



August 14, 2020

RE: WC Docket No. 13-184

Initial Comments of AdTec, Inc in Response to  
DA 20-767 Seeking Comments on the Draft Eligible Services List for Funding Year 2021

The Draft Eligible Services List (ESL) for FY 2021 includes internal connections, defined as equipment/services “necessary to bring broadband into, and provide it throughout, schools and libraries”. This is detailed in a bullet list of Eligible Broadband Internal Connections that includes cabling, routers, and switches. These items have been eligible for reimbursement under the E-Rate program since the program began, but recent questions posed during application reviews and audits have led to funding denials for some or part of funding request for these items. On July 17, 2020 the State E-Rate Coordinators’ Alliance (SECA) filed an *ex parte* letter highlighting this issue and detailing the rationale for the full eligibility of this equipment. We fully support SECA’s logic and their conclusion that the FCC needs to issue some form of documentation to clarify the eligibility of this equipment and that the FY 2021 ESL is the perfect place for this clarification.

We thank the Commission for their guidance and support for the E-Rate program and look forward to the resolution of this uncertainty.

Sincerely,

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