

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

In the Matter of)
) CC Docket No. 13-184
The Proposed Eligible Services)
List for the E-rate Program)

**Reply Comments Of Funds For Learning, LLC
On The Draft Eligible Services List For FY2022**

Funds For Learning (FFL) submits these reply comments in response to the Wireline Competition Bureau’s (WCB) public notice seeking comment on the proposed eligible services list for the E-rate program for Funding Year 2022.¹ We agree with Consortium for School Networking (CoSN) that E-rate funding should define all current firewall and related features as “basic” and fully fund firewall devices without requiring any cost-allocations.²

Today, broadband networks cannot function without security, monitoring, and related services. FFL agrees with CoSN that expanding the definition of a “basic” firewall 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 firewalls and related firewall features.

K-12 schools increasingly find themselves under sophisticated cyberattacks that cause significant damage and disruption, and risk our commitment to protecting student data, as well as ensuring equitable and safe Internet access for learning. The FBI has recently issued warnings that K-12 is

¹ *Wireline Competition Bureau Seeks Comment on Proposed Eligible Services List for the E-rate Program*, WC Docket No. 13-184, Public Notice, DA 21-1062 (Wireline Comp. Bur., Aug. 27, 2021).

² Comments of the Consortium for School Networking (CoSN), WC Docket No. 13-184 (September 27, 2021).

the most targeted public sector due to ransomware attacks. In the 2020 nationwide survey of E-rate applicants, 98% of respondents expressed support for security in the Eligible Services List³.

As schools scramble to train users, shore up their networks and deploy electronic countermeasures, there is a growing awareness by educators, policymakers, and the public that existing school technology budgets are inadequate for the increased security challenge. More support is needed; and expanding the federal E-rate program's existing basic firewall definition could bring timely financial aid to help defend school networks.

Respectfully submitted,

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³ See <https://ecfsapi.fcc.gov/file/1071774292501/2020-07-17%20Applicant%20Survey%20Results%20WCB%20Ex%20Parte.pdf>
The 2021 survey results are being released on October 27, 2021, and a similar level of support is expected.