**UEN Comments re
Cybersecurity Equipment and Services as Part of E-Rate**October 12, 2021

The Urban Education Network of Iowa, which is a consortium of 20 of Iowa’s largest school district representing nearly 40% of Iowa’s public school students, supports the comments filed by the Consortium for School Networking responding to the Wireline Bureau's request for input on the 2022 E-rate Eligible Services List (WC Docket No. 13-184).

Urban school districts that participate in the E-rate program would greatly benefit from having the flexibility to use the program to improve cybersecurity. Cybersecurity and the privacy of student data are the top two technology priorities based on the Consortium for School Networking's (CoSN) national State of EdTech Leadership 2021 Report ([www.cosn.org/focus-areas/leadership-vision/...](https://nam02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.cosn.org%2Ffocus-areas%2Fleadership-vision%2Fstate-edtech-leadership&data=04%7C01%7Ccculbertson%40dbqschools.org%7Cdac66acfa0dc4093ea1b08d98c9fd7f2%7C9589b92826764f308145b529e593f894%7C0%7C0%7C637695440502061451%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=2JFZ5OfdRFw0yaTx4XQAIqKZbJEHuAwPNz83I2zejgk%3D&reserved=0)) yet specific cybersecurity risks continue to be generally under-estimated. Better protecting our networks and the confidential data of our students and staff is essential. Unfortunately, schools are now among the biggest targets of cyberattacks, including costly and damaging ransomware demands. Attacks cause loss of instructional time, expose students and staff to identity theft and other privacy violations, and waste public resources desperately needed for educational purposes. Expanding the Eligible Services List to cover cybersecurity expenditures including but not limited to modern firewalls and related features would be a helpful step forward as districts take much broader actions to protect their networks and data. We encourage you to make this change to the Eligible Services List for 2022.

The Urban Education Network also supports CoSN's recommendation to permit the use of E-rate funds for connecting students to Wi-Fi on school buses when such connectivity is for educational purposes. Many students travel long distances to and from school, as well as to other programs and activities, each day. We agree with CoSN that equipping buses with Wi-Fi will provide an opportunity for these students to use this time productively for homework and other learning. We strongly urge you to make this long-needed change to the Eligible Services List for 2022.

Thank you again for the opportunity to provide input.

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