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

In the Matter of	:
Schools and Libraries Universal Service	: WC Docket No. 13-184
Support Mechanism	: CC Docket No. 02-6

REPLY COMMENTS OF ARUBA, A HEWLETT PACKARD ENTERPRISE COMPANY, ON THE DRAFT ELIGIBLE SERVICES LIST FOR SCHOOLS AND LIBRARIES UNIVERSAL SERVICE PROGRAM FOR FUNDING YEAR 2023

For many years, Aruba, a Hewlett Packard Enterprise company and a leading Wi-Fi and networking equipment manufacturer, has advocated for E-Rate funding for advanced network security services, demonstrating that those services are essential to ensure safe and secure high-speed broadband connectivity in schools and libraries.[1]

The recent ransomware attack on the Los Angeles Unified School District (LAUSD), one of the nation's largest school districts, illustrates how critical this issue is and how urgently cybersecurity funding is needed. We strongly support the position set forth by stakeholders including LAUSD, the Consortium for School Networking (CoSN), State E-rate Coordinators Alliance (SECA), State Educational Technology Directors Association (SETDA), and Schools, Health & Libraries Broadband (SHLB) Coalition, urging the Commission to allow use of E-Rate funds to bolster and maintain IT security infrastructure. As stated by CoSN et al.:

> The recent cyber-attack on the LA Unified School District, along with hundreds of similar attacks on schools, libraries, and other educational institutions over the past few years, highlights the urgent need for federal officials to take immediate action to protect our nation's educational entities from cyber-attacks. The FBI, the Cybersecurity and Infrastructure Security Agency (CISA), and the Multi-State Information Sharing and Analysis Center (MS-ISAC) have previously warned that educational networks are soft targets and vulnerable to cyber-criminal behavior, but the US government has not done enough to protect these networks from harm. [We] jointly call upon the Federal Communications Commission (FCC) to immediately modernize its definition of "firewalls" to allow E-rate funding to be used to safeguard school and library networks. We also urge the FCC to open a rule-making proceeding and take comment on the

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[1] Among other submissions, Aruba has provided specific data on what network security includes. *Ex parte notice* (Sept. 24, 2019), https://www.fcc.gov/ecfs/search/search-filings/filing/10924260020672.

Petition filed by our organizations in February 2021 to adopt long-term solutions to this growing cybersecurity crisis.[2]

Aruba welcomed the Commission's recent confirmation that the "important concept[]" of cybersecurity is "already captured by our existing availability goals."[3] We join the broader E-Rate community in urging the Commission to effectuate those goals by specifying that advanced network security features necessary to provide broadband access to students, library patrons, and their communities are eligible for E-Rate funding.

Respectfully submitted by:
Aruba, a Hewlett Packard Enterprise company

/S/ Dan Rivera

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[2] *LAUSD comment* (Sept. 14, 2022), https://www.fcc.gov/ecfs/search/search-filings/filing/10914445618120; *Statement of CoSN et al.*, https://www.cosn.org/cosn-news/statement-from-the-consortium-for-school-networking-cosn-state-e-rate-coordinators-alliance-seca-state-educational-technology-directors-association-setda-and-schools-health-libraries-broad/.

[3] *Report on the Future of the Universal Service Fund*, Par. 14 (Sept. 15, 2022), https://www.fcc.gov/document/fcc-reports-congress-future-universal-service-fund.