would be eligible for category one funding, because typically they are a component of Internet access service, rather than a component of internal connections, and because bundling the services is the most effective and efficient way to deliver them. Currently, applicants have to cost-allocate network security services from their other E-rate eligible services and eliminating that requirement would significantly streamline the application process in that respect. In addition, if these services are also available as category one services, it would streamline the competitive bidding process.

ENA proposes that any cybersecurity services that are added as eligible under category two should be eligible as a service as category one or as a service in category two. That will allow schools and libraries to choose the most cost-effective option to meet their needs. That is, if cybersecurity services are allowed to be purchased as equipment, they should also be allowed to be purchased as a service adjacent to network services, to be purchased as a cloud-based service or as a managed service, just like MIBS.


⁸ Cox Comments at 4-5.

⁹ *See, e.g.*, AdvanEdge Solutions/Intelafunds Comments at 8; Alaska Department of Education and Early Development/Alaska State Library Comments at 4; South Butler County School District Comments at 1; West Virginia DOE Comments at 7.

III. CONCLUSION

ENA thanks the Commission for asking these important questions and appreciates the opportunity to respond. ENA believes that the record developed in response to the *Notice* will allow the Commission to ensure that individual schools are not left out of category two funding and that E-rate funds the security services schools and libraries need in the modern world.

Respectfully submitted,



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