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

In the Matter of	)	
	)	WC Docket No. 13-184
Schools and Libraries Universal Service	)	CC Docket No. 02-6
Support Mechanism	)	
	)	

COMMENTS OF ARUBA, A HEWLETT PACKARD ENTERPRISE COMPANY
on the
DRAFT ELIGIBLE SERVICES LIST FOR SCHOOLS AND LIBRARIES
UNIVERSAL SERVICE PROGRAM FOR FUNDING YEAR 2017

Aruba, a Hewlett Packard Enterprise company, applauds the efforts of the Federal Communications Commission to continue to improve the E-rate program, and appreciates the opportunity to file comments in response to the 2017 draft Eligible Services List (ESL). The success of the FCC's E-rate Modernization Order has been outstanding. Since the Order took effect in FY2015, the program has been able to fund all timely and eligible funding requests, not only for Category 1 services, but also for Category 2 services, which have been historically under-funded. Due to the steps taken by the FCC, the E-rate program has committed more than $3.3 billion, including $1.3 billion for Category 2 services, to schools and libraries to meet the goals of the Modernization Order and close the Wi-Fi gap, and had a carry-over of $1.9 billion for FY2016 (DA 16-629). Based on the USAC demand estimate for FY2016, the funding available for FY2017 will likely be near $6 billion.

In the E-rate Modernization Order, the FCC stated that it would leave the record open on network security and other services to allow for further comment as it evaluates the changes in the first funding year (para. 121). Given the success of the FCC's modernization efforts and the funding that remains available, we request the FCC to expand the FY2017 Eligible Services List to include services that are essential to enable safe and secure high-speed broadband connectivity in schools and libraries.

Policy Management Systems

In 2013, President Obama stated during a speech: "In a country where we expect free Wi-Fi with our coffee, we should definitely demand it in our schools." This speech prompted the release of the original FCC E-Rate Modernization NPRM (WC Docket No. 13-184). In order to achieve the same "coffee-shop" experience, a policy management system that can provide safe and secure Wi-Fi access is critical.

Policy Management Systems are necessary to ensure that schools and libraries can offer students safe and secure Wi-Fi access. Policy Management Systems provide role-based policy management

for users and devices (IT-managed and BYOD). They include enterprise-grade AAA, including RADIUS/TACACS+, 802.1X and non-802.1X services. Having a policy management system enabled will ensure that only devices that meet the security requirements of the school will be allowed onto the E-rate supported Wi-Fi network and granted appropriate access privileges, regardless of access method or device ownership, thus further protecting the eligible use of E-rate supported network resources. Securing the Wi-Fi access will also help to mitigate the unauthorized use of the Wi-Fi infrastructure, including E-rate supported high-speed internet connections, possibly reducing the demand for unnecessarily higher bandwidth.

Self-Provisioned Network Management

As recognized in the E-rate Modernization Order, Network Management is essential to ensure the continuous operation of school and library networks. The program currently allows Network Management as part of a Managed Internal Broadband Services contract, and encourages applicants to "compare the cost-effectiveness of bids for self-provisioned networks with those for managed Wi-Fi contracts." (Para. 127). However, under the FY2017 Draft Eligible Services List, Network Management is eligible only when it is provided by a third party, not when it is self-provisioned. In order to ensure that applicants can do a cost-effectiveness comparison and select solutions that fit their needs, we urge the FCC to provide Category 2 E-rate support for both third-party Network Management and applicant purchases of hardware and software components that perform the same functions.

Adopting these modest changes to the ESL will help the Commission fulfill its goal of providing schools and libraries with modern tools of education in a cost-efficient and future-proof manner.

Respectfully submitted by:

Aruba, a Hewlett Packard Enterprise company

_____

Dan Rivera
Aruba, a Hewlett Packard Enterprise company
1344 Crossman Avenue
Sunnyvale, CA 94089
(650) 258-0748
danrivera@hpe.com

July 5, 2016