

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

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

**REPLY COMMENTS OF ARUBA, A HEWLETT PACKARD ENTERPRISE
COMPANY, ON THE DRAFT ELIGIBLE SERVICES LIST FOR SCHOOLS AND
LIBRARIES UNIVERSAL SERVICE PROGRAM FOR FUNDING YEAR 2021**

For many years, Aruba, a Hewlett Packard Enterprise company and a leading Wi-Fi and networking equipment manufacturer, has advocated for E-rate funding for advanced network security services, demonstrating that those services are essential to ensure safe and secure high-speed broadband connectivity in schools and libraries.¹

We strongly support the comments filed by Funds For Learning (FFL), the State E-rate Coordinators' Alliance (SECA), and others to the Draft FY 2021 Eligible Services List, asking the Commission to specify that advanced network security features are eligible as part of Category Two firewall service or equipment.² As FFL has stated: "Today, broadband networks

¹ See, e.g., *Ex parte notice* (Oct. 18, 2019), <https://ecfsapi.fcc.gov/file/101860669045/2019-10-18%20HPE%20Ex%20Parte.pdf>; *Ex parte notice* (Sept. 24, 2019), <https://ecfsapi.fcc.gov/file/10924260020672/2019-09-24%20HPE%20Ex%20Parte.pdf> (noting broad stakeholder consensus on need to fund modern network security and specifying what network security includes); *Ex parte notice* (Sept. 6, 2019); *Aruba Comments on Proposed Rulemaking on Category Two Budgets* (Aug. 16, 2019), <https://ecfsapi.fcc.gov/file/10816211568194/E-rate%20NPRM%20C2%20Comments.pdf>; *Aruba Comments to Draft 2017 Eligible Services List*, <https://ecfsapi.fcc.gov/file/1070668707247/2016-07-05%20FCC%20Draft%20ESL%20FY2017%20Comment.pdf>.

² *Comments of FFL* (Aug. 14, 2020), <https://www.fundsforlearning.com/docs/2020/08/Comments%20of%20Funds%20For%20Learning%20on%20Proposed%20Eligible%20Services%20List.pdf>; *Comments of SECA* (Aug. 20, 2020), <https://ecfsapi.fcc.gov/file/1082089994631/SECA%20ESL%20Comments%20FY%202021%20filed.pdf>; *Comments of Fortinet* (Aug. 20, 2020), <https://ecfsapi.fcc.gov/file/10820092971818/COMMENTS%20Fortinet.pdf>.

cannot function without security, monitoring, and related services. We are not asking the WCB create a new class of eligible services to include network security and monitoring services and equipment. Instead, we suggest that it fits into the existing eligible services framework because it is necessary to provide broadband access to students, patrons, and their communities. The Commission has acknowledged the importance of permitting applicants to allocate their Category Two budgets how they see fit. For the same reasons, we support giving schools and libraries the option and flexibility to spend their Category Two budgets on what network infrastructure they believe to be most essential to building and maintaining their networks, including security and network monitoring services.”³

We further support the petition filed by Cisco on August 20, 2020, asking the Commission to “exercise its waiver authority to allow schools to use E-rate Category 2 funding to cover the costs of network security software in the 2020 and 2021 funding years,” due to the new exigencies of COVID-related distance learning.⁴

Respectfully submitted by:
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³ *Comments of FFL* (Aug. 14, 2020), <https://www.fundsforlearning.com/docs/2020/08/Comments%20of%20Funds%20For%20Learning%20on%20Proposed%20Eligible%20Services%20List.pdf>.

⁴ *Petition of Cisco* (Aug. 20, 2020), <https://ecfsapi.fcc.gov/file/10820400607480/Cisco%20Security%20Waiver%20Petition%20082020.pdf>.