



September 21, 2022

Federal Communications Commission
Wireline Competition Bureau (ECFS: <https://www.fcc.gov/ecfs/>)
45 L Street, NE
Washington, DC 20554

RE: Comments in response to WIRELINE COMPETITION BUREAU'S
August 22, 2022, REQUEST FOR COMMENTS ON PROPOSED
ELIGIBLE SERVICES LIST FOR THE E-RATE PROGRAM
WC Docket No. 13-184; DA 22-878

To Whom It May Concern:

Extreme Networks, Inc. ("Extreme") respectfully submits these comments and requests clarification regarding WC Docket No. 13-184; DA-22-878, Proposed Eligible Services List for the E-Rate Program. Specifically, Extreme seeks confirmation from the Wireline Competition Bureau that Artificial Intelligence for IT Operations ("AIOps") software applications such as Extreme Networks ExtremeCloud™ IQ CoPilot, and the currently E-Rate eligible Juniper Networks Virtual Network Assistant ("VNA") Marvis are E-Rate eligible.

These AIOps applications enable E-Rate customers to leverage the full functionality of their E-Rate eligible hardware ensuring continuous connectivity to broadband connections used for educational purposes. In Extreme's instance, our AIOps, including ExtremeCloud IQ CoPilot, is cloud-based software supporting the E-Rate eligible components that are relied upon to distribute high-speed broadband throughout school buildings and libraries. These software applications enable customers to optimize the full functionality of their E-Rate eligible hardware by providing constant attention to maintain the operation of the devices and ensure uninterrupted services. In so doing, our software applications facilitate the full functionality of the eligible components by allowing customers to dynamically baseline the network services, improve time to resolution of any identified issues, and eliminate network outages before they impact the educational experience. Without Extreme's AIOps software applications K-12 and Library IT Departments would not be using an optimized deployment of their Extreme E-Rate eligible equipment, and would require significant time and resources to diagnose issues and ensure continuous services.

For these reasons, we respectfully request clarification and confirmation that Extreme's AIOps software applications, much like the currently E-Rate eligible Juniper Networks



Virtual Network Assistant (“VNA”) Marvis, are E-Rate eligible and available. We believe that such clarification will provide certainty and efficiency as we work with our customers to provide them our best-in-class E-Rate eligible solutions.

Thank you,

David Savage

David Savage
Vice President
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Telecommunications Access Policy Division
Wireline Competition Bureau