

**Before The  
Federal Communications Commission  
Washington, D.C. 20554**

In The Matter Of )  
Modernizing the E-Rate Program ) WC Docket No. 13-184  
For Schools and Libraries )

**Comments of AdTec, Inc. on the  
Proposed Eligible Services List for the E-Rate Program FY 2018.21 (DA 17-602)**

FCC Public Notice DA 17-602 requests comments on the Draft Eligible Services List (ESL) for Funding Year (FY) 2018. AdTec, Inc would like to address the second bullet point in the initial commentary seeking comment “on the category of service that should apply to inside wiring between different schools or libraries sharing a single building.” The current ESL defines connections between different schools or libraries as Category One services. This requires applicants that need new cabling in a building that houses, for instance, both a middle school and a high school to competitively bid the cables that cross between the spaces designated for each school against leased services. A situation that is often, as DA 17-602 puts it, impractical. The FCC granted a waiver for FY 2017 only to allow applicants to *elect* (emphasis added) to seek bids for these connections as Category Two services. This requires applicants to divide the costs for the work between the areas designated for each school so that they can be applied appropriately against each building’s C2 budget. Another situation that is often impractical. Given that this type of work is difficult to shoehorn into the Category One and Category Two definitions we respectfully request that the FCC continue to allow applicants to elect to apply for their funding under either Category. Adtec, Inc. continues to encourage the FCC to allow decisions at the local level to serve the best interest of the applicant when requesting E-Rate funding. Local decision-makers know their needs best and should be allowed by the FCC to make the most appropriate E-Rate decision based on local needs.

Respectfully submitted,

Charles F. Hobbs, PhD  
President, AdTec, Inc  
charlie@adtecerate.com

Darsey A. Carnal  
Government Relations/Program Compliance Officer, AdTec, Inc  
darsey@adtecerate.com