

October 4, 2024

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: **Ex Parte Submission**

Schools and Libraries Universal Service Support Mechanism – WC Docket No. 13-184

Dear Ms. Dortch:

On Friday, October 4, 2024, representatives of Funds For Learning LLC (“FFL”) met with Johnnay Schriber and Saswat Misra of the Federal Communications Commission (FCC) to discuss the proposed E-rate Eligible Services List for FY 2025. FFL representatives in attendance were Verlyne Jolley, Executive Director of Client Services, Jonathan Wilson, Client Services Manager, and Brian Stephens, Senior Compliance Analyst.

DNS and DHCP Clarification

FFL emphasized the importance of explicitly including Domain Name System (DNS) and Dynamic Host Configuration Protocol (DHCP) services in the FY 2025 Eligible Services List. These services are critical to the function of local area networks (LANs) in schools and libraries. Although these services are currently supported indirectly through eligible equipment, their explicit inclusion would clarify their eligibility and reduce confusion for applicants, service providers, and administrators. FFL emphasized that this is not a request to add new services but rather to clarify existing eligibility, which aligns with the FCC’s principle of technological neutrality. We discussed that DHCP and DNS are appropriately classified as Category Two services.

Funds For Learning’s Support for Advanced Firewalls in E-rate

FFL supports the inclusion of advanced firewalls under Category Two funding in the E-rate program, as highlighted in comments submitted by the State E-rate Coordinators' Alliance (SECA). We agree that modern cybersecurity threats demand more robust firewall solutions than those currently categorized as "basic." Including modern firewalls as eligible for E-rate funding will provide schools and libraries with stronger protections against these evolving threats and reduce the confusion and administrative burden caused by current cost-allocation requirements. By incorporating advanced firewalls into the E-rate program, we can ensure broader security coverage without imposing additional financial strain.

Respectfully submitted,

/s/ Verlyne Jolley

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cc: Johnnay Schrieber, Saswat Misra