

3) Eligibility of comprehensive security tools.

1) Changes or elimination of the Category 2 subcategories.

In the initial comments filed by SECA and FFL both parties articulate the issues applicants now have in trying to navigate the proper Category 2 (C2) subcategories of hardware and services. For example SECA states, “Certain Category Two **services** may fall under either basic maintenance of internal connections or managed internal broadband services, or both.”³ SECA asks that the final version of the 2021 Eligible Services List include a reference to alert applicants that whatever services or hardware they request can fall into more than one C2 subcategory. We note that Funds For Learning goes much further in its comments and recommends that the C2 subcategories be eliminated entirely. As it notes, “Eliminating the use of sub-categories would improve the application process for schools and libraries, simplify the review and commitment process for USAC, and reduce delays and denials in funding commitments.”⁴ We think that FFL makes a persuasive argument to eliminate the C2 subcategories and hope the Commission will seriously consider acting on this recommendation.

2) Eliminating cost allocation based on what equipment is attached to the cabling or data distribution equipment.

During the application review process reviewers are requesting some applicants to remove the cost of ineligible equipment. FFL notes that there are no published criteria to help determine what equipment is eligible or ineligible. Because of this lack of transparency FFL correctly states that “As a result, schools and libraries are left guessing as to which network devices can be connected to discounted cabling and data distribution equipment.”⁵ We also think SECA’s comment succinctly articulates the issue when it states, “Does the Commission really want to get into the minutiae of deciding what connected devices serve—or do not serve—an ‘educational purpose’ and thus impact the eligibility of the internal connection component?”⁶ We ask the

³ SECA Comments, p. 4.

⁴ FFL comments, page 12.

⁵ FFL Comments, page 8.

⁶ SECA Comments, page 8.

Commission to make it clear that any device—even if the device itself is not E-rate eligible—can be connected to C2 eligible equipment or cabling with no need for cost allocation.

3) Eligibility of comprehensive security tools.

E-rate eligibility of security tools has been an issue for our libraries and schools predating this Notice. For example, in C2 comments ALA filed on September 3, 2019, we stated, “Considering how essential robust network is to our libraries (and schools)... we strongly encourage the Commission to broaden the definition of E-rate eligibility to include all segments of network security.”⁷ Both SECA and FFL strongly support the eligibility of network security tools in their comments. We especially encourage the Commission to review FFL’s detailed narrative on this issue (p. 2-8). We also support SECA’s position that if the Commission believes this proceeding is not the proper venue to address security eligibility that it open a separate proceeding to specifically address this issue.⁸

We look forward to the Commission’s action on incorporating the above recommendations into the 2021 Eligible Services List.

Respectfully submitted,

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⁷ Reply Comments of the American Library Association. September 3, 2019, page 4 (<https://ecfsapi.fcc.gov/file/1090340163387/ALA%20Category%20%20Reply%20Comments%2009032019.pdf>).

⁸ We also note that on August 20, 2020, CISCO filed for a waiver to allow applicants to receive E-rate funding for network security software for FY 2020 and 2021. If network security cannot be approved in this Eligible Services List proceeding we support the Cisco’s waiver request for FY 2021. (<https://ecfsapi.fcc.gov/file/10820400607480/Cisco%20Security%20Waiver%20Petition%2008202020.pdf>).