

# ALA American Library Association

## Before the Federal Communications Commission Washington, DC 20054

### In the Matter of:

**Modernizing the E-Rate Program for Schools and Libraries** )  
 ) **WC Docket No. 13-184**

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## Comments of the American Library Association In Response to the Proposed E-rate Eligible Services List for FY 2023

The American Library Association (ALA) is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. For more than 140 years, ALA has been the trusted voice for academic, public, school, government and special libraries, advocating for the profession and the library's role in enhancing learning and ensuring access to information for all. ALA represents the nation's 120,000 libraries, which includes 16,557 public libraries. We appreciate the opportunity to comment on the Proposed E-rate Eligible Services List for FY 2023.

The American Library Association has no substantive changes to the proposed 2023 Eligible Services List (ESL). Rather, the association is once more asking the Commission to consider making comprehensive security tools eligible for E-rate support. We have made this request in past filings<sup>1</sup>

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<sup>1</sup> For example, see ALA Reply Comments for the Proposed E-rate Eligible Services List for FY 2020, filed September 3, 2019; and ALA Reply Comments for the Proposed E-rate Eligible Services List for FY 2021, filed September 4, 2020.

and think that the need for comprehensive network security in both our libraries and schools has never been more evident. In addition to our requests on this issue, numerous other organizations have made similar requests. Most notably, we call the Commission’s attention to a comprehensive filing on this issue submitted on February 8, 2021, by a consortium of six parties.<sup>2</sup>

As the federal Cybersecurity and Infrastructure Security Agency states: “K-12 school communities face an evolving and unique set of threats, hazards, and security challenges ranging from targeted violence to bombing threats to cyberattacks.”<sup>3</sup> We think nothing has more graphically shown this threat than the recent ransomware attack suffered by the Los Angeles Unified School District, the second largest district in the country. In a September 14, 2022, filing with the Commission the district urged it to “Immediately authorize the ongoing, permanent use of existing E-Rate Program funds to bolster and maintain IT security infrastructure.”<sup>4</sup> While highlighting K-12 schools, our public libraries are equally vulnerable to online attacks. An article published in May 2021 by the Public Library Association highlights the many online threats faced by our libraries.<sup>5</sup> Further, a 2020 national technology survey found that more than 90% of all public libraries report internal data and network is a high or medium priority for them.<sup>6</sup>

In conclusion, the American Library Association strongly encourages the Commission to add security tools to the 2023 Eligible Services List. If the Commission believes that this is not the correct venue to request adding services to the list, then we respectfully request the Commission to follow-up on the commitment it made in the July 2014 Modernization Order and open a separate proceeding as soon as possible seeking comments on adding security tools to the E-rate’s Eligible Services List.<sup>7</sup>

Respectfully submitted,

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<sup>2</sup> The parties include the following organizations: The Consortium for School Networking, the State Educational Technology Directors Association, the Alliance for Excellent Education, the State E-rate Coordinators’ Alliance, the Council of The Great City School, and the Schools, Health, & Libraries Broadband Coalition.

<sup>3</sup> See: <https://www.cisa.gov/school-safety-and-security>.

<sup>4</sup> “Addressing the Urgent Need to Combat Cyber Security Threats at Schools by Leveraging E-Rate and Other Federal Funds.” Filing submitted by the Los Angeles Unified School District, September 14, 2022.

<sup>5</sup> See: "Ransomware Attacks at Libraries: How They Happen, What to Do" May 10, 2021. (

<https://publiclibrariesonline.org/2021/05/ransomware-attacks-at-libraries-how-they-happen-what-to-do/>).

<sup>6</sup> See: <https://www.ala.org/pla/sites/ala.org/pla/files/content/data/PLA-2020-Technology-Survey-Summary-Report.pdf> (p.21)

<sup>7</sup> We note in the July 2014 Order that the Commission declined to "designate further network security services" as being E-rate eligible. However, the Commission also stated that, "We leave the record open on these services to allow for further comment...." Paragraph 121, *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184. Released July 23, 2014.

/s/ Alan Inouye  
Senior Director of Public Policy & Government Relations  
ALA Public Policy & Advocacy

/s/ Robert Bocher  
Senior Fellow  
ALA Public Policy & Advocacy

/s/ Megan Janicki  
Deputy Director, Strategic Initiatives  
ALA Public Policy & Advocacy