

**Before the
Federal Communications Commission
Washington, DC 20054**

In the Matter of:

Schools and Libraries Cybersecurity Pilot Program)))	CC Docket No. 23-234
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Reply Comments of the American Library Association
(Submitted February 26, 2024)

The American Library Association (ALA)¹ appreciates the opportunity to submit these Reply Comments to the Commission’s Cybersecurity Pilot Program.² As we noted in our initial comments, the issue of the E-rate eligibility of cybersecurity tools has been an important topic in the library and school communities for at least the last five years.³ Reflecting the importance of this, we are pleased to see that comments filed in this *Notice* overwhelmingly support making cybersecurity tools fully eligible for E-rate support. Below we highlight both our agreement and our concerns on some of the comments initially filed.

We stated in our initial comments concerns that smaller libraries will lack the staff time and expertise to apply for the pilot program. To address this, we encouraged the FCC to require USAC to reach out and provide support for smaller libraries and schools. In addition to such outreach, another way to help address this issue is to encourage regional or consortium

¹ For more than 140 years, ALA has been the trusted voice for libraries of all types in advocating for the profession and the library’s role in enhancing learning and ensuring access to information for all Americans. ALA represents the nation’s 120,000 libraries, which includes over 16,500 public libraries.

² *In the Matter of Schools and Libraries Cybersecurity Pilot Program, Notice of Proposed Rulemaking (NPRM)*, WC Docket No. 23-234. November 13, 2023.

³ Comments filed by the American Library Association (ALA), pp. 1-3. January 29, 2024.

applications to include smaller libraries (and schools). This suggestion is included in comments from E-rate Central that said USAC and the FCC should “Take steps to encourage the larger and more resourceful pilot applicants to incorporate smaller less technically savvy entities in consortium applications.”⁴ And similar comments submitted by the Cybersecurity Coalition encourages the Commission to “Consider a preference for applications that aggregate the needs of multiple schools and libraries.”⁵ We agree with both E-rate Central and the Coalition and suggest the Commission consider offering some type of priority status for consortium applications that include smaller libraries and schools.

In our comments we proposed a one-year cybersecurity pilot program, while in its *Notice* the Commission proposed a three-year program. We are pleased to see that several commenters also advocate for just a one-year pilot, including the Ohio Information Technology Centers and ActZero.⁶ Their comments acknowledge the major concern we also have that a three-year program just adds unnecessary delay in the urgent need to make cybersecurity tools eligible for E-rate support. This concern is also reflected in comments from the Illinois Office of Broadband which acknowledges that a three-year program “Inherently imposes years of delay before the Commission can provide that much needed support beyond the small set of participants chosen to participate.”⁷ While we support a one-year pilot, with the assumed requirement of participants to engage in a competitive bidding process, and follow-up evaluation process, etc., we can understand why an 18-month pilot may be needed.

The Commission has proposed a cybersecurity pilot budget of \$200 million. In our comments we noted the difficulties in setting a budget before the application process is finalized. But we viewed \$200 million as likely sufficient and the Illinois Office of Broadband agrees with this amount.⁸ Funds for Learning suggests a budget of \$312 million.⁹ This is sufficient to cover 1,065 pilot participants, which represents 5% of funding year 2023 applicants. We do not think

⁴ Comments filed by E-rate Central, p. 2. January 29, 2024.

⁵ Comments filed by the Cybersecurity Coalition, p. 6. January 26, 2024.

⁶ Comments filed by the Ohio Information Technology Centers. p. 2, and ActZero, p. 1. Both comments filed January 29, 2024.

⁷ Comments filed by the Illinois Office of Broadband, p. 6. January 29, 2024.

⁸ *Id.*, p. 7.

⁹ Comments filed by Funds For Learning, p. 3. January 29, 2024. Their comments further state that a 2% sample yields 426 participants. We still think this is too high but it is more realistic than 1,065.

there is a need for this many participants. Rather, we believe the FCC’s purposes for the pilot can be achieved by 200-300 participants representing a cross section of small, medium, and large libraries and school districts.

One of the major reasons the Commission proposes a pilot is to determine costs because it "Must balance the benefits of particular services with the costs of adding them to the list of supported services."¹⁰ We shared this concern in our initial comments and think the best way to address this is to have applicants use their fixed Category 2 funding.¹¹ Comments filed by the Consortium For School Networking (CoSN), et al., agree with this approach.¹² We therefore support an overall increase in funding to make this possible.

In reviewing the initial comments, we saw there were several that advocated making advanced firewalls immediately eligible for E-rate support. For example, CoSN filed comments with the Commission requesting that it “open a special window in 2024 for applicants to seek Category Two funds for acquiring advance firewalls in 2024.”¹³ Furthermore, it requested that advanced or next-generation firewalls be added to the E-rate’s 2025 Eligible Services List (ESL). And the Ohio Information Technology Centers said, “The Commission erred when it declined to include next-generation firewalls to the ESL...”¹⁴ While our initial comments did not address this specific issue, we think adding advanced firewalls to the ESL—before the results of the pilot are known—has merit.

In our initial comments we cautioned the Commission not to define a static list of cybersecurity tools which might miss “Key segments that constitutes a comprehensive set of cybersecurity tools.”¹⁵ On this issue we agree with Cisco’s comments that defining cybersecurity tools must remain flexible to incorporate new tools to address new threats.¹⁶ And NCTA’s comments state that, “The available solutions are evolving, with new solutions being continuously introduced in

¹⁰ *NPRM*, footnote 54. November 13, 2023.

¹¹ Comments filed by the ALA, p. 3. January 29, 2024.

¹² Comments filed by Consortium of School Networking, et al., p. 4. January 29, 2024.

¹³ *Id.*, p. 10.

¹⁴ Comments filed by the Ohio Information Technology Centers, p. 5. January 29, 2024. The Ohio comment was made in reference to the *Notice* the Commission published on December 14, 2022, seeking comments on the status of advanced firewalls.

¹⁵ Comments filed by ALA, p. 6. January 29, 2024.

¹⁶ Comments filed by Cisco, p. 5. January 29, 2024.

the market.”¹⁷ In addition to flexibility on specific cybersecurity technologies, Microsoft asks for the eligibility of “Third-party security operations centers for managed services staffed 24/7 by expert cyber-analysts that detect attacks and stop their progression across multiple educational institutions.”¹⁸ It emphasizes that out-sourced security can be especially beneficial to smaller libraries that cannot afford sufficient in-house security facilities. We agree with Microsoft’s suggestion.

While we advocate for flexibility on specific cybersecurity tools, we do think that comments filed by the Michigan Statewide Educational Network provide an *example* of tools and services that should be eligible for funding.¹⁹ We especially support their listing of training resources because too often the critical need for staff training on cybersecurity is not given sufficient attention. In further support of this critical issue, comments from E-rate Central state that, “Training, whose E-rate eligibility has traditionally been limited, should be a major focus of the cybersecurity pilot.”²⁰

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In conclusion, it is obvious from the comments initially filed that there is widespread support for adding comprehensive cybersecurity tools to the list of E-rate eligible services. We are confident the results of the Pilot Program will also demonstrate a clear need for the Commission to make such tools eligible for E-rate support.

Respectfully submitted,

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¹⁷ Comments filed by NCTA, p.4. January 29, 2024.

¹⁸ Comments filed by Microsoft, p. 3. January 29, 2024.

¹⁹ Comments filed by the Michigan Statewide Educational Network, pp. 8-10. January 29, 2024.

²⁰ Comments filed by E-rate Central, p. 3. January 29, 2024.

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