

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

In the Matter of)	
)	
Petition for Rulemaking of)	RM-11841
Central Texas Telephone Cooperative, Inc.,)	CC Docket No. 02-6
Peoples Telephone Cooperative, Inc. and)	WC Docket No. 13-184
Totelcom Communications, LLC)	

**REPLY COMMENTS OF
REGION 10 EDUCATION SERVICE CENTER**

Region 10 Education Service Center (Region 10 ESC) respectfully submits these reply comments in response to the Wireline Competition Bureau’s public notice seeking comment on the above-captioned petition for rulemaking.¹ Because Region 10 ESC’s competitive bidding process was raised in the initial comments, we would like to provide more detail about our process.² In doing so, we hope to dispel some inaccuracies in the Texas Carriers’ Petition.

Based on our experience and the facts we share below, we believe the Texas Carriers’ Petition should be dismissed. Because the Texas Carriers’ Petition is primarily based on inaccurate statements and because other commenters have provided significant evidence as to the harms that would result from the adoption of the Texas Carriers’ proposals, the Commission should dismiss the Petition.

¹ *Wireline Competition Bureau Seeks Comment on Texas Carriers’ Petition to Prohibit Use of E-Rate Funds to Build Fiber Networks in Areas Where Fiber Networks Already Exist*, RM-11841, CC Docket No. 02-6, WC Docket No. 13-184, DA 19-493 (rel. May 30, 2019) (*Public Notice*); Petition for Rulemaking of Central Texas Telephone Cooperative, Inc., Peoples Telephone Cooperative, Inc. and Totelcom Communications, LLC, RM-11841, CC Docket No. 02-6, WC Docket No. 13-184 (filed May 22, 2019) (Texas Carriers’ Petition or Petition).

² See SHLB et al. Comments at 6. As we discuss below, Region 10 ESC believes that the Texas Carriers’ Petition tacitly referenced its competitive bidding process as well, although we cannot be certain given how little detail the Texas Carriers provided.

I. BACKGROUND

Before explaining why the Commission should not rely on the representations made in the Texas Carriers' Petition, Region 10 ESC would like to provide some context regarding the Texas Education Service Centers in general and the Region 10 ESC specifically. Texas ESCs provide valuable services for school districts in Texas and strive to obtain the best value for all tax dollars – local, state and federal.

Education Service Centers. Region 10 ESC is one of 20 regional service centers established by the Texas State Legislature in 1967 for the purpose of providing services to schools within defined geographic regions. ESCs are non-regulatory, have no taxing authority, and provide services for which local school participation is voluntary. Region 10 Education Service Center, located in Richardson, Texas, serves more than 865,000 students and 106,000 school staff (of which 56,000 are teachers) in more than 130 independent school districts, charters, and private schools across 10 counties in north Texas.

Education Service Centers in Texas, by charter, enable school districts to operate more efficiently and economically as well as implement initiatives assigned by the Texas Legislature or the Commissioner of Education. Region 10 ESC, like other ESCs in Texas, has a history of positive consortium-based outcomes for districts in numerous education-related areas. Region 10 ESC offers school districts and charter schools the option of more than 50 distinct co-ops or consortium service offerings on an annual basis. As detailed below, for decades a consortium network infrastructure has allowed Region 10 ESC to efficiently provide additional technology services for school districts without dedicated technology staff or whose tech staff do not have the skillset to manage complicated networks. School districts depend on the ESC to provide

firewall, web filter, wireless access point management, information security, and backup and disaster recovery, along with other services.

On March 10, 2016, Texas Governor Greg Abbott announced the Classroom Connectivity Initiative, a joint partnership between the Texas Education Agency, the regional education service centers, and the non-profit EducationSuperHighway. The initiative is designed to increase access to affordable, high-speed broadband and Wi-Fi access for K–12 public schools in Texas. In June 2017, the 85th Texas State Legislature appropriated state matching funds to reduce the local funding share for E-rate approved Category 1 special construction fiber projects by providing a dollar-for-dollar match. Both Governor Abbott and Commissioner of Education Mike Morath, as well as the Legislature, have thus endorsed the continuing role of consortia in expanding schools' access to robust broadband connectivity.

Region 10 Fiber Consortium. Region 10 ESC has an established history of providing technology services, including transport and Internet access, to local school districts and charters utilizing the consortium model. In 1997, Region 10 ESC established a consortium of districts providing T-1 access to more than 80 local school districts. In 2009, Region 10 ESC formed a wireless/microwave consortium with more than 40, mostly rural, districts participating. Once districts exceeded the demand the wireless network could deliver, districts requested Region 10 ESC help provide a stable and scalable network infrastructure to meet their growing broadband needs. In 2017, more than 60 districts and charter schools signed Letters of Intent and Letters of Agency to participate in the Request for Proposal (RFP) process for the Region 10 Fiber Consortium.

II. REGION 10 RECEIVED BIDS FROM MULTIPLE VENDORS FOR ITS FIBER PROJECT, WHICH RESULTED IN SIGNIFICANT SAVINGS FOR ITS MEMBER DISTRICTS

While the Texas Carriers' Petition does not reference any specific RFPs issued by Texas consortia, Region 10 ESC believes that its competitive bidding process for funding year 2018 is likely one of the ones the Petition criticizes, given that Peoples Telephone Cooperative operates within Region 10. As noted above, SHLB discussed Region 10 ESC's competitive bidding process in its opposition to the Texas Carriers' Petition. Accordingly, Region 10 ESC respectfully provides the following details about its competitive bidding process, which not only complied fully with the Commission's rules, but which took extra steps to encourage bids and maximum participation by vendors.

As explained above, school district participation in the Region 10 Consortium is completely voluntary. Local school boards voted as to whether to participate before Region 10 ever put the project out for bids. After the competitive bidding process was complete, each district again made a decision as to whether Region 10 would purchase services on its behalf.³

Region 10 ESC's RFP requested both dark fiber and leased-lit fiber bids and was left open for 51 days—significantly longer than the 28 days required by the E-Rate rules—giving all service providers ample time to understand the requirements, ask questions if necessary, and formulate their responses.⁴ Region 10 ESC held a pre-bid conference approximately two weeks after it released the RFP and encouraged potential vendors to ask questions.⁵ Region 10 ESC

³ Once a district decided to join the consortium project, Region 10 ESC asked for a four-year commitment to ensure it could cover the initial costs of the project.

⁴ Exhibit 1, RFP, at 3 (RFP Timeline).

⁵ *See id.* (announcing the date of the pre-bid conference, the deadline for asking questions, and the date by which Region 10 ESC would answer vendor questions).

noted twice in the RFP that it was willing to select more than one vendor in order to receive the best value.⁶

At the end of the bidding period, Region 10 ESC received eight bids from four vendors. Region 10 ESC received five leased lit fiber proposals and three leased dark fiber proposals. Because only five of the bids were for all of the circuits, ESC Region 10 used a per megabits per second (Mbps) standard to evaluate the price of the proposals fairly, instead of comparing total pricing. ESC Region 10 did not disqualify any bidder for not offering service to all proposed sites; instead, ESC Region 10 evaluated the bids based on the average Mbps price. After evaluating all bids, Region 10 ESC selected the most cost-effective solution: a leased lit fiber offering from Zayo. The price in the awarded contract was significantly less than bids Region 10 ESC received from other vendors.⁷

Before going into detail about how much money Region 10 ESC's competitive bidding process and the consortium approach saved the participating school districts and how much better service they were able to obtain, we pause here to note how little resemblance our competitive bidding process bears to the description in the Texas Carriers' Petition. The Petition states that "[s]maller providers that are already serving individual schools within the region . . . were unable to respond to the RFPs due to the sheer size of the requested WANs."⁸ But Region 10 ESC specifically welcomed bids from multiple vendors, so the "sheer size" of the requested services need not have been a deterrent to bidding, and in fact only five of the eight bids Region

⁶ *Id.* at 3 ("This contract may be awarded to a single vendor or multiple vendors as determined to provide the best value to the ESC Region 10 Consortium."); *id.* at 4, section 2.k (stating the same).

⁷ See Exhibit 2, Bid Evaluation Matrix (showing that Zayo's winning bid was significantly less expensive than the bids submitted by other carriers).

⁸ Texas Carriers' Petition at 2.

10 ESC received were for all of the circuits included in the RFP, as noted above. And as AASA, The School Superintendents Association pointed out in its comments, the three carriers that filed the Petition are well acquainted with the possibility of multiple-vendor bids, because they belong to the Texas Lone Star Network, and at least one of them has participated in a multiple-vendor response to a consortium’s RFP.⁹ Had the Texas Carriers had any interest in formulating such a bid in response to Region 10 ESC’s RFP, they could have attended the pre-bid conference, but none of them did, or they could have submitted questions, but none of them did.¹⁰ In addition, the Petition states that “only a few providers” responded to the RFPs.¹¹ But Region 10 ESC received bids from four providers—more than “a few”—and made every effort to encourage as many bids as possible, as we have described. In short, there is no support for the Petition’s allegation that the consortium approach deterred potential bidders.

As for the cost of the project, there is no question that the consortium approach saved the participating school districts—as well as the E-rate program and Texas taxpayers—an enormous amount of money. In funding year 2018, consortium members were paying from anywhere from \$0.41 per Mbps to a high of \$14.48 per Mbps for transport and Internet access services.¹² On average, school districts in Region 10 paid an average of \$5.45 per Mbps. Once the new WAN is constructed, Region 10 consortium members will pay an average of \$0.28 per Mbps through

⁹ AASA Comments at 2.

¹⁰ See Exhibit 3, Pre-Bid Conference Sign-In Sheet.

¹¹ *Id.*

¹² On the high end of the spectrum, for example, one school district is paying Peoples Communication, Inc. \$2,895 a month for 200 Mbps, which translates into \$14.48 per megabit.

the life of the contract.¹³ These figures are all pre-discount for eligible E-rate services. That means the program is paying even less—about \$.20 per megabit.

Just as important as the cost savings, Region 10 ESC’s competitive bidding process will result in vastly improved broadband service to participating school districts. Consortium districts will see on average a fivefold increase in bandwidth, giving teachers and students the ability to utilize technology in the classroom much more effectively. This collaborative effort has given consortium members greatly increased bandwidth capabilities at a much lower cost to districts and taxpayers, not to mention a lower cost to the E-rate program.

Finally, the Texas Carriers’ Petition suggested a “solution” to the problem that seems to be limited to themselves. It suggests that the Commission allow incumbent carriers a second bite at the apple after districts sign a contract for services where there is existing fiber. The vast majority (nearly 80 percent) of the Region 10 project will utilize existing fiber already installed by Zayo. The Consortium currently consists of 65 school districts, charter schools, and private schools, requesting 89 discrete circuits. In order to build out the fiber network to completion, the consortium will utilize 1,100 miles of fiber already in place, with a build of only 286 miles.

These facts refute the suggestion in the Texas Carriers’ Petition that the bids received in response to the RFP “did not necessarily propose the most cost-effective solutions” because they required the construction of additional fiber.¹⁴ An E-rate participant has only one way to judge which solution is the most cost-effective: by evaluating the bids it receives according to the criteria it has established, with price as the primary factor. The Texas Carriers did not submit bids and did not reach out to Region 10 ESC to explore the possibility of submitting bids, and

¹³ Region 10 ESC charges school districts based on their student populations.

¹⁴ Texas Carriers’ Petition at 2.

they present no evidence that any other solution could have matched the savings that the winning bid provided. Nor do they make any effort to argue that any bid they might have submitted could have matched the quality of service offered by the winning bid. The reality is that even taking the special construction costs into account, Zayo’s winning bid provided the best service to participating school districts at the lowest possible price. Further, if an individual school district thought that it could receive a better deal using a different technological solution or a different carrier, it was free to seek bids and sign a contract on its own—either before or after the competitive bidding process was conducted. The fact is, all of the participating districts found the Region 10 Consortium offered the best value.

III. THE TEXAS CARRIERS’ SUGGESTIONS WOULD HARM THE E-RATE PROGRAM, NOT IMPROVE IT

The Texas Carriers’ Petition suggested a “solution” to the problem that seems to be limited to themselves. The Petition’s proposals—along with those made by other commenters in the initial round of comments—would harm the E-rate program and its beneficiaries without any resulting benefit.¹⁵

First, the Texas Carriers seem to believe that installing fiber where some already exists in a high-cost carrier region is somehow a duplicative subsidy. It is not. The E-rate subsidies are meant to help schools and libraries purchase affordable broadband services that meet their educational needs. The high-cost program, in contrast, supports carriers that serve areas where no business case can be made for affordable service without those subsidies. If a competitor can provide the service at a less expensive rate or a higher quality, the Commission should not care

¹⁵ Petition at 4-5; Comments of USTelecom—The Broadband Association, RM-11841, *et al.* (filed July 1, 2019), at 6; Comments of Wes-Tex Telephone Cooperative, Inc., RM-11841, *et al.* (filed July 1, 2019), at 1.

whether facilities exist or not—the program is getting the best value with the competitor’s services.

Second, the Texas Carriers’ Petition would further delay an application review process that has already cost the Region 10 ESC a year in starting its project. Region 10 submitted its funding year 2018 application on April 5, 2018. It has still not received a funding commitment for FY 2018, and we are now in FY 2019. In May 2019, USAC asked the Region 10 ESC to explain why it was requesting funds for new fiber “when there is an existing fiber service provider in the immediate geographic vicinity.” This obviously is not an E-rate rule, and Region 10 ESC is not sure why USAC asked that question. Region 10 ESC responded with the information it has provided in these comments more than a month ago and has not received any further communication from USAC since then. Until it receives a funding commitment, Region 10 ESC’s member districts are going to have to take service at higher rates than the competitively bid consortium rates. The addition of another 180 days for a “challenge process” would further exacerbate the significant delay that is already inherent in the review process.

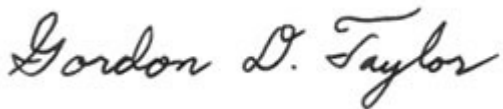
Finally, the Commission should not seek to limit the consortium approach. Eastex and Nortex assert that they sometimes “become access providers to the larger carriers who have won the regional bids, but who cannot with their own facilities reach . . . individual schools,” and that as a result “schools have paid more for their service and have lost their ability to acquire local service and support.”¹⁶ The commenters provide no citations, data or other support for these assertions, and Region 10 ESC notes that this has never been true in its experience. Region 10 ESC also asks the Commission to be skeptical of Eastex and Nortex’s description of how

¹⁶ Eastex/Nortex Comments at 5.

difficult it supposedly is for rural carriers to find out about RFPs issued by consortia in their service areas.¹⁷ As other commenters have noted, the Commission has mandated that recipients of high-cost support respond to FCC Forms 470.¹⁸ Given that carriers such as Eastex and Nortex have been required to bid since funding year 2016, it is unlikely that they have been unable to figure out how to ensure that they are complying with the E-rate rules in this regard.

In conclusion, Region 10 ESC hopes that the additional facts presented in this reply are helpful as the Commission assesses whether to initiate a rulemaking in response to the Texas Carriers' Petition. We would be more than happy to answer any questions or provide additional information. Between the inclusiveness and openness of Region 10 ESC's competitive bidding process and the enormous cost savings that resulted from the consortium approach, Region 10 ESC believes that the Texas Carriers have failed to identify a problem that requires changes to the E-rate rules.

Respectfully submitted,



Gordon Taylor
Executive Director
Region 10 Education Service Center
400 E. Spring Valley Rd.
Richardson, TX 75081-5101
(972) 348-1000
gordon.taylor@region10.org



Brent Goerner
Chief Technology Officer
Region 10 Education Service Center
400 E. Spring Valley Rd.
Richardson, TX 75081-5101
(972) 348-1170
brent.goerner@region10.org

July 16, 2019

¹⁷ Eastex/Nortex Comments at 5-6.

¹⁸ See, e.g., SECA Comments at 9-14; *Second Modernization Order* paras. 60-70.

EXHIBIT 1

Company _____

1.0 SCOPE OF SERVICES

The intention of this Request for Proposal (RFP) is to solicit proposals for Leased Lit Fiber Service and Leased Dark Fiber Service for ESC Region 10 Fiber Consortium Members. Your proposal submission must include the required specification information, pricing structure, Certification Forms, Verifications and all required RFP documents.

*****Failure to include this information will disqualify your response*****

The RFP timeline is as follows:

- Bid Release Date – January 24, 2018
- Pre-Bid Conference – February 5, 2018 – 2:30 P.M. Limit of 2 Representatives per Company for Pre-Bid Conference
- Last Day for Submittal of Vendor Questions – February 15, 2018
- ESC 10 Response to Vendor Questions – February 19, 2018
- RFP Due Date – March 15, 2018 at 2:00 P.M.
- RFP Evaluation – March 16, 2018 to March 21, 2018
- Contract effective dates: July 1, 2018 – June 30, 2028, plus up to Ten (10) One-year extensions, or as negotiated based upon RFP responses.

This contract may be awarded to a single vendor or multiple vendors as determined to provide the best value to the ESC Region 10 Consortium. ESC Region 10 Consortium reserves the right to negotiate with any or all respondents and accept or reject any and/or all proposals, to waive any formalities and/or irregularities and to award in the best interest of the Consortium. This contract will be contingent upon the receipt of a funding commitment decision letter from the Universal Service Administrative Company.

As approved by the Federal Communications Commission in E-rate modernization order 2 (WC Docket No. 13-184) (<https://www.fcc.gov/document/fcc-releases-order-modernizing-e-rate-21st-century-connectivity>) - ESC Region 10 Consortium wishes to compare Leased Lit Fiber Services and Leased Dark Fiber services for the construction of the ESC Region 10 Consortium Broadband Wide Area Network (WAN). The Primary purpose of the ESC Region 10 Consortium is to provide **Competitively Priced Broadband Connectivity and Internet Access** from consortium member district network operation center(s) to the Infomart Data Centers, 1950 N. Stemmons Freeway, Suite 1000, Dallas, TX 75207. Service Implementation is planned to begin on June 1, 2019 and continue until the installation of service at all member district endpoints have been completed.

ESC Region 10 Consortium member districts have experienced significant bandwidth demand increases in the past five years. The member district's instructional plan includes use of latency sensitive applications, upload reporting requirements and significant peaks in bandwidth demand. Throttling bandwidth and operating on a congested network for member districts has been determined to be unacceptable based on the instructional plan for the ESC Region 10 Consortium member districts.

With this in mind, the ESC Region 10 Consortium is seeking options for a dedicated broadband network solution for the provision of fiber connectivity to deliver Competitively Priced Internet Access to member districts. Based upon the continued increase in Internet Access bandwidth utilization and SETDA recommendations of at least 1 Mbps of Internet Access Bandwidth per student by 2018, ESC Region 10 Consortium is requesting broadband network solutions where all fiber and routing equipment is 100% dedicated to the ESC Region 10 Consortium Network. Any proposed fiber and routing equipment for the Dark Fiber Service must be exclusive to the ESC Region 10 Consortium

Company _____

Network. The solution options should provide high availability, high bandwidth services that support data, voice, and video simultaneously.

2.0 SPECIAL CONDITIONS

- a) Vendor(s) shall safeguard all information and data provided by ESC-10. Further, vendor(s) shall not sell or make available data or mailing lists compiled from data received from ESC-10 without the express written approval of ESC-10, through the Buyer, with appropriate remuneration to Region 10.
- b) ESC-10 will consider alternates but reserves the right to be the sole judge to determine which response offers the best value in meeting the needs of ESC-10.
- c) Services will be purchased as needs arise and funding allows.
- d) ESC-10 shall be sole interpreter of the terms, conditions, specifications and performance requirements contained herein.
- e) The transfer or assignment of contracts is prohibited.
- f) All delivery charges are to be included in respondent prices.
- g) COMPLIANCE WITH LAW: The respondent will be responsible for compliance with all applicable local, state, and federal laws.
- h) Significant changes or necessary items not covered in proposal may be added to this contract at the discretion of ESC-10.
- i) Specifications as written meet ESC-10's minimum standards as to the usage, materials, and contents for our needs and requirements. Specifications received from vendors that are different from the original requirements must meet or exceed original specifications to be considered as equivalent. ESC-10 will be the sole judge of specification equivalency.
- j) Vendor must provide an intellectual property agreement protecting both parties.
- k) This contract may be awarded to a single vendor or multiple vendors as determined to provide the best value to ESC REGION 10 Consortium. ESC REGION 10 reserves the right to negotiate with any or all respondents and accept or reject any and/or all proposals, to waive any formalities and/or irregularities and to award in the best interest of the School District.

3.0 GENERAL TERMS

- a) All contracts and agreements between vendors and Education Service Center, Region 10 shall strictly adhere to the statutes as set forth in the Uniform Commercial Code as last amended in 1990 by the American Law Institute in the National Conference of Commissioners on uniform state laws. Reference: Uniform Commercial Code, 1990 Official Text, 2/Sales.
- b) Responders are advised that ESC-10 contracts are subject to all legal requirements provided for in the Texas Senate Bill 1, Subchapter B, Section 44.031 and/or applicable state and federal statutes. Any proposal after being awarded becomes subject to the Open Records Act, Article 6252-17a VTCS.
- c) If product and/or service provided is not satisfactory to ESC-10, agreement can be terminated at any time upon a 30-day written notice.
- d) ESC-10 reserves the right to all warranties, express and implied.
- e) All parties agree that venue for any litigation arising from this contract shall lie in Richardson, Dallas County, Texas, and that the laws of the State of Texas shall govern the rights of the parties and the validity and interpretation of any purchase order, contract, or service agreement that shall arise from and include this proposal request.
- f) ESC-10 retains exclusive rights to all content and final product.
- g) Patented or copyright protected items: Vendor agrees to protect ESC-10 from recourse and all claims arising from rights under patent, copyright, trademark or application infringement.

EXHIBIT 2

CONSORTIUM WAN

Region 10 Consortium WAN Evaluation									
FY2018 E-Rate									
Date Evaluated 03/20/2018									
20 Year Evaluation									
Evaluation Criteria									
All 10 Gbps									
Zayo Zayo Zayo Zayo UPN UPN Netsync Spectrum									
WAN Fiber Network									
Bid Type									
Table 1 Leased Lit Fiber - Vendor Recommended Solution Table 1 Leased Lit Fiber -STD Table 2 Leased Dark Fiber - STD Table 2 Leased Dark Fiber - Vendor Recommended Table 2 Leased Dark Fiber Table 1 Leased Lit Fiber Table 1 Leased Lit Fiber Table 1 Leased Lit Fiber									
Vendor Notes									
Vendor deleted four rural locations.									
Bid 36 of 87 Sites Average MRC Per Circuit was used for Evaluation Purposes.									
Monthly Recurring Charge									
MRC									
\$ 26,571.85 \$ 27,766.22 \$ 14,903.70 \$ 14,262.30 \$ 73,920.00 \$ 73,920.00 \$ 212,598.75 \$ 59,721.80									
Total MRC over 20 Years									
MRC - 20									
\$ 6,377,244.00 \$ 6,663,892.80 \$ 3,576,888.00 \$ 3,422,952.00 \$ 17,740,800.00 \$ 17,740,800.00 \$ 51,023,700.00									
Non-Recurring Charge									
NRC									
\$ - \$ 6,501,461.00									
Special Construction Charge									
SCC									
\$ 20,565,891.97 \$ 24,100,298.12 \$ 24,100,297.83 \$ 20,565,891.97 \$ 36,000,000.00 \$ 36,000,000.00 \$ 39,421,867.80 \$ -									
Network Equipment Cost - Dark Fiber									
Eqpt Cost									
\$ 5,300,058.81 \$ 5,260,058.81 \$ 5,300,058.81									
Total 20 Year Cost									
\$ 26,943,135.97 \$ 30,764,190.92 \$ 32,977,244.64 \$ 29,248,902.78 \$ 59,040,858.81 \$ 60,242,261.00 \$ 90,445,567.80 \$ -									
Quantity of Circuits									
20 Year Cost per Circuit (87)									
\$ 309,691.22 \$ 353,611.39 \$ 379,048.79 \$ 352,396.42 \$ 678,630.56 \$ 692,439.78 \$ 1,039,604.23 \$ -									
Average Cost Per Circuit									
Monthly Cost per Circuit									
\$ 1,290.38 \$ 1,473.38 \$ 1,579.37 \$ 1,468.32 \$ 2,827.63 \$ 2,885.17 \$ 4,331.68 \$ 1,658.94									
Maximum Points									
Purchase price									
30 30.00 26.27 24.51 27.64 13.69 13.42 8.94 27.00									
Reputation of the vendor and vendor's goods or services									
12 12 12 12 12 10 10 9 11									
Quality of the vendor's goods or services									
10 10 10 10 10 8 8 7 9									
Extent to which the goods or services meet the district's needs									
10 0 10 10 0 9 9 8 0									
Vendor's past relationship with the district									
10 10 10 10 10 7 7 7 10									
Impact of district's compliance with laws and rules relating to Historically Underutilized Businesses									
1 1 1 1 1 1 1 1 1									
Total long-term cost to the district									
12 12.00 10.51 9.80 11.05 5.48 5.37 3.57 10.56									
Other relevant factors specifically listed in this CSP									
Service Level Agreement									
5 5 5 5 5 4 4 4 3									
Proposed Implementation Plan									
5 5 5 5 5 4 4 3 2									
Local Service & Support Team									
5 5 5 5 5 4 4 3 4									
Total Maximum Points									
100 90.00 94.78 92.31 86.69 66.17 65.78 54.51 77.56									

Internet Access

Region 10 Consortium Internet Access Evaluation						
FY2018 E-Rate						
Date Evaluated 03/20/2018		36 Months Evaluation				
Evaluation Criteria		2 100 Gbps Ports	Cogent	Zayo	Spectrum	Consolidated
Internet Access Service Port Only		Bid Type				
		MRC	\$ 20,500.00	\$ 30,500.00	\$ 130,000.00	\$ 134,234.00
Non-Recurring Charge		NRC	\$ -		\$ -	\$ -
		Total 3 Year Cost	\$ 738,000.00	\$ 1,098,000.00	\$ 4,680,000.00	\$ 4,832,424.00
		Maximum Points				
Purchase price		30	30.00	20.16	4.73	4.58
Reputation of the vendor and vendor's goods or services		12	9	12	11	10
Quality of the vendor's goods or services		10	7	10	9	8
Extent to which the goods or services meet the needs of ESC R10		10	6	10	4	8
Vendor's past relationship with ESC Region 10		10	7	10	10	5
Impact of district's compliance with laws and rules relating to Historically Underutilized Businesses		1	1	1	1	1
Total long-term cost to ESC Region 10 to acquire the Vendor's goods or services.		13	13.00	8.74	2.05	1.99
Other relevant factors specifically listed in this CSP						
Service Level Agreement		5	4	5	3	2
Proposed Implementation Plan		4	3	4	2	1
Local Service & Support Team		5	3	5	4	2
Total Maximum Points :		100	83.00	85.90	50.78	43.57
Evaluator:		Summary Notes				
Name -						
Title -						
Signature -						
Date -						

EXHIBIT 3

SIGN-IN SHEET
RFP #2018-08 Internet Access Services
RFP #2018-07 Leased Lit and Dark Fiber Services
Monday, February 5, 2018

NAME	COMPANY (Please attach business card)	RFP of Interest	EMAIL
DAN COLLINS	CROWN CASTLE FIBER	DIA	DANIEL.COLLINS@CROWNCASTLE.COM
Amie Cherry	Crown Castle Fiber	DIA	amie.Cherry@CrownCastle.com
Randy Wright	Unite Private Networks	WAN	randy.wright@upnfiber.com
PETE NELSEN	ZAYO FIBER SOLUTIONS	IP/WAN	PETE.NELSEN@ZAYO.COM
Dawn Deaver	Zayo Global	IP/WAN	ddeaver@onetelgen.com
Rich Sharpley	Unite Private Networks	WAN	Rich.Sharpley@upnfiber.com
Russell Neal	VST SERVICES, LP	All	RNEAL@VSTSERVICES.COM
Brent Goerner	Region 10		brent@region10.org