



## DEPARTMENT OF ADMINISTRATIVE SERVICES

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

RE: WC Docket No. 13–184

Tuesday, January 17, 2023

To the Honorable Chairwoman and Commissioners,

The Connecticut Commission for Educational Technology submits this letter concerning Docket 13-12-184, Use of E-Rate Funds for Advanced or Next-Generation Firewalls and Other Network Security Services.

The Commission is an independent group formed in 2000 by the Connecticut General Assembly (CGA), composed of 24 leaders from education, business, information technology, and government. The Commission is empowered by the CGA to envision, coordinate, and oversee the management and successful integration of technology in Connecticut's schools, libraries, colleges, and universities. As the state's principal educational technology advisor, the Commission works to ensure the effective and equitable use of resources and engender cooperation and collaboration in creating and maintaining technology-based tools for use by all the people of Connecticut.

One means to ensuring equity of access to learning opportunities is through the Connecticut Education Network (CEN), which connects virtually every K – 12 district, college and university, library, and museum in Connecticut. As the body that launched and governs CEN, the Commission underscores the critical nature of having proper cybersecurity protections in place. CEN provides statewide distributed denial of service (DDoS) mitigation to the thousands of institutional members it connects. During the last calendar year, CEN mitigated more than 200 attacks, diverting more than 20 terabytes of malicious traffic. Each such attack threatens to bring learning and operations to a standstill, given the deep integration of and dependence on technology within today's learning institutions. The volume and frequency of such attacks continue to increase, and DDoS incidents represent



just one type of cyber-attack that schools, libraries, and institutions of higher education face every day.

We share this example to illustrate a simple and fundamental point: The E-rate program exists to provide equity of access to learning through modern digital learning environments. That means providing not just for high-speed connections but also safe and reliable ones. In fact, not ensuring the protection of broadband connections through next-generation firewalls and other cybersecurity services reduces the value of investments in core circuits (Category 1) and school-level networking (Category 2).

Expanding eligibility will not require an increase in the annual funding cap for the E-rate program. According to the Universal Service Administrative Company (USAC) open data tools, for the last available year of data (2021), USAC awarded \$1.7B of the \$2.7B in total requests, against a funding cap of \$4.456B. Last year's \$2.7B funding surplus seems more than adequate to account for the expanded funding requests if the FCC were to fund cybersecurity protections under Category 2.

Many of our educational institutions received unprecedented funding to support digital learning during the pandemic. Unfortunately, there are no long-term funding sources to sustain this expanded technology footprint. The expansion of Category 2 eligibility to include cybersecurity protections would help offset these new costs while helping to ensure our teachers, educators, and administrators can appreciate secure and reliable connections.

For these reasons, the Commission enthusiastically supports the Federal Communications Commission (FCC) allowing for Category 2 E-rate funding to cover the full cost of firewall and other cybersecurity services.

Sincerely,

Mark Raymond  
State Chief Information Officer  
Chair, Connecticut Commission for Educational Technology