

**Before the
Federal Communications Commission
Washington DC 20554**

In the Matter of)	
)	
Wireline Competition Bureau Seeks)	WC Docket No. 13-184
Comment on Proposed Eligible Services)	WC Docket No. 02-06
List For The E-Rate Program)	

**COMMENTS OF INFINITY COMMUNICATIONS AND CONSULTING
ON THE PROPOSED ELIGIBLE SERVICES LIST FOR THE E-RATE PROGRAM**

Infinity Communications & Consulting, Inc. (Infinity) is an Technology consultant representing more than 450 E-Rate applicants across the United States. We also design technology systems, including all current E-Rate Category One and Category Two eligible services. In the 18 years Infinity has been in business, we have supported public agencies with thousands of filings in support of communities. In addition to supporting those public agencies, Infinity has a vested interest in the modernization of the E-Rate program. With this background in mind, Infinity submits the following comments on the Commission’s Request for Comments regarding the emergency funding made available for the effort to close the known homework gap.^[1]

^[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*).

Current Eligible Services List

Infinity feels strongly that the current version of the Eligible Services List (ESL) is sufficient to provide anchor institutions with necessary network infrastructure to provide access to the internet. We do recognize that firewalls are covered by the ESL, but only in part and submittals require cost allocation for services necessary for operation. Infinity believes that all aspects of the firewall, including software associated with the firewall, should be allowed as an E-Rate expense.

Additions to the Eligible Services List

Infinity believes that anchor institutions have a legal, moral and ethical obligation to protect the information that is required to be collected on its students, staff members, and patrons. It is not enough to simply provide technology rich resources to our student-stakeholders. We must protect our students and patrons, their information, and the resources we provide them to learn. The current trend of anchor institutions having sensitive information seized by nefarious acts brings to light the need for increased network security. We feel that the following should be added to the Eligible Services List in an effort to assist anchor institutions in their effort to secure confidential information. Cybersecurity solutions that are included but are not limited to are Endpoint Protection, Advanced Threat Detection, Cybersecurity Assessment and Threat Intelligence.

Respectfully submitted by:

A handwritten signature in cursive script that reads "Fred Brakeman".

Fred Brakeman RCDD, CSI, CEMP
Chief Executive Officer
Infinity Communications & Consulting Inc.