

**Before the**

**FEDERAL COMMUNICATIONS COMMISSION**

**Washington, D.C. 20554**

**In the Matter of:**

The FY2022 Eligible Services List

WC-13-184

**REPLY COMMENTS OF  
E-RATE PROVIDER SERVICES**

## COMMENTS

E-Rate Provider Services respectfully submits reply comments on the FY2022 Eligible Services List.

E-Rate Provider Services is a consulting firm serving Service Providers in the E-Rate program. E-Rate Provider Services' purpose is to assist E-Rate Service Providers in navigating the complexities of the program, providing sales and compliance assistance, cost allocation services, bid and proposal review, and staff training.

## SCHOOL BUS WIFI

After a thorough reading of the initial comments, E-Rate Provider Services agrees wholeheartedly with the commenters urging an expansion of the ESL to include WiFi on school buses (Kajeet, SHLB, and CoSN). It expands the learning day for students, and provides connectivity to students with no internet access at home. In summary form, it is a low-cost solution to a number of challenges, and within the purview of the Commission to enact.

## ADVANCED FIREWALL SERVICES

The issue of expanding the ESL to include advanced firewall services is not as clear. E-Rate Provider Services urges a cautious, incremental approach, and submits that dividing security issues into "Issues that can Prevent Learning" and "Issues that are Concerning but Will Not Prevent Learning" provides a useful bifurcation.

The first category of security issues includes DDOS, Malware, Ransomware, Viruses, and outright intrusion. The second category includes SPAM and potentially disturbing or invasive content. In short, E-Rate Provider Services believes that DDOS prevention, Anti-Virus Services, Intrusion Detection (IDS), and Intrusion Prevention (IPS) should be added to the ESL as specific services, but that content filtering and SPAM filtering should not. E-Rate Provider Services believes that adding specific features is a more prudent approach that will allow the Commission to gauge the impact of the changes more effectively.

## SERVICE CATEGORIZATION

E-Rate Provider Services agrees with E-Rate Expertise that yearly licenses should be reimbursed in one lump sum, payable at the beginning of the funding year. The applicant has to pay them at once; they should also be reimbursed at once.

E-Rate Provider Services also believes that the entire system of sub-categorization needs to be overhauled. Simply put, E-Rate Provider Services believes that Category 2 subcategories (Internal Connections, BMIC and MIBS) should be eliminated, and replaced with the much more simple and flexible “Category 2 – Recurring” and “Category 2 – Non-Recurring.”

Failure to check a sub-category box on the Form 470 is, in this author’s opinion, the single biggest “gotcha” plaguing the program. Often, applicants don’t know what specific services they want, or even what’s available. They check “C2 – Internal Connections” and forget to check the “C2 – Basic Maintenance” box, which forever bars them from seeking maintenance services based on that Form 470. Or, alternately, they request maintenance, and a service provider submits a proposal

for MIBS, but because they did not select “C2- MIBS” on the Form 470, they cannot submit a Form 471 based upon that Form 470.

E-Rate Provider Services understands that this is a holdover from the 3<sup>rd</sup> Report and Order which established Basic Maintenance as a separate category of service, but it did that in order to effect the “2 in 5 Rule,” which was eliminated when the Commission established the C2 budget. Having BMIC and MIBS as separate categories prevents reviewers from making simple changes during the review process. Changing from “C2 – Recurring” to “C2 – Non-Recurring” could be done during PIA. This would accomplish what the Commission really wants in this matter, which is, establishing service delivery dates and the ability to grant service delivery extensions: recurring services have a 12-month window and are not extendable, while non-recurring services have an 18- or 21- month window, and can be extended based on exigent circumstances.

## SUMMARY POINTS

1. E-Rate Provider Services supports the expansion of the FY 2022 ESL to include WiFi on school buses;
2. E-Rate Provider Services supports the incremental expansion of FY 2022 ESL to include specific, advanced security offerings: DDOS Mitigation, IPS/IDS, and Anti-Virus services.
3. E-Rate Provider Services supports the eliminating sub-categories of C2 services, and replacing them with a simpler and more flexible “C2 – Recurring” and “C2 – Non-Recurring”.
4. E-Rate Provider Services supports allowing applicants to recoup license costs in the full amount, and in the beginning of the license term.

Respectfully submitted:



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