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

The Rural School Advocates of Iowa, a nonprofit advocacy group representing over 130 of Iowa’s rural school districts and their 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).

The Rural School Advocates of Iowa support 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 rural students travel long distances to and from school 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. Those districts providing connectivity on school buses have also seen fewer disciplinary instances as students are engaged in productive work while being transported.

Rural school districts that participate in the E-rate program would also 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 strongly urge you to make these changes to the Eligible Services List for 2022.

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