

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Modernizing the E-rate Program for)	WC Docket No. 13-184
Schools and Libraries)	
)	
Wireline Competition Bureau Seeks)	
Comment on Proposed Eligible Services)	
List for the E-rate Program)	
)	

REPLY COMMENTS OF NCTA – THE INTERNET & TELEVISION ASSOCIATION

NCTA – The Internet & Television Association (NCTA) submits these reply comments in response to the Wireline Competition Bureau’s public notice seeking comment on the proposed eligible services list for the schools and libraries universal service support mechanism, known as the E-rate program, for funding year 2020.¹ We agree with Cox Communications, Inc. (Cox) that E-rate funding should support the provision of network security equipment and services to protect schools and libraries from cyberattacks.²

When the Commission in 2014 declined to provide E-rate support for additional network security services, such as those detecting network intrusions and guarding against Distributed Denial of Service (DDoS) attacks, it recognized the importance of reexamining this decision and left the record open to allow the program to evolve with changing technologies and circumstances.³ Cyberattacks against school networks have grown alarmingly over the past several years, perpetrated by individuals intending to create alarm and chaos, interrupt online

¹ *Wireline Competition Bureau Seeks Comment on Proposed Eligible Services List for the E-rate Program*, WC Docket No. 13-184, Public Notice, DA 19-738 (Wireline Comp. Bur., Aug. 2, 2019).

² Comments of Cox Communications, Inc., WC Docket No. 13-184 (Sept. 9, 2019) (Cox Comments).

³ *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Report and Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870, 8875, 8918, ¶¶ 9, 121 (2014).

testing, or extort money through a ransomware attack.⁴ These types of attacks can cripple school and library networks, making their internet services functionally or actually inaccessible. The cost of recovering from these types of attacks can be extremely expensive. It is no longer a luxury for these entities to invest in cyberattack prevention equipment and services and the Commission should ensure that E-rate support is available to enable them to do so.

As Cox notes, network equipment and services that protect against cyberattacks may be offered through hardware-based solutions or through virtual cloud-based solutions. E-rate support should be available for both. Because many types of services are transferring to software-based services, the Commission should make clear that, so long as the underlying function is eligible for E-rate support, virtualized services that perform the same function as a traditional hardware-based solution are eligible as well.

The Commission should help schools and libraries protect against the increasing threat of cyberattacks by adding network security solutions that prevent and mitigate ransomware and DDoS attacks to the E-rate eligible services list for funding year 2020.

Respectfully submitted,

Steven F. Morris

Steven F. Morris
Jennifer K. McKee
NCTA – The Internet & Television
Association
25 Massachusetts Avenue, NW – Suite 100
Washington, D.C. 20001-1431

September 18, 2019

⁴ See Cox Comments at 1 n.4 (listing examples of cybercrimes against schools in Louisiana, New York, Connecticut, Oklahoma, Rhode Island, and multistate services).