

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Proposed Eligible Services List for
the E-rate Program

WC Docket No. 13-184

COMMENTS OF THE CONSORTIUM FOR SCHOOL NETWORKING

The Consortium for School Networking (CoSN) respectfully submits these Comments urging the Federal Communications Commission (“Commission”) to define all current firewall and related features as “basic” beginning in funding year 2022 and allow for E-rate Category two to fully fund firewall devices and services without requiring any cost-allocation. This addition to the Eligible Services List (ESL) would not financially impact the E-rate program but will provide needed flexibility to the school district leaders tasked with filling their schools’ broadband and related cybersecurity needs. We also urge the Commission to permit the use of E-rate funds for connecting students to Wi-Fi on school buses when such connectivity is for educational purposes.

The Consortium for School Networking (“CoSN”) is a 501(c)(3) professional association for school system technology leaders. CoSN provides thought leadership resources, community, best practices, and advocacy tools to help leaders succeed in the digital transformation. CoSN represents over 13 million students in school districts nationwide. Our members are responsible for ensuring that students and school staff have broadband access and the other technology required for digital learning. This work includes assessing the district’s technology needs,

managing technology budgets, completing E-rate applications, and effectively administering E-rate funds to help meet their school districts' diverse and multifaceted technology needs.

The Commission Should add Advance Firewalls and Related Components to the Eligible Services List

Earlier this year, CoSN, the State Educational Technology Directors Association, the Council of the Great City Schools, the Schools, Health & Libraries Broadband Coalition, the State E-rate Coordinators Alliance, and the Alliance for Excellence in Education filed a Petition for Rulemaking urging the Commission to update the E-rate program to help school districts better address their growing cybersecurity security needs. The Petition described the urgent need to help school districts defend themselves from the rising tide of cyberattacks, including ransomware attacks, targeting school networks and sensitive student, teacher, and other school employee data. The Petition also showed that this requested update to the ESL is consistent with the Commission's authority and the program's allowable investments in components required to deliver high-speed broadband.¹

The E-rate covers basic firewall services and firewall components separate from basic firewall protection when provided as a standard component of a vendor's Internet access service, but due to an outdated conception of the technology, and as implemented by the Universal Service Administrative Company (USAC), this eligible use exists in name only. This programmatic shortcoming limits the cybersecurity tools available to E-rate recipients that lack the resources to acquire even basic cyber protections like firewalls while also forcing recipients to cost allocate cybersecurity protections that are bundled with their covered broadband services.

¹ Petition for Rulemaking filed by the Consortium for School Networking, Council of the Great City Schools, State Educational Technology Directors Association, State E-rate Coordinators' Alliance, Alliance for Excellent Education, Schools, Health & Libraries Broadband Coalition, WC 13-184, February 8, 2021.

The Commission has statutory authority to address this problem and help school districts that need cybersecurity assistance. In the Petition cited above, CoSN and our national partners highlighted the Commission’s statement in the July 2014 E-rate Modernization Report and Order and Further Notice of Proposed Rulemaking that firewall services are “necessary to ensure delivery of high-speed broadband services.” The Commission also said in the *July 2014 Modernization Order*, consistent with the authority provided by the Act, that it “...reasoned that such services enhance access to advanced telecommunications and information services for public and non- profit elementary and secondary school classrooms and libraries.” The Commission noted in the *July 2014 Modernization Order* that it adopted a narrow vision of covered services to maximize support for connectivity investment, but the rising tide of cyberattacks make cybersecurity among the components the Commission must now consider “needed to deliver broadband to students” and that “are essential to education, public health, or public safety.”²

With cyberattacks threatening the broadband networks and data of schools, including very low-income school systems, the Commission must update the E-rate program to cover firewalls and related features. This change is necessary to ensure continued consistent delivery of high-speed broadband service to schools. Over the longer term, the Commission should also expand E-rate Category Two’s coverage to include more sophisticated cybersecurity protections, such as endpoint security features and systems for authenticating user identities and segmenting online access. These additional changes should be accompanied by a commensurate increase in the Category Two budget.

² July 2014 Modernization Order, 29 FCC Rcd 8870, 8917 para. 119; 47 U.S.C. § 254(c)(1)(A).

The Commission should add Wi-Fi on School Buses to the Eligible Services List

For many years, CoSN has urged the Commission to permit E-rate applicants to use the program's funding to provide Wi-Fi on school buses. We reiterate that concern in this proceeding. Like mobile libraries, school buses can serve as mobile educational facilities, and many students are routinely subject to long bus rides where they would benefit from broadband access to complete their homework and access learning resources while they are in transit. This addition to the ESL would help interested school districts turn buses into learning spaces on wheels, recapturing learning time beyond school campuses. CoSN members have seen this strategy at work effectively for students in communities from California to Alabama. Furthermore, school districts that put Wi-Fi on buses have found reduced behavioral problems when students can do their work productively.

Thank you for carefully considering CoSN's Comments about the ESL. Making these changes to the list will strengthen the E-rate program for the next application year and beyond. The E-rate has been an invaluable tool for school districts and expanding the program to better include cybersecurity and buses will continue the program's positive legacy for learners across the country.

Respectfully submitted,

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