August 7, 2023

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Proposed FCC Schools and Libraries Cybersecurity Pilot Program

Dear Chairwoman Rosenworcel:

Our coalition of national education and library groups welcomes your proposal to establish a pilot program to support cybersecurity services for K-12 schools and libraries. The proposed pilot holds significant promise to inform later modernization of E-rate Category 2 and possibly any other relevant federal programs to help schools and libraries address cybersecurity threats to their networks and sensitive private data. As you prepare a Notice of Proposed Rulemaking for the cybersecurity pilot, we encourage you to seek public comment on several critical policy decisions, including the pilot program's: (1) duration and form; (2) priority applicants; and (3) ultimate goals.

First, we urge you to invite public comment on the benefits of shortening the cyber pilot's duration so that the program's outcomes can be used to modernize E-rate Category 2 prior to the next five-year budget cycle (FY 2026-2030). This timeline is ambitious, but achievable, and would enable prompt expansion of the program and adjustments to help more schools and libraries bolster their cybersecurity over the long term. This faster timeline would be best accomplished through a single application window that would remain open until the cybersecurity pilot funds provided by the Commission are exhausted. The application process must also be low burden and align whenever possible with tools and concepts that are familiar to E-rate applicants. Given the scope of the problem and the serious and often long-term consequences of cyberattacks for schools, libraries, and individuals, time is of the essence.

Second, we request that you invite public input on prioritizing distribution of pilot funds to schools and libraries that need the most help. Compared to more affluent communities, schools and libraries in high poverty communities struggle with insufficient technology budgets and lack of staff expertise to properly address critical network security needs. This cybersecurity poverty gap harms low-income communities when student and patron data are stolen and schools and libraries are forced to close. Considering this context, we encourage you to prioritize pilot applications submitted by schools and libraries in both rural and urban high poverty areas. While applications should be prioritized using the E-rate program's existing poverty indicators, with the limited funding available we are very much concerned that many thousands of applications will still be submitted that have no realistic chance of being funded. To help address this issue we encourage the Commission to seek comments on additional qualifications or conditions that could be applied to ensure a more realistic number of applications.

In relation to the actual application process, we encourage the Commission to use the forms and follow-up procedures currently used by the E-rate program. Doing this will save considerable time in not needing to stand-up a new application process. The E-rate process is well understood by the school and library leaders that will be tasked with filing cybersecurity pilot applications.

Finally, we encourage you to invite public comment about the cybersecurity pilot's purpose and goals. The pilot program's funding is needed desperately by schools and libraries in the near term, but the program's primary goal should be to provide insights and data about how to best modernize the E-rate Category 2 to include cybersecurity permanently. The Commission must leverage the pilot's impact on expanding cybersecurity infrastructure as well as the participants' experience with the application process to improve the next Category 2 budget cycle.

Thank you for carefully weighing these ideas for the upcoming rulemaking. We eagerly await the issuance of the NPRM. Public input will undoubtedly enrich the pilot program's development and later effectiveness. Improving cybersecurity is paramount, and we pledge to support the Commission's new effort to both connect and protect our schools and libraries. Thank you for your attention to this urgent matter.

Sincerely,

Access Humboldt

American Library Association

California State Library

Consortium for School Networking (CoSN)

Friday Institute, North Carolina State University

Internet2

Link Oregon

Schools, Health & Libraries Broadband Coalition

SERRC - Alaska's Educational Resource Center

UNITE-LA

Cc: Commissioner Carr, Commissioner Starks, Commissioner Simington