

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Modernizing the E-rate Program for
Schools and Libraries

WC Docket No. 13-184

REPLY COMMENTS OF THE CONSORTIUM FOR SCHOOL NETWORKING

The Consortium for School Networking (CoSN) submits these Reply Comments in support of the Comments filed by the American Library Association, the Council of the Great City Schools, and other respondents urging the Federal Communications Commission (“Commission”) to update the 2023 E-rate Eligible Services List to better address schools’ and libraries’ cybersecurity needs. Specifically, CoSN respectfully encourages the Commission to expand E-rate eligibility for basic firewalls to include all current firewall and related features without requiring cost-allocations.

CoSN’s members are the school district professionals responsible for equipping millions of students and staff in 30 states with the technology and broadband connectivity required for digital teaching and learning. As a result, they are deeply versed in the E-rate program’s connectivity benefits and important requirements. Our members also work on the front lines protecting school district networks and schools’ confidential student and employee data from a rising tide of ransomware and other cyber-attacks. Thus, they understand better than anyone that the E-rate program plays a narrow but still powerful role in strengthening the nation’s still evolving K-12 cybersecurity response.

Unfortunately, many school districts are underequipped to protect themselves from the increasingly sophisticated tools and strategies that bad actors use to disrupt learning and steal sensitive information about kids and the adults who work with them. CoSN’s 2022 *State of Ed Tech Leadership Survey* found that only 15% of school districts felt “very” or “extremely” prepared to address their cybersecurity needs. School districts also said they are typically not properly staffed with dedicated cybersecurity experts. Only 21% of school districts responding to the CoSN 2022 *State of Ed Tech Leadership Survey* reported having a full-time equivalent employee dedicated to network security.¹ Most (62%) districts purchase cybersecurity insurance to help them mitigate the burdensome financial challenges that can follow major cyberattacks and data breaches, but insurance costs have increased substantially, and fewer policies are available. For example, Gallagher Risk Management Services’ latest 2022 *Cyber Market Conditions Report* estimates that policies will be 100% to 300% more expensive for organizations, including school districts, that do not have “best-in-class” security controls.²

Given school district’s cyber-readiness needs, rising insurance costs, and the persistent and rising cybersecurity threat schools face, CoSN strongly encourages the Commission to ensure that the E-rate program defines all firewall and related features as “basic”. Updating the program’s out of date firewall definition to reflect recent technological and service improvements is essential. The requested program improvement is consistent with the Commission’s criteria for determining the non-telecommunications services to be covered by the E-rate; the change is necessary to ensure continued consistent delivery of high-speed broadband service to schools and students. Lastly, we urge the Commission to respond affirmatively to the

¹ CoSN *State of Ed Tech Leadership Survey* (2022) available online at <https://www.cosn.org/edtech-topics/state-of-edtech-leadership/>

² Gallagher 2022 Cyber Insurance Market Conditions Report available online at <https://www.ajg.com/us/news-and-insights/2022/jan/2022-cyber-insurance-market-report/>

Petition for Rulemaking filed by CoSN and its partners in February 2021 which calls for updating the program’s firewall definition and inviting public comment about other ways the E-rate can help program participants strengthen their cybersecurity.³ Thank you for carefully considering these Reply Comments. We appreciate the FCC’s strong stewardship of this vitally important program.

Submitted,

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³ CoSN et al. Petition for Declaratory Relief and Petition for Rulemaking Allowing Additional Use Of E-Rate Funds For K-12 Cybersecurity (February 8, 2021).