Before the Federal Communications Commission
Washington DC 20554

In the Matter of
Addressing the Homework Gap Through the E-Rate Program

Reply Comments of the State Associations Representing Public School Superintendents

INTRODUCTION

The undersigned organizations, representing state superintendent associations across the nation, respectfully submit these Reply Comments urging the Federal Communication Commission (the “FCC”) to establish its proposed school and library cybersecurity pilot program. The pilot, once launched, will help address a critical need for initial cybersecurity assistance for our nation’s schools and libraries, and will generate invaluable data to better inform future and on-going federal efforts on education cybersecurity policy decisions.

Our associations represent school superintendents and system administrators across 46 states. Our members are committed to integrating technology into all aspects of their districts, including teaching, learning and operations. Through the schools and libraries program (“E-Rate”), as administered by the FCC, schools have been able to transform access to broadband connectivity for students and teachers. With an increased online presence, however, comes increased cybersecurity risk. The risks associated with cybersecurity breaches or attacks can be swift, severe, and far reaching, and school system leaders are constantly working to protect their networks and the invaluable and confidential health, employment, educational and other data they store.

We strongly support the FCC’s proposed school and library cybersecurity pilot program. We urge the FCC to move forward with its pilot and focus on an application and implementation process that:

- Generates data the FCC and other federal entities can use to evaluate and better inform future and enduring federal cybersecurity policy improvements, both within and outside of the E-Rate program;
- Is efficient and targeted in its data collection, working to create a dataset that can be readily available for decision-making on next steps for federal cybersecurity support;
• Preserves the proposed three-year timeline while allowing an expedited timeline for participants whose cyber plan can be carried out more quickly (eligible participants should receive their funding in one lump sum and be able to spend down over an 18 to 36-month timeframe);
• Awards the full proposed $200 million to applicants while acknowledging the initial investment would be but a first step in addressing a pressing reality that will be exponentially more expensive; and
• Allows program beneficiaries to work across school district boundaries.

We align more generally with the comments as filed jointly by our national organization (AASA, The School Superintendents Association) and other national organizations including the school business officials, rural educators, educational service agencies, independent schools, Catholic schools, teachers unions, educators, principals, counselors, and more.

Thank you for opportunity to weigh-in on the particulars of the Commission’s cybersecurity pilot proposal and we look forward to working with the FCC as this matter proceeds.

SIGNING GROUPS

Alaska Superintendents Association
School Superintendents of Alabama
Arkansas Association of Educational Administrators
Arizona School Administrators
Association of California School Administrators
California County Superintendents
Colorado Association of School Executives
Connecticut Association of Public School Superintendents
Delaware Association of School Administrators
Florida Association of School Administrators
Georgia School Superintendents Association
School Administrators of Iowa
Idaho Association of School Administrators
Illinois Association of School Administrators
Indiana Association of Public School Superintendents
USA/Kansas - KSSA
Kentucky Association of School Administrators
Massachusetts Association of School Superintendents
Public School Superintendents Association of Maryland
Maine School Superintendents Association
Michigan Association of School Administrators
Minnesota Association of School Administrators
Missouri Association of School Administrators
Mississippi Association of School Administrators
School Administrators of Montana
North Carolina Association of School Administrators
North Dakota Association of School Administrators
New Hampshire School Administrators Association
New Jersey Association of School Administrators
New Mexico Coalition of Educational Leaders
Nevada Association of School Superintendents
New York State Council of School Superintendents
Buckeye Association of School Administrators
Oklahoma Association of School Administrators
Coalition of Oregon School Administrators
Pennsylvania Association of School Administrators
Rhode Island School Superintendents Association
South Carolina Association of School Administrators
School Administrators of South Dakota
Tennessee Organization of School Superintendents
Texas Association of School Administrators
Virginia Association of School Superintendents
Vermont Superintendents Association
Washington Association of School Administrators
Wisconsin Association of School District Administrators
West Virginia Association of School Administrators
Wyoming Association of School Administrators