

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

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

COMMENTS OF ARUBA, A HEWLETT PACKARD ENTERPRISE COMPANY,
ON PUBLIC NOTICE DA 19-986, IMPROVING FCC FORM 470 DROP-DOWN MENU

Aruba, a Hewlett Packard Enterprise company and a leading Wi-Fi and networking equipment manufacturer, supports the Federal Communications Commission's efforts to continue to improve the E-rate program, simplify the process and alleviate any confusion that exists with the Form 470 drop-down menus. Aruba agrees with the FCC that the "drop-down menu choices should ensure that applicants can easily comply with the Commission's competitive bidding rules."¹

We appreciate the leadership that both Funds For Learning and the State E-rate Coordinators' Alliance (SECA) have taken on this important issue for stakeholders.² We support the thoughtful comments made by SECA and its approach to making positive changes to the Form 470 drop-down menu system. As SECA eloquently stated: "Applicants who make a good faith effort to comply with program rules should not be penalized because they forgot to check a box that they did not understand was required or in instances where they did not complete the form correctly because the instructions were unclear."³

Aruba also agrees with SECA that confusion still exists with respect to the Category Two drop-down menu regarding Category Two licenses. USAC released a news brief on March 15, 2019, highlighting why clarification is needed: "Licenses can vary greatly in terms of what they

¹ *Public Notice DA-986*,
<https://www.fundsforlearning.com/docs/2019/10/FCC%20Seeks%20Comment%20On%20Bidding%20Form.pdf>.

² *See Ex Parte Notice*, Funds for Learning, (May 6, 2019),
(<https://www.fundsforlearning.com/docs/2019/10/Form470DropDown-FY2019FilingWindow-ExParte2019-05-06.pdf>); *Ex Parte Notice*, SECA (Apr. 2, 2019),
<https://www.fundsforlearning.com/docs/2019/10/Form%20470%20Drop%20Down%20Ex%20Parte%20FY%202019%20.pdf>.

³ *Initial Comments of the State E-rate Coordinators' Alliance*, p.2 (Oct. 31, 2019),
<https://www.fundsforlearning.com/docs/2019/11/SECA%20Initial%20Comments%20Form%20470.pdf>.

cover and how they are used. Licenses can be either Internal Connections or Basic Maintenance of Internal Connections, depending on their function.”⁴ SECA elaborated in its comments that applicants have been denied funding when they filed a Form 470 requesting internal connections products with the licenses necessary to operate the products but USAC later determined they had not checked the correct box. Aruba agrees with SECA that the Form 470 drop-down menu should be redesigned to resolve this issue.⁵

Respectfully submitted by:
Aruba, a Hewlett Packard Enterprise company

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⁴ *USAC Schools and Libraries Program News Brief*, p.3 (Mar. 15, 2019)
(https://www.usac.org/wp-content/uploads/e-rate/documents/SL_News_Brief/3_15_2019-News-Brief-Schools-Libraries-USAC.pdf).

⁵ *Initial Comments of the State E-rate Coordinators' Alliance*, p.4 (Oct. 31, 2019),
<https://www.fundsforlearning.com/docs/2019/11/SECA%20Initial%20Comments%20Form%20470.pdf>.