

# Washington Update



Oct. 24, 2023

Jill Canfield

General Counsel, VP of Policy

[Jcanfield@ntca.org](mailto:Jcanfield@ntca.org)



# Regulatory issues/priorities

Universal Service Fund

- ACAM Elections
- Future of the fund

Digital Discrimination

BEAD

Cybersecurity





# Open Issues - Support

---



# Enhanced ACAM (Alternative Connect America Cost Model)

- Optional(new)funding mechanism in exchange for (new) build out obligations
  - Longer support if build to higher speed, 100% build out
- Tied to not yet finished broadband maps – support may fluctuate
- Unelect?



# Future of USF

Much focus and \$ devoted to building, what about sustainability?


Dwindling contribution base

Series of positive bills (no traction)

Net Neutrality rulemaking

- If classify Broadband as a telecom service, would need to contribute
- BUT FCC choosing to forbear with no explanation

Court Challenge!

The background of the image is a dark blue-grey color. It features a network of white, stylized human figures. Each figure is positioned at a node of a web-like structure, where the nodes are connected by thin white lines. The figures are arranged in a way that suggests a global or interconnected network. The text "Adoption, Equity & Inclusion" is centered over this network.

# Adoption, Equity & Inclusion

# Adoption, Equity & Inclusion

- Affordable Connectivity Program
  - Implementation
  - Appropriations
- Lifeline
  - Future Applications/Relevance
  - Voice Subsidy
- Digital Equity Planning and Use
  - Affordability Measures

# BEAD

## Key Questions Include:

- What is a “High-Cost” Area for Matching? (F)
- What is “Extremely High-Cost” for Overriding of Fiber Priority? (S)
- State Challenge Processes (F → S)
- Scope of “low-cost option” and “affordability”? (S)
- Buy American and other Supply Chain Issues? (F)
- Part 200 (F)
- Scoring rubrics (S)







# Cybersecurity

---

# Why should you pay attention to cybersecurity?



Protect your networks and assets



The federal government is imposing regulations

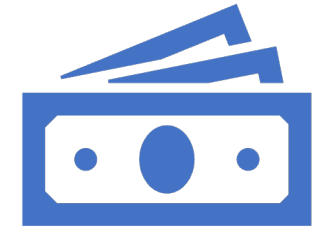
# Financial incentive



300,000 malware created  
daily



27% of malware breaches  
involve ransomware



Ransomware top cause of  
financial loss in SMEs

# Legal and regulatory “incentives”

- SEC rules on risk management, strategy, governance in incident response disclosure
- Cyber Incident Reporting for Critical Infrastructure Act
- FCC breach notification changes
- Government funding tied to cybersecurity requirements (EACAM, BEAD)







# E- ACAM Cyber Requirements

- Implement by Jan 1, submit to USAC by Jan. 2
- Reflect NIST Framework
- Reflect best practices (CISA Cross-Sector Performance Goals and Objectives)
- Incorporate Supply Chain Risk Management
- Submit substantive modifications to plan

# BEAD Cyber Requirements

- Attest that will have plan when apply for funds
  - Submit plan to State before allocation of funds
  - NTIA may request from the State
  - Based on NIST Cybersecurity Framework
  - Incorporate Supply Chain Risk Management Guidance
  - Submit changes
- 
- A large yellow triangle is positioned in the bottom right corner of the slide, pointing towards the top right.

# NIST Cybersecurity Framework





## Identify

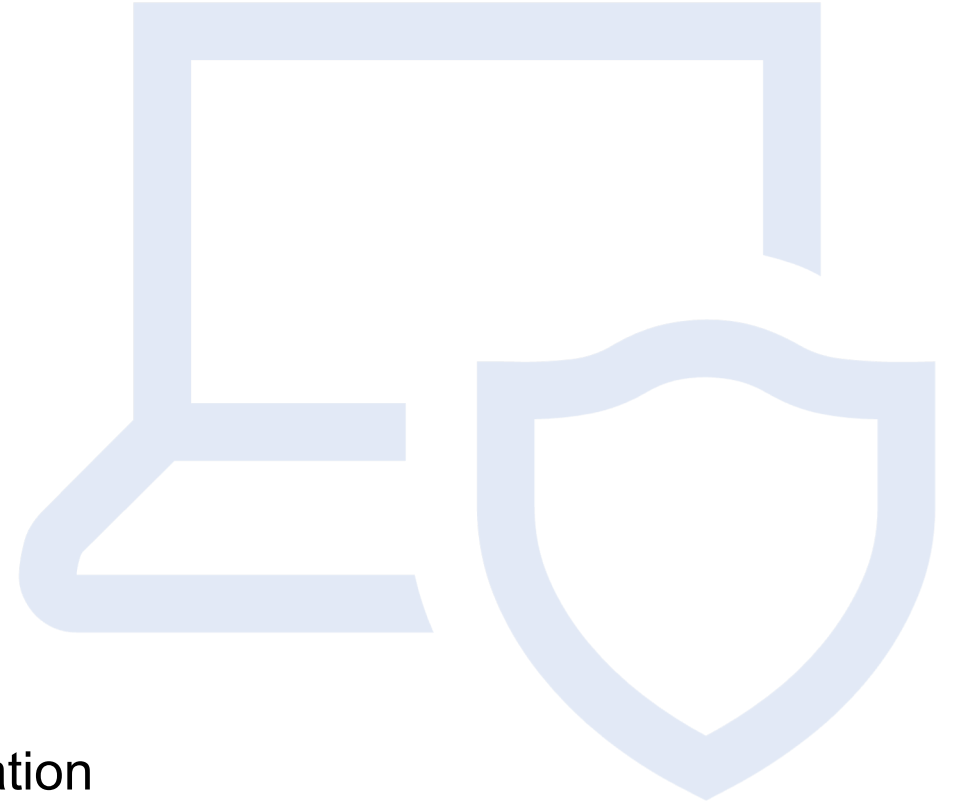
Organizational understanding of assets

Cybersecurity policies

Risk management team

Contracts with third parties require notification

Participation in information sharing forum







# CyberShare®

The Small Broadband Provider ISAC

Sign up: <https://www.cyber-share.org/>

# Protect

What safeguards do you have to ensure delivery of critical services?

- Manage IDs and credentials
- Password change policy
- Limit access to property, systems
- Train users
- Use MFA, Network Segmentation, Encryption
- Do backups and patches according to schedule

# Detect

- How do you discover a security event?
- Monitor access to building, sensitive information, email
- Monitor network for intrusions

# Respond

- How do you respond to a security event?
  - Do you have a written incident response plan (yes!)
  - Cybersecurity insurance
  - Do you remove user access, remove access to devices
  - Policy to report to relevant organization (CISA)
  - Vulnerability scanning



# Recover



What will you do after an event?



What is your plan for recovering and restoring service or access



How will you communicate event and response internally/externally

# NIST 2.0



Not an overhaul of Cybersecurity Framework

Will add (pull out to highlight) governance function

More specific information about supply chain risk management

## Additional requirements

- Supply Chain Risk Management
  - not a separate document, incorporate into your cybersecurity plan
- Cross-Sector Cybersecurity Performance Goals
  - Baseline set of best practices with known risk-reduction value
  - Aligns with NIST Cybersecurity Framework



# Questions?

Jill Canfield

[jcanfield@ntca.org](mailto:jcanfield@ntca.org)

[www.cyber-share.org](http://www.cyber-share.org)

Google: NTCA + cybersecurity series