

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

In the Matter of)	
)	WC Docket No. 13-184
Schools and Libraries Universal Service)	
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 2019

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 2019 draft Eligible Services List (ESL). The results of the FCC’s E-Rate Modernization Order have been noticeable. Since the Order took effect in FY2015, the program has funded all timely and eligible funding requests, not only for Category 1 services, but also for Category 2 services, which have been historically under-funded. Over the last 4 funding years, the E-Rate program has committed more than \$10 billion, including \$3.1 billion for Category 2 services, and is continuing to issue Funding Commitment Decision Letters. With the modifications made in the E-Rate Modernization Order, not only is there enough funding within the funding cap to fund all eligible requests, there is an abundance of funding available for roll-over from previous years. On August 17th, 2018 the Wireline Competition Bureau directed USAC to fully fund all category one and category two funding requests, due in part to \$1.2 billion in E-Rate funds unused from previous years available for use in E-Rate funding year 2018.¹

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 results of the FCC’s modernization efforts and the funding that remains available, we again request the FCC to expand the FY2019 Eligible Services List to include services that are essential to enable safe and secure high-speed broadband connectivity in schools and libraries. School districts around the country are increasingly becoming the targets of cyberattacks against government infrastructure, as indicated by warnings from the U.S. Department of Education² and the Federal Bureau of Investigation.³ According to the 2018

¹ See Public Notice DA 18-861 (released 8/17/2018) <https://docs.fcc.gov/public/attachments/DA-18-861A1.pdf>

² See “ALERT! – CyberAdvisory – New Tupe of Cyber Extortion/Threat notice (posted 10/16/2017) <https://ifap.ed.gov/eannouncements/101617ALERTCyberAdvisoryNewTypeCyberExtortionThreat.html>

³ See Private Industry Notification from FBI, Cyber Division (posted 01/31/18) <https://info.publicintelligence.net/FBI-CyberCriminalsSchools.pdf>

National Survey of Applicants by Funds For Learning, 96% of all respondents chose Network Security when asked which service they wanted to see added to the ESL.⁴

Policy Management Systems

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, 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 FY2019 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. Allowing the applicants to compare costs of third party versus self-provisioned network management and select the best price option will help save the program money.

Multi-year Basic Maintenance of Internal Connections

Multi-year basic maintenance of internal connections (“BMIC”) contracts have several benefits, including that they often have a price advantage over single year support. By providing support for multi-year BMIC contracts, eligible in full during the first funding year, the applicant and the program will experience many benefits: cost savings, application simplification, extended use of equipment, and predictability. The allowance of a multi-year BMIC contract would be similar to the same allowance already established by USAC in regards to multi-year licenses of eligible

⁴ See 2019 E-rate Update Webinar – 2018 National Survey of Applicants Results: What would you like to see added to ESL? (slide 15)

https://www.brighttalk.com/webcast/13679/331132?utm_source=EratePage&utm_medium=brighttalk&utm_campaign=331132

software under Category Two Internal Connections⁵. This modification to the 2019 Eligible Services List will not increase demand, as each applicant is still subject to the Category Two Maximum Budget. Rather, by taking advantage of the reduced cost of multiyear BMIC contracts, the program will save money. Not only will the program save money, it will also reduce the number of annual applications. This will free up USAC to focus on meeting the FCC's goal of issuing all workable applications by September 30 of each funding year as applicants will only need to file a single application for the multiple years covered. Also, by ensuring proper maintenance of the eligible equipment, the life of the equipment will be extended, making better use of the E-Rate funds.

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 forward-looking manner.

Respectfully submitted by:

Aruba, a Hewlett Packard Enterprise company



Dan Rivera
Aruba, a Hewlett Packard Enterprise company
3333 Scott Blvd
Santa Clara, CA 95054
(650) 258-0748
danrivera@hpe.com

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⁵ See Update on Eligibility of Multi-year Licenses <https://www.usac.org/sl/tools/news-briefs/preview.aspx?id=603>