

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

In the Matter of WC Docket No. 13-184
Modernizing the E-rate Program for Schools and Libraries

Reply comments of ApplianSys on the proposed Eligible Services List

Commentary on this year's Eligible Services List is somewhat complicated by the timing of The Notice of Proposed Rule Making on Category Two¹. This Notice has generated many suggestions which, if enacted, may lead to substantive changes to the services that are made eligible in 2019/20 cycle.

Many commenters have recommended that FCC make eligible additional network equipment. ApplianSys supports many of these recommendations but suggests that care is taken to avoid waste and to maximize use of funds, in line with Goal 2 of the 2014 Modernization Order:

"Goal 2: Maximizing the Cost-Effectiveness of E-rate Spending (Order 50-54)

*The FCC adopts as its second goal maximizing the cost-effectiveness of spending for E-rate supported purchases, thereby minimizing the contribution burden on consumers and businesses and maximizing the benefit of each dollar spent on services for schools and libraries."*²

New Mexico State Department of Education³, State of South Carolina⁴, Education Super Highway⁵, Kentucky State Department of Education⁶, Schools Health & Libraries Broadband Coalition⁷, State E-rate Co-ordinators Alliance, Funds For Learning⁸ and State E-rate Coordinators Team – Florida⁹ recommended adding support for Content Filtering.

ApplianSys supports the inclusion of Content Filtering in the Eligible Services List. In addition to protecting students from inappropriate content, filtering can contribute to effective use of bandwidth by avoiding wasteful use of capacity on non-educational traffic.

Education Super Highway, New Mexico State Department of Education, Kentucky State Department of Education¹⁰, State of South Carolina, Funds For Learning and State E-rate Coordinators Team – Florida recommend adding support for Network Security solutions.

¹ See Wireline Competition Bureau Notice Proceeding: 13-184, Filing [0802706006732](#), August 2019

² See 'Summary of the E-Rate Modernization Order', FCC, December 2014, <https://www.fcc.gov/general/summary-e-rate-modernization-order>

³ See comments of New Mexico Dept. of Education, proceeding: 13-184, filing: [10816038403294](#), August 2019

⁴ See comments of The State of South Carolina, proceeding: 13-184, filing: [10816379103124](#), August 2019

⁵ See comments of EducationSuperHighway, proceeding 13-184, filing [10816989913595](#), August 2019

⁶ See comments of Kentucky Dept of Education, proceeding 13-184, filing [108162358319336](#), August 2019

⁷ See comments of State E-rate Co-ordinators Alliance, proceeding 13-184, filing [10816253278092](#), August 2019

⁸ See comments of Funds for Learning, proceeding 13-184, filing <https://www.fcc.gov/ecfs/filing/10817410113153>, August 2019

⁹ See comments of Kentucky Dept. Of Education, proceeding 13-184, filing [108162358319336](#), August 2019

¹⁰ See comments of State E-rate Co-ordinator Team - Florida, proceeding: 13-184, filing <https://www.fcc.gov/ecfs/filing/10822757311292>

ApplianSys supports this suggestion but recommends that very clear guidance is provided in the final Eligible Service List to ensure that schools get best value for both their financial contributions and for Category Two budgets.

Many network solutions, particularly at the network gateway include a security element. The level of security this provides can be overstated or misunderstood.

Education Super Highway, New Mexico State Department of Education, Kentucky State Department of Education, State of South Carolina, Funds For Learning and State E-rate Coordinators Team – Florida recommended adding support for Network Monitoring.

ApplianSys supports this. In many cases, schools and districts are unable to provide ApplianSys with the basic network information that is required to propose appropriately scaled solutions and to design CACHEBOX deployments.

Thorough network information enables schools to be clear about where they have genuine network challenges in order to direct network technology investment for best value and to plan for their future needs. Given the high demand for eligibility of additional network solutions, it's clear that schools need this clarity to maximize the impact of their own budgets and FCC Category 2 support.

The State of South Carolina recommends adding support for loosely defined servers and Funds For Learning suggest that *"no network infrastructure should be ineligible."*

ApplianSys does not support these recommendations as each is open to confusion and misinformation. ApplianSys has encountered many cases of schools purchasing large servers under the caching category with no indication of intended caching software or that hardware has been carefully matched to the caching requirement.

Should the FCC elect to make Security, Filtering and Network Management eligible for funding, then also adding servers or 'any network infrastructure' would place increased pressure on already stretched Category Two budgets. It could stretch Category Two budgets even if they are increased as a result of decisions made following comments on the Notice of Proposed Rulemaking.

Opening the E-rate scheme to general purpose servers or 'any network infrastructure' will inevitably lead to waste as it will not be possible to ensure a fair competitive bidding process when services compete for category two budget. By clearly defining the services in the Eligible Services List, pricing transparency can lead schools and libraries to find the best prices for services.

"Increasing Pricing Transparency (Order 158-167)

The Order adopts rules to increase pricing transparency to help schools and libraries find the best prices for E-rate services."

If, for example, data backup services are required, these should be made available specifically, with appropriate guidance in the Eligible Services List to support best value and a fair competitive bidding process.

ApplianSys appreciates the opportunity to submit reply comments and to discuss its observations on E-rate eligible services with the Commission.

Respectfully submitted,

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