





of national importance how to best address evolving and modernistic threats. The goals of the Commission and Cox are in alignment regarding cybersecurity, that is to ensure broadband networks are safe and protected from domestic and international threats.

First, Cox recommends the Commission utilize the federal requirements so uniform requirements exist in Nebraska, be that for the BEAD program administered by the Broadband Office or the NBBP administered by the Commission. Federal (NIST, CISA, etc.) Cybersecurity Risk Management requirements are based on well-developed industry standards and supported by expert agencies. The Commission should use the NTIA BEAD program Cybersecurity Security Risk Managements as an acceptable model and not add cybersecurity frameworks above and beyond those already required by federal broadband grant programs. Any additional requirements could impact carrier participation.

Second, due to the ongoing finalization of NTIA BEAD cybersecurity plans for companies, Cox recommends the Commission add the submission of a cybersecurity plan as a post-award requirement, rather than a requirement in the initial application or as a scoring criterion. However, Cox supports the submission of a cybersecurity plan as a post-award condition. Providing this material to the Commission if a 2024 NBBP grant is awarded is a reasonable request. The Commission should maintain the confidentiality of all cybersecurity material.

In closing, Cox thanks the Commission for this opportunity to provide input on the NBBP, and respectfully asks its comments to be taken into consideration.