

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	WC Docket No. 13-184
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
)	

**COMMENTS OF ARUBA, A HEWLETT PACKARD ENTERPRISE COMPANY
on the
DRAFT ELIGIBLE SERVICES LIST FOR SCHOOLS AND LIBRARIES
UNIVERSAL SERVICE PROGRAM FOR FUNDING YEAR 2018**

Aruba, a Hewlett Packard Enterprise company, applauds the efforts of the Federal Communications Commission to continue to improve the E-rate program, and appreciates the opportunity to file comments in response to the 2018 draft Eligible Services List (ESL). The results of the FCC’s E-rate Modernization Order have been noticeable. Since the Order took effect in FY2015, the program has funded all timely and eligible funding requests, not only for Category 1 services, but also for Category 2 services, which have been historically under-funded. Over the last 3 funding years, the E-rate program has committed more than \$6.5 billion, including \$2.2 billion for Category 2 services, and is continuing to issue Funding Commitment Decision Letters.

In the E-rate Modernization Order, the FCC stated that it would leave the record open on network security and other services to allow for further comment as it evaluates the changes in the first funding year (para. 121). Given the results of the FCC’s modernization efforts and the funding that remains available, we request the FCC to expand the FY2018 Eligible Services List to include services that are essential to enable safe and secure high-speed broadband connectivity in schools and libraries. School districts around the country are increasingly becoming the targets of cyberattacks against government infrastructure.¹

Policy Management Systems

Policy Management Systems are necessary to ensure that schools and libraries can offer students safe and secure Wi-Fi access. Policy Management Systems provide role-based policy management for users and devices (IT-managed and BYOD). They include enterprise-grade AAA, including RADIUS/TACACS+, 802.1X and non-802.1X services. Having a policy management system enabled will ensure that only devices that meet the security requirements of the school will be allowed onto the E-rate supported Wi-Fi network and granted appropriate access privileges, regardless of access method or device ownership, thus further protecting the eligible use of E-rate

¹ <http://www.govtech.com/security/Are-the-Dangers-of-Cyberattacks-Targeting-School-Districts-Being-Overlooked.html>

supported network resources. Securing the Wi-Fi access will also help to mitigate the unauthorized use of the Wi-Fi infrastructure, including E-rate supported high-speed internet connections, reducing the demand for unnecessarily higher bandwidth.

Self-Provisioned Network Management

As recognized in the E-rate Modernization Order, Network Management is essential to ensure the continuous operation of school and library networks. The program currently allows Network Management as part of a Managed Internal Broadband Services contract, and encourages applicants to “compare the cost-effectiveness of bids for self-provisioned networks with those for managed Wi-Fi contracts.” (Para. 127). However, under the FY2018 Draft Eligible Services List, Network Management is eligible only when it is provided by a third party, not when it is self-provisioned. In order to ensure that applicants can do a cost-effectiveness comparison and select solutions that fit their needs, we urge the FCC to provide Category 2 E-rate support for both third-party Network Management and applicant purchases of hardware and software components that perform the same functions. Allowing the applicants to compare costs of third party versus self-provisioned network management and select the best price option will help save the program money.

Multi-year Basic Maintenance of Internal Connections

Multi-year basic maintenance of internal connections (“BMIC”) contracts have several benefits, including that they often have a price advantage over single year support. By providing support for multi-year BMIC contracts, eligible in full during the first funding year, the applicant and the program will experience many benefits: cost savings, application simplification, extended use of equipment, and predictability. This modification to the 2018 Eligible Services List will not increase demand, as each applicant is still subject to the Category Two five-year budget. Rather, by taking advantage of the reduced cost of multiyear BMIC contracts, the program will save money. Not only will the program save money, it will also reduce the number of annual applications. This will free up USAC to focus on meeting the FCC’s goal of issuing all workable applications by September 30 of each funding year as applicants will only need to file a single application for the multiple years covered. Also, by ensuring proper maintenance of the eligible equipment, the life of the equipment will be extended, making better use of the E-rate funds.

Adopting these modest changes to the ESL will help the Commission fulfill its goal of providing schools and libraries with modern tools of education in a cost-efficient and forward-looking manner.

Respectfully submitted by:

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