Before the
Federal Communications Commission
Washington, DC 20054

In the Matter of:

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Schools and Libraries Cybersecurity Pilot	)	**CC Docket No. 23-234**
Program	)	

Comments of the American Library Association
(Submitted January 29, 2024)

The American Library Association (ALA) is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. For more than 140 years, ALA has been the trusted voice for academic, public, school, government, and special libraries, advocating for the profession and the library's role in enhancing learning and ensuring access to information for all. ALA

3,000 libraries, which includes over 17,000 public library locations.

We appreciate the opportunity to submit these comments on the

Pilot Program.[1] The issue of comprehensive cybersecurity tools being eligible for E-rate support has been a very active topic in the library and school communities for at least the last five years. We briefly document some of these activities

Commission to broaden the definition of E-rate eligibility to include all segments of network [2] A year after this filing, in September 2020, we again encouraged the inclusion of cybersecurity tools.[3] And we continued our quest for security tool eligibility in comments we filed on the Eligible Services List (ESL) for the 2023 E-rate funding year.[4]

We provide the above information to document the widespread support in the library and school communities for the E-rate eligibility of cybersecurity tools. ALA and the great majority of organizations who filed comments related to the December 2022 *Notice* hoped the Commission would release a follow-up Order making cybersecurity tools fully eligible for E-rate support. Unfortunately, the Commission did not take such action. Instead, it opted for a limited Cybersecurity Pilot Program. The ALA supports this pilot proposal but also calls for more serious and urgent action to address this crisis. The Background section of the November 2023 *Pilot Program* NPRM documents numerous security issues and network breaches our libraries and schools constantly confront; cybersecurity tools available through the E-rate program are needed now.

We offer the following comments and observations on various aspects of the *Pilot Program NPRM*.

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Pilot program application process: We agree that the application process needs to be done outside of the normal E-rate application process, and we also agree that this process and other aspects of the Pilot Program should be administered by USAC. One concern we have is the detailed information the Commission proposes to require as part of the application process.[13] For example, it wants applicants to d

Pilot budget: It is

vs. a more independent selection process. To help identify prospective library applicants from small and rural communities, we suggest that USAC work with ALA and state library agencies. State libraries, in particular, are in a good position to help identify participants from under-resourced communities who are willing to apply and willing to commit the time needed to fully participate in the Pilot Program.

Eligible services and equipment/security measures: The Commission seeks input on how