

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

**In The Matter of** )  
 )  
**Modernizing the E-rate Program for** ) **WC Docket No.13-184**  
**Schools and Libraries** )

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**Reply Comments on the  
Proposed Eligible Services List (ESL) for funding year 2022  
from the  
Wisconsin Department of Public Instruction (WIDPI)  
(Filed October 12, 2021)**

The Wisconsin Department of Public Instruction (WIDPI) is the state’s education and library agency. The department has statutory oversight for our state’s 423 public school districts that serve a population of 855,000 PK-12 students, and our 384 public libraries that serve all 5.5 million residents of Wisconsin.

We are writing in strong support of the comments of the Schools, Health, and Library Broadband Coalition (SHLB)<sup>1</sup> and the Consortium for School Networking (CoSN)<sup>2</sup> advocating for modernizing the E-rate program by adding Wi-Fi on school buses and cybersecurity to the list of services eligible for E-rate funding. (We note that the WIDPI has previously filed in support of the eligibility of both Wi-Fi on school buses and cybersecurity.<sup>3</sup>)

**WiFi on school buses**

The purpose of the E-rate program is to provide substantial assistance to schools so that their students can access the internet to support their education. As was clear to many before the pandemic, and became clear to all during the pandemic, students need internet access at home to participate in school. However, many students do not have Wi-Fi access at home.

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<sup>1</sup> Comments of SHLB, WC Docket No. 13-184. In The Matter of Modernizing the E-Rate Program for Schools and Libraries. Filed September 27, 2021.

<sup>2</sup> Comments of CoSN, WC Docket No. 13-184. In The Matter of Modernizing the E-Rate Program for Schools and Libraries. Filed September 27, 2021.

<sup>3</sup> WIDPI filed comments [supporting the use of E-rate funds for Wi-Fi on school buses](#) in July 2016. Our comments [supporting the use of E-rate for cybersecurity](#) were filed in September 2020.

We strongly agree with SHLB and CoSN that this is a serious inequity that can be at least partially addressed, and in a cost-effective manner, by providing Wi-Fi to students on school buses: “Roughly thirty percent of households do not have broadband access at home today, and this percentage can be much higher in lower-income neighborhoods. School bus Wi-Fi can provide an important and cost-effective way to provide internet access to those who need it.”<sup>4</sup>

### **Cybersecurity**

When the FCC modernized the E-rate program in 2014 to include funding for internal connections, it recognized that it is not possible to connect students to the internet at school without a computer network that delivers the internet to students within their school. Since 2014, cyberattacks have emerged as a threat to those networks. If a network is shut down by ransomware, for example, students cannot connect to the internet.

The frequency of cyberattacks against schools is mushrooming. A joint advisory issued by the FBI, CISA, and MS-ISAC reported that there were twice as many ransomware incidents in the second half of 2020 as there were in the first half.<sup>5</sup>

SHLB rightly points out that adding cybersecurity to the list of eligible services in Category 2 would not increase demand on the fund: “Allowing cybersecurity expenses to be eligible for Category 2 E-rate support does not require the Commission to alter its budget approach for Category 2 expenses, as schools and libraries would have the flexibility to choose whether to use their Category 2 support for cybersecurity or other expenses without changing the size of the budget.”<sup>6</sup>

### **Conclusion**

In light of these considerations, and to ensure its goal of bringing internet access to students to support their participation in school, the Wisconsin Department of Public Instruction joins SHLB and CoSN in urging the FCC to add Wi-Fi on school buses and cybersecurity to the list of services eligible for E-rate funding.

Respectfully submitted,

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<sup>4</sup> SHLB comments, page 2.

<sup>5</sup> CISA Reports: [Increased Ransomware Attacks Targeting K-12 School Districts](#). March 2, 2021.

<sup>6</sup> SHLB comments, page 3.