Before The
Federal Communications Commission
Washington, D.C. 20554

In The Matter of	)	
	)	
Modernizing the E-rate Program	)	WC Docket No. 13-184
For Schools and Libraries	)	
	)	

Comments of the
SCHOOLS, HEALTH & LIBRARIES BROADBAND (SHLB) COALITION

The Schools, Health & Libraries Broadband Coalition ("SHLB Coalition" or "SHLB") respectfully submits these comments on the proposed FY 2022 Eligible Services List (ESL).[1] The SHLB Coalition is a broad-based public interest organization with over 300 members who share the goal of promoting open, affordable, high-quality broadband for anchor institutions and their communities.[2]

SHLB recommends that the ESL be amended to support the costs of providing Wi-Fi on school buses and cybersecurity. Both of these issues have previously been raised in other proceedings, but without a final decision. The importance of making these costs eligible for E-rate support has grown over the past year during the current COVID public health emergency, and will be even more important afterwards. The SHLB Coalition believes that the Commission should find a way to provide E-rate funding for these services and equipment because they would both fulfill the Commission's goals of strengthening the nation's schools and libraries against cyber-attacks and promoting broadband deployment, adoption and use, particularly for students in remote, rural and Tribal lands.

1. **The Commission should make the expenses of providing Wi-Fi on school buses eligible for E-rate support.**

Wi-Fi technologies have become widely available in the past few years, especially as schools and libraries developed emergency plans to promote remote learning and remote library access while the

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[1] "Wireline Competition Bureau Seeks Comment on Proposed Eligible Services List for the E-rate Program," WC Docket 13-184, released August 27, 2021, (DA 21-1062).
[2] A complete list of our members is contained at http://shlb.org/about/coalition-members.

school and library buildings were closed due to the COVID-19 pandemic. Indeed, Wi-Fi "hot spots" have provided immediate relief to thousands of communities across the country. The Congressional legislation creating the Emergency Connectivity Fund (ECF) program explicitly provides funding for hot spots and Wi-Fi access on school buses, which demonstrates Congressional support for these critical services.

Digital equity for students and library patrons has become more imperative than ever. Roughly thirty percent of households do not have broadband access at home today, and this percentage can be much higher in lower-income neighborhoods. School bus Wi-Fi can provide an important and cost-effective way to provide internet access to those who need it. School bus Wi-Fi is typically used to provide Internet access to students traveling on their daily school bus routes to or from home, or to and from school events, such as sporting or other off-campus events, and field trips. Wi-Fi also provides additional benefits that enhance student safety. School systems often report a drop in behavior problems on buses with Wi-Fi access.

Even when schools are closed, school districts have started re-purposing their Wi-Fi equipped buses to create community Internet hotspots for students and their families, such as in Austin, TX and Albuquerque, NM.

Bi-partisan legislation has also been introduced in Congress to make Wi-Fi on school buses eligible for E-rate support.[3] Senator Lujan, Senator Graham and six other Senators introduced S.724, the "E-Rate Support for School Bus Wi-Fi Act", and Rep. Welch introduced the companion bill, HR 1673 in the House earlier this year. This legislative action demonstrates Congressional support for this type of service. The Bureau can move forward without legislation, however. Students' use of Wi-Fi on buses for completing homework assignments is clearly an educational purpose that satisfies the requirements of section 254. Moreover, the Commission itself has determined that a school bus driver's use of mobile phone service while driving students to and from school would be an appropriate use of E-rate funds.[4] Enabling Wi-Fi for student instruction would be even more directly aligned with the purpose of the program.

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[3] https://stnonline.com/news/u-s-senate-bill-seeks-expanded-school-bus-wi-fi/.

[4] *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Second Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 9202, ¶ 19 (2003).

2.   The Commission should make cybersecurity expenses eligible for Category 2 E-rate support.

The SHLB Coalition earlier this year joined several other school and library organizations in filing a petition asking the FCC to make cybersecurity expenses eligible for E-rate support. Cybersecurity is not a "nice to have" add-on; it's an essential component for any online activity. The need for this relief is more urgent than ever, as both schools and libraries have been subjected to an increasing number of cyberattacks over the past year. The FBI issued a joint advisory last December 2020 based on an increase in ransomware attacks against K-12 educational institutions. Many cyber-attacks try to obtain confidential student data and threaten to leak it unless organizations pay a ransom. According to one source, the "number of reported ransomware incidents involving K-12 schools jumped from 28% – from January through July – to 57% in the Fall.[5]

Cyber-attackers are impacting libraries as well. The Boston Public Library – the nation's oldest large city library – suffered a significant cyber-attack less than one month ago.[6] According to an article published by Public Library Association, "Libraries are at higher risk than other organizations, . . . libraries rely heavily on layers of IT infrastructure, like electronic catalogs, public wifi access, and public computing terminals. IT budgets at public libraries are not as comprehensive as in other organizations."[7]

Allowing cybersecurity expenses to be eligible for Category 2 E-rate support does not require the Commission to alter its budget approach for Category 2 expenses, as schools and libraries would have the flexibility to choose whether to use their Category 2 support for cybersecurity or other expenses without changing the size of the budget.

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[5] https://umbrella.cisco.com/blog/cisa-reports-increased-ransomware-attacks-targeting-k-12-school-districts.

[6] https://www.boston.com/news/local-news/2021/08/27/boston-public-library-cybersecurity-attack/.

[7] http://publiclibrariesonline.org/2021/05/ransomware-attacks-at-libraries-how-they-happen-what-to-do/.

Conclusion

SHLB urges the FCC to amend the eligible services list to make cybersecurity costs and Wi-Fi on school buses eligible for E-rate support.

Respectfully submitted,

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