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November 15, 2022

The Honorable Jessica Rosenworcel, Chairwoman  
The Honorable Brendan Carr, Commissioner  
The Honorable Geoffrey Starks, Commissioner  
The Honorable Nathan Simington, Commissioner

Federal Communications Commission  
45 L Street NE  
Washington, D.C. 20554

### **RE: Pilot Program for Cybersecurity Support**

Dear Chairwoman Rosenworcel and Commissioners:

Across the United States, school and library networks are under assault, subjected to an unrelenting barrage of cybersecurity attacks<sup>1</sup>. Computer systems are taken offline, disrupting education and administration; and personal data is sold on the dark web, destroying individual finances. A student's future should not be determined by a computer hacker.

The Commission can take immediate action to reduce the risk of cybersecurity attacks in communities by adopting a three-year pilot program via the existing E-rate discount program. This step would provide timely aid to schools and libraries, while offering the Commission an opportunity to develop long-term strategies with public input, in coordination with other federal agencies. The proposed plan is straight forward and simple to implement:

- 1) **Caps.** Offer up to \$60 million in annual Category Two funding for advanced firewalls.
- 2) **Comments.** Seek public comment on mechanisms for the FCC to support cybersecurity.
- 3) **Coordination.** Continue the Commission's interagency cybersecurity work.

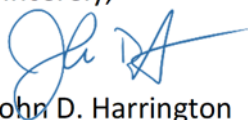
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<sup>1</sup> For example, see the letter submitted by Los Angeles Unified School District:  
<https://www.fcc.gov/ecfs/document/10914445618120/1>

- **CAPS.** Funds For Learning estimates that \$60 million annually would be a good down payment to protect schools and libraries<sup>2</sup>. While more funding likely is needed<sup>3</sup>, providing limited Category Two support for advanced firewalls would be a significant step in the right direction. This cap, which could be prioritized based on economic need, would be in addition to the overall Category Two budgets already in place. By taking this action, the Commission would provide much-needed support, reduce administrative burdens for applicants, and develop a richer dataset with which to estimate future needs – all while maintaining important safeguards on the demand for Universal Service support.
- **COMMENTS.** The safety and reliability of information in America’s schools and libraries is at risk. As CoSN and others have explained<sup>4</sup>, now is the time for a public debate about the role of the FCC in protecting school and library data networks. The Commission is well suited to lead a discussion about this important, far-reaching, and time-sensitive topic.
- **COORDINATION.** Under Chairwoman Rosenworcel’s leadership, the Commission is playing a leading role in the federal government’s response to cybersecurity threats<sup>5</sup>. Keeping our communications infrastructure safe and secure presents an on-going challenge that will require well-developed, well-executed, long-term solutions. As the agency responsible for implementing and enforcing America’s communications law and regulations, it is only appropriate that the Commission continue to coordinate and provide direction to secure our nation’s data networks.

This three-part proposal would provide measured financial support in a timely manner, while building a foundation for future support via public comment and interagency collaboration. I urge the Commission to take prompt and decisive action on this proposal to protect our nation’s school and library communications infrastructure.

Sincerely,



John D. Harrington  
Chief Executive Officer

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<sup>2</sup> See <https://www.fundsforlearning.com/news/2022/10/estimating-cybersecuritys-impact-on-c2-funds/>

<sup>3</sup> See <https://www.fundsforlearning.com/news/2021/10/fcc-can-help-k-12-cybersecurity/>

<sup>4</sup> See <https://www.fundsforlearning.com/news/2021/02/cybersecurity-petition-filed-with-fcc/>

<sup>5</sup> See <https://www.fundsforlearning.com/news/2022/02/rosenworcel-to-lead-relaunched-federal-interagency-cybersecurity-forum/>