

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Establishing Emergency Connectivity Fund ) WC Docket No. 13-184  
To Close The Homework Gap )  
 )

**REPLY COMMENTS OF THE COUNCIL OF THE GREAT CITY SCHOOLS**

The Council of the Great City Schools is pleased to submit reply comments in response to the Public Notice on the Proposed Eligible Services List for the FY 2022 E-Rate Program (WC Docket No. 13-184; DA 21-1062) and urges the Commission to make all firewall components and services eligible for E-Rate support under Category Two budgets for the upcoming program year.

The Council of the Great City Schools includes 75 school districts, or less than one-half of one percent of the approximately 14,000 school districts in the U.S., but as the nation’s largest urban school systems, our members enroll over 8 million students, including approximately 28 percent of the nation’s Hispanic students, 29 percent of the nation’s African American students, and 25 percent of the nation’s children living in poverty. The value of the E-Rate is apparent every day to the districts in the Council, as we serve the highest numbers and concentrations of disadvantaged children, employ the largest number of teachers, and operate in the greatest number of outdated and deteriorating buildings.

**E-Rate Support Needed to Prevent Cyberattacks**

The Council requests that the Commission include advanced firewall components and services as part of the FY 2022 Eligible Services List. Cyberattacks on urban school districts are on the rise, with ransomware demands threatening the exposure of records containing student, staff and financial data, as well as the loss of vital instructional and operational time. Allowing E-Rate to support valuable protective measures within applicants’ existing Category Two budgets is a necessary, cost-effective, and logical decision that will safeguard the network investments that school districts and the Commission have made.

In the 2019 Category Two Report and Order, the Commission declined to make any additional services eligible, noting that applicants should prioritize their Category Two funding requests on deploying high-speed broadband. Since that time, however, the COVID-19 pandemic increased 1:1 instruction, moved a large portion of teaching and learning online, and expanded educator reliance on content-rich media sources. Even with most students and staff returning to physical classrooms this year, school districts are working diligently to ensure the benefits of digital learning continue to be a part of their educational offerings. With an increase in malicious threats and online services, a robust and safe network is needed to maintain the volume of learning platforms and blended instructional approaches that are in place. School districts cannot sacrifice one for the other and must prioritize both broadband access and security.

A recent [Council report on Best Practices in Procurement](#) included a chapter on cybersecurity, highlighting the importance of educating staff about phishing and emphasizing password and authentication security, but most importantly, investing in proper cybersecurity. Districts are doing what they can to train and inform the school community about online behavior, but the importance of having the right cybersecurity software, encryption devices, and firewalls cannot be overstated. Having a strong first line of defense in place is costly but can help prevent these types of attacks. The Commission's inclusion of effective firewall protection as eligible services will allow applicants to choose cybersecurity costs as part of their existing Category Two budgets.

Urban school districts have taken a proactive role in preventing attacks, and Council members have shared [best practices in cybersecurity](#) among themselves, alerted each other of breaches in their systems, and facilitated discussion about plans and tools to prevent further security incidents. IT professionals know it is incumbent upon them to develop a formalized strategy for maintaining a secure network, identify and close gaps in network vulnerabilities, educate all individuals within their school community about their role in cyber security, and find recurring funding sources to invest in needed network security tools.

### **Petitioners for Rulemaking on Cybersecurity Agree on E-Rate Support**

Earlier this year, the Council joined the Consortium for School Networking (CoSN), the State Educational Technology Directors Association, the Schools, Health & Libraries Broadband (SHLB) Coalition, the State E-rate Coordinators Alliance, and the Alliance for Excellence in Education in filing a Petition for Rulemaking. That submission described the importance of helping school districts prepare for the increase in cyberattacks and advocated for updating the E-Rate to help school districts tackle their increasing security needs. In their own comments on the FY 2022 Eligible Services List, CoSN explained that the E-Rate's inadequate support for cybersecurity should be strengthened, as the program currently provides protection "in name only." Urban school districts must bear the cost of these services almost entirely on their own, and as CoSN went on to explain, "This programmatic shortcoming limits the cybersecurity tools available to E-rate recipients that lack the resources to acquire even basic cyber protections like firewalls."

The SHLB Coalition also highlighted the financial implications for school districts in their comments, sharing that, "The FBI issued a joint advisory last December 2020 based on an increase in ransomware attacks against K-12 educational institutions. Many cyber-attacks try to obtain confidential student data and threaten to leak it unless organizations pay a ransom." Indeed, many of the Council's own members have been targeted in ransomware attacks, as recently as last month. SHLB's comments also noted a CISCO report which cited an increase in the percentage of reported ransomware incidents involving K-12 schools from 28% in the first half of 2020 to 57% in the fall. Both CoSN and SHLB urged the Commission to include cybersecurity expenses as eligible for Category Two support. We repeat and support their request in these comments.

### **E-Rate Support Can Protect Networks and Control Rising Costs**

In response to the rising attacks in recent years, many districts have been forced to purchase Cyber Liability Insurance. E-Rate firewall support will not only directly increase the security for schools nationwide, but the availability of more widespread protection may also help stabilize the cost of cybersecurity insurance premiums, which have increased by as much as 100-150% for some urban districts in the past year.

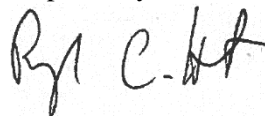
Coverage for the financial consequences of electronic security incidents and data breaches is costly, but E-Rate support for firewall services can help lower the risk that insurance companies cite for rising premiums, as well as the number of targets nationwide.

The technology needs that existed in school districts nationwide became plainly apparent when the COVID-19 pandemic resulted in school closures, hybrid learning, and synchronous/asynchronous instruction. The increased digital access that has followed provides clear academic advantages, but the growing number of online users, devices connected to our networks, and demand for technical support has only added to the security-related costs that school districts have been bearing almost entirely on their own.

## **Conclusion**

Urban schools are grateful for the recent efforts by the Commission to connect students and families off-campus through the Emergency Connectivity Fund and Emergency Broadband Benefit program, as well as the historic and ongoing support that E-Rate provides to connect our classrooms. Recent changes to the E-Rate program provide applicants with the flexibility to administer a single Category Two budget districtwide and allocate funding among schools where needed. We urge the Commission to extend similar flexibility and support to applicants by adding advanced firewall services as an eligible Category Two expense without requiring cost-allocation, beginning in FY 2022.

Respectfully Submitted,



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**Member districts:** Albuquerque, Anchorage, Arlington (Texas), Atlanta, Aurora, Austin, Baltimore, Birmingham, Boston, Bridgeport, Broward County (Ft. Lauderdale), Buffalo, Charleston County, Charlotte-Mecklenburg, Chicago, Cincinnati, Clark County (Las Vegas), Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, Duval County (Jacksonville), East Baton Rouge, El Paso, Fort Worth, Fresno, Guilford County (Greensboro, N.C.), Hawaii, Hillsborough County (Tampa), Houston, Indianapolis, Jackson, Jefferson County (Louisville), Kansas City, Long Beach, Los Angeles, Manchester, Miami-Dade County, Milwaukee, Minneapolis, Nashville, New Orleans, New York City, Newark, Norfolk, Oakland, Oklahoma City, Omaha, Orange County (Orlando), Palm Beach County, Philadelphia, Pinellas County, Pittsburgh, Portland, Providence, Puerto Rico, Richmond, Rochester, Sacramento, San Antonio, San Diego, San Francisco, Santa Ana, Seattle, Shelby County (Memphis), St. Louis, St. Paul, Stockton, Toledo, Toronto, Tulsa, Washoe County (Reno), Washington, D.C., and Wichita.