

September 24, 2021

VIA ELECTRONIC FILING

**Re: Comments of ApplianSys on the proposed eligible services list for the e-rate program -- WC
Docket No. 13-184**

ApplianSys has provided detailed evidence to the Wireline Competition Bureau in 2017, 2018 and 2019 to report on the impact of caching deployments in school districts and to project the value that increased caching adoption will deliver for the Universal Service Fund. Our caching appliance has been the most widely selected caching solution in the E-Rate program since 2015.

As part of this ongoing participation in the E-rate process, we hereby submit the following comment in response to the Eligible Services List, published for comment on 27 August 2021.

Previous Eligible Services Lists have carried the following reminder: "We remind applicants that servers are ineligible except when necessary for the provision of caching. Accordingly, applicants requesting E-Rate funding for servers must indicate that this equipment is necessary for the provision of caching on their FCC Form 471." In the Eligible Services List proposal for 2022, the statement is no longer included.

The reminder in Eligible Services List was a helpful clarification of the only circumstances in which a server can be request and this statement should be reinstated.

Each year ApplianSys sees Form 471s requesting server equipment without stating the caching solution that the applicant intends to use. Often, the only information provided is the hardware that requesters wish to purchase – without accompanying software, a server is not a caching solution.



To ensure that waste is avoided, further clarification should be provided in the ESL to remind caching applicants that form 470s must provide a description of their caching requirement which is not simply an encyclopaedic description of caching. It is only with clarity on the specific requirements and the chosen caching solution can a determination be made as to whether the best value solution has been selected when applicants file 471s.

Respectfully submitted,

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