

Before the Federal Communications Commission  
Washington DC 20554

In the Matter of )  
 )  
Addressing the Homework Gap ) WC Docket No. 21-234  
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