In the midst of the COVID-19 Pandemic. Education has been forced to pivot in literally three months to embrace a whole new paradigm as well as a new pedagogy that will carry forward, forever impacting education. This has caused schools and libraries to perform a complete digital transformation (DX) and enable the entire business of education to be performed remotely. However, schools and libraries must perform a complete security transformation (SX) as well. The process of education is now completely dependent upon remote learning and hybrid networks and as such prime targets for cyber-attacks. The broadened attack surface has left education agencies and libraries vulnerable to those that would take advantage of this hyper speed digital transformation. It is imperative that the FCC e-rate program take steps to not only continue the enabling of the digital transformation but support the security transformation as well.

Fortinet is enabling schools and libraries to successfully navigate this transformation. We appreciate the opportunity to provide input on the funding year 2021 Eligible Services List ("ESL"). We believe the following suggested changes and additions are crucial to schools and libraries successfully enabling and sustaining this new reality for education.

First, FORTINET agrees and echoes Funds For Learning (FFL) call for the Wireline Competition Bureau ("WCB") to clarify that network security and monitoring services qualify for E-rate support. The current standard of "basic port protection" is horribly outdated and an inefficient means to secure the learning networks. Today, broadband networks cannot function without advanced security, monitoring, and related services. "We are not asking the WCB create a new class of eligible services to include network security and monitoring services and equipment. Instead, we suggest that it fits into the existing eligible services framework because it is necessary to provide broadband access to students, patrons, and their communities. The Commission has acknowledged the importance of permitting applicants to allocate their Category Two budgets how they see fit. For the same reasons, we support giving schools and libraries the option and flexibility to spend their Category Two budgets on what network infrastructure they believe to be most essential to building and maintaining their networks, including security and network monitoring services".

Second, we concur with FFL that we call on the WCB to: "Clarify that all on-premise devices may connected to structured cabling and data distribution equipment, thereby eliminating the associated cost allocation requirement. USAC's enforcement of the rules concerning what equipment can and cannot be connected to Category Two infrastructure is inconsistent and arbitrary. Determinations are not made using any clear criteria. Instead, USAC appears to make determinations on a case-by-case basis, depending on the type of network device at issue, and whether it serves an "educational purpose." This requires applicants to perform complex cost allocations to remove the associated costs for any ineligible equipment. We believe important practical considerations require eliminating these unnecessary restrictions. At a minimum, the WCB should clarify existing rules concerning network-connected devices and establish clear eligibility criteria".

Third, we agree with FFL to: "firmly support eliminating the distinctions between different Category Two services and, instead, treating the services as a single category comprising all eligible Category Two functionality. Because the sub-categories of service are confusing and routinely lead to unnecessary procedural funding denials, this has created systemic hurdles in the funding and payment process. Moreover, under existing E-rate rules, the Category Two service distinctions serve no practical purpose. Eliminating the Category Two sub-categories will also lead to greater program efficiency and reduce

delay caused by unnecessary funding denials. With these improvements and clarifications, the WCB's eligible service rules will better serve all E-rate stakeholders by offering clarity and removing unnecessary restrictions on the use of necessary services and equipment".