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# Los Angeles County Office of Education

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Serving Students ■ Supporting Communities ■ Leading Educators

Debra Duardo, M. S.W., Ed.D.  
Superintendent

December 5, 2022

Los Angeles County  
Board of Education

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20552

James Cross  
President

Yvonne Chan  
Vice President

RE: Ex Parte Submission  
Modernizing the E-Rate Program for Schools and Libraries -- WC Docket No.  
13-184  
Schools and Libraries Universal Service Support Mechanism -- CC Docket No.  
02-6

Judy Abdo

R. Michael Dutton

Betty Forrester

Stanley L. Johnson, Jr.

Dear Secretary Dortch:

Monte E. Perez

The Los Angeles County Office of Education (LACOE) joins other educational agencies to urge the Federal Communication Commission to update the 2023 E-Rate Eligible Services List (ESL) to better address Los Angeles County's growing and demanding cyber security needs for our schools. Specifically, we encourage the Commission to update the ESL to permit cybersecurity systems and services to be an allowable Category 2 E-Rate expense, including covering modern firewalls and related services (such as Intrusion Detection Systems that are built into modern firewalls).

Our public schools serve 1.3 million students in Los Angeles County and employ thousands of teachers and staffs. Like other school districts and education agencies across California and the United States, our enterprise networks are under attack daily by bad actors that threaten our schools' use of the internet, student instruction, administrative and financial operations, and worst of all, the confidential student and employee data that we manage. To stand a chance against these attacks, we require a combination of expert staffing and modern security systems. The costs of these personnel and technology systems, including insurance for mitigating cyber-attack risks and exposure, have become increasingly costly and the costs continue to increase.

Given the seriousness of this challenge facing all K-12 agencies, we respectfully urge the Commission to permit E-Rate application in 2023 and beyond to use Category 2 funds for cyber security infrastructure and services. This use is consistent with the Commission's criteria for determining the non-telecommunications services to be covered by the E-Rate program, and the change

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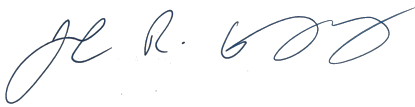
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necessary to ensure continued consistent delivery of high-speed broadband service to schools and students. Given that the E-Rate program has been operating well below its \$4.3 billion cap, we see no reason to prevent applicants from using E-Rate to protect the enterprise networks that the E-Rate program already funds. Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Jose R. Gonzalez". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Jose R. Gonzalez  
Chief Technology Officer  
Technology Services

RZ:rc