



Mississippi Department of Education

Richard L. Thompson, State Superintendent of Education

Office of Management Information Systems • Nathan Slater
Director • 601-359-3487 • Fax: 601-359-2027

7/11/00

April 18, 2000

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CC: 96-45

Letter of Appeal
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Billed Entry Number: 128642
471 Application Number: 141148
Funding Request Numbers: 224795, 224797, & 224800

To Whom It May Concern:

The Mississippi Department of Education has the responsibility for providing internet access to all K-12 public school districts consisting of 1006 schools. On our form 471 application for year 2 we applied for routers that interface our statewide network to the internet. The operational software and the integrated CSU/DSUs for the routers were denied for reimbursement.

Each of these items are deemed eligible under FCC Docket # 96-45 as described below:

- Page 24 – Routers** **Eligible? Yes**
Routers are switching devices that can act as an interface between two networks and connect different segments such as departments, or floors in a building. Functionally, routers select the routing path for traffic, may provide network management capabilities, such as load balancing and provide trouble shooting diagnostic capabilities.
- Page 26 – Software** **Eligible? Conditional**
Software is only eligible if provided as a component of an eligible Internal Connection. Software for workstations is not eligible for discount.
- Operational Software** **Eligible? Yes**
Software required for server operations.
- Page 14 – Channel Service Unit (CSU) Data Service Unit (DSU)** **Eligible? Yes**
A device to terminate a digital channel at a customer premises. It performs certain line coding, line conditioning and equalization functions, and responds to loop back commands sent from the telephone company central office. A CSU sits between the digital line entering the customer premises from the central office and devices such as channel banks or data communications devices.

The Mississippi Department of Education is requesting approval for our full discount on the above eligible items according to guidelines of the program. If this request is not approved then an undue hardship will be placed upon Mississippi schools which rely on MDE for internet connections.

Our contact person for this appeal is Patricia Dalton, 359 North West Street, Jackson, MS 39201. Telephone: 601-359-3510, Fax: 601-359-3750, E-mail: pdalton@mde.k12.ms.us

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Slater", with a large, stylized flourish at the end.

Nathan Slater

FUNDING COMMITMENT REPORT FOR APPLICATION NUMBER: 0000141148

Funding Request Number: 0000224795 Funding Status: Funded
SPIN: 143005385 Service Provider Name: GE Capital IT Solutions North America, Inc.
Provider Contract Number: 30003000-8
Services Ordered: Internal Connections (Shared)
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 12/31/2005
Pre-discount Cost: \$105,182.00
Discount Percentage Approved by the SLD: 81%
Funding Commitment Decision: \$85,197.42 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The dollars requested were reduced to remove: the ineligible services, Cisco IOS RSPx WAN Packet Protocols and related installation.

Funding Request Number: 0000224797 Funding Status: Funded
SPIN: 143005385 Service Provider Name: GE Capital IT Solutions North America, Inc.
Provider Contract Number: 30003000-8
Services Ordered: Internal Connections (Shared)
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 12/31/2005
Pre-discount Cost: \$392,785.00
Discount Percentage Approved by the SLD: 81%
Funding Commitment Decision: \$318,155.85 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The dollars requested were reduced to remove: the ineligible services, Cisco IOS RSPx WAN Packet Protocols and related installation.

Funding Request Number: 0000224800 Funding Status: Funded
SPIN: 143005385 Service Provider Name: GE Capital IT Solutions North America, Inc.
Provider Contract Number: 30003000-8
Services Ordered: Internal Connections (Shared)
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 12/31/2005
Pre-discount Cost: \$1,914,872.00
Discount Percentage Approved by the SLD: 81%
Funding Commitment Decision: \$1,551,046.32 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: Dollars requested were reduced to remove ineligible products Cisco ISO RSPx WAN Packet Protocols, PIX Firewall chassis & licenses, WAN cards, Modem Network Module & licenses and related installation.

Funding Request Number: 0000224805 Funding Status: Funded
SPIN: 143005385 Service Provider Name: GE Capital IT Solutions North America, Inc.
Provider Contract Number: 30003000-8
Services Ordered: Internal Connections (Shared)
Earliest Possible Effective Date of Discount: 07/01/1999
Contract Expiration Date: 12/31/2005
Pre-discount Cost: \$120,175.00
Discount Percentage Approved by the SLD: 81%
Funding Commitment Decision: \$97,341.75 - 471 approved; modified by SLD



April 14, 2000

Mr. Nathan Slater
Director
Management Information Systems
Mississippi Department of Education
P.O. Box 771
Jackson, MS 39205

Dear Mr. Slater.

This letter is intended to provide clarification for the Mississippi Department of Education's (MDE) E-Rate appeal to the FCC.

The Cisco components denied funding on MDE's Year 2 E-Rate Form 471 are eligible for E-Rate discount as per CC Docket NO. 96-45 of the Schools and Libraries Eligibility List. The components in question are the Cisco Internetworking Operating System (IOS) and integrated T1 CSU/DSU's.

As you are aware, both the Cisco IOS and CSU/DSU's are integrated into the chassis of the Cisco Routers and are essential for its connection to MDE's Service Provider. A brief description of each component is listed in the paragraphs below.

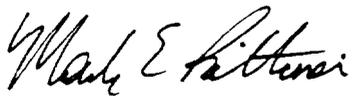
The Cisco IOS RSPx Series WAN Packet Protocols Plus License (Cisco part number FR-WPP75) is a software license that is a required component of the Cisco 7500 series router. This software enables the router to interface between disparate networks. Cisco IOS seamlessly links heterogeneous media and devices across a broad set of protocols. Cisco IOS provides vestibility that allows network growth while keeping up with the rapidly changing operational requirements.

The Cisco 1-Port T1/Fractional T1 with integrated CSU/DSU WAN Interface Card (Cisco part number WIC-1DSU-T1) is an integrated DSU/CSU for T1 or fractional T1 service. It is supported on the Cisco 1600, 1700, 2600 and 3600 Series routers. It provides a cost effective router-DSU/CSU combination with the following features:

- T1 or fractional T1 network interface
- N x 64 kbps or N x 56 kbps no channelized data rates (N=1 to 24)
- Standards based, including ANSI T1.403 and AT&T Publication 624111

Feel free to contact me with questions or issues regarding this matter.

Yours truly,



Mark E. Rittiner
Account Manager
Mississippi State / Local Government

CC DOCKET NO. 96- 45¹

Call Sequencer	A Call Sequencer, also called Automatic Call Sequencer, is a device or adjunct piece of equipment, used with a PBX or Key system. The call sequencer distributes incoming telephone calls among a select number of stations or telephones. It may also be used to answer incoming telephone calls and provide prerecorded announcements to the caller. Some call sequencers are also designed to generate statistical reports on number of calls and how those calls were handled. Call sequencers are not necessary to transport Telecommunications or Internet access to the classroom or publicly accessible rooms of a library, and are not eligible for discount.	No	460
Cartridge Magnetic Tape	Cartridge Magnetic Tape, which holds a magnetic tape of some type and is a storage device, is not eligible for discounts.	No	460
CD Tower	CD ROM Towers are multi-bay CD ROM storage devices used to provide high speed access to text, pictures, video and sound stored on CD ROM discs. Provide in a wide variety of speeds and capacities, CD ROM Towers when used with network servers, offer schools and libraries access to large volumes of data. Storage devices are not eligible for discount.	No	460 461
Channel Service Unit (CSU) Data Service Unit (DSU)	A device to terminate a digital channel at a customer premises. It performs certain line coding, line conditioning and equalization functions, and responds to loop back commands sent from the telephone company central office. A CSU sits between the digital line entering the customer premises from the central office and devices such as channel banks or data communications devices.	Yes	460
Circuit Card	A board with microprocessors, transistors, and other small electronic components. Such a board slides into the slot of a telephone system or personal computer. The circuit card must be a component of an eligible service, or a piece of equipment necessary to transport information to the individual classroom.	Conditional	459 460
CODEC	The coder/decoder, also known as CODEC, is a device comprising an encoder and decoder in the same equipment. The CODEC produces a coded output and compresses and decompresses audio and video signals.	No	460
Communication Server	The communications server is a type of gateway that translates the packetized signals of a LAN to asynchronous signals, usually used on telephone lines. It allows nodes on a LAN to share modems, or host connections.	Yes	459 460

Public Address P.A. System	A system that allows the user to make announcements through the use of amplifiers and speakers. Typically, access is provided through a telephone system either manually or automatically by dialing a preassigned number.	No	459 460
Raceway	Raceway, which is a metal or plastic channel used for holding electrical or telephone wire is conditionally eligible for discounts. Raceway located inside an eligible entity's building (school or library) as well as raceway between eligible buildings located on a single campus (not crossing a public right of way) is eligible for discounts. Raceway used for electrical wiring or for Wide Area Network is not eligible for discount.	Conditional	459 460
Rack Mounted Power Strips	Rack mounted power strips are incidental to equipment racks installed to house eligible equipment. Equipment racks are an eligible component of Internal Connections. Power strips are considered eligible only if they are a bundled component part of an eligible service or product.	Conditional	459 460
RAID	Short for Redundant Array of Independent Disks, RAID is a category of disk that employs two or more drives in combination for fault tolerance and performance. RAID disk drives are eligible only if used in an eligible component.	Conditional	459 460
Relay I/O Module	Uninterruptable Power Supply module that integrates full UPS control into dry contact environments such as PBX's.	Yes	459 460
Remote Access Router	A router on a LAN with a digital DSU/CSU built in for dial up or remote access of a network.	No	459 460
Remote Access Server	Multi Protocol remote access server for dial-in, dial-out and LAN to LAN connections over both analog and digital phone lines. This Server provides flexible TCP/IP address assignment schemes for dial-in users and does not limit its use to those meeting the definition of an eligible Internal Connection.	No	459 460
Routers	Routers are switching devices that can act as an interface between two networks and connect different segments such as departments, or floors in a building. Functionally, routers select the routing path for traffic, may provide network management capabilities, such as load balancing and provide trouble shooting diagnostic capabilities.	Yes	460

Software	Software is only eligible if provided as a component of an eligible Internal Connection. Software for workstations is not eligible for discount.	Conditional	
	<u>Operational Software</u> – software required for server operations.	Yes	460
	<u>Application Software</u> – software such as word processor, spreadsheet, graphics programs, etc.	No	460
	Browser ⁶	No	445
	"E" Mail ⁷	Yes	444
	Fire Wall ⁸	No	460, 444
	Network Administration Software ⁹	No	460
	Network Management Software ¹⁰	No	460
	Web Site Construction Software ¹¹	No	No
Spare Parts	Spare parts are usually hardware stored in a storage closet and are used to replace hardware on the network that fails. Spare parts are not eligible.	No	459 460
Speakerphone	A telephone, or telephone adjunct, which has a speaker and microphone for two way hands free conversation.	No	459 460
Speakers for PC/File Server	Speakers are eligible when bundled as a component of a file server, or other eligible server.	Conditional	459 460
Surge Protector	A device that sits between the customer provided equipment and the commercial AC power outlet. It is designed to protect the equipment from high voltage spikes, or surges, which might damage the equipment.	No	460

⁶ Browsers are provided by Internet Providers. Software additional to that provided in a Bundled Access to the Internet are not subject to discount. (Paragraph 445)

⁷ E-Mail Software, which operates an E-Mail server, is eligible for discounts.

⁸ A method of protecting one network from another untrusted network. The actual mechanism whereby this is accomplished varies widely, but in principle, the firewall can be thought of as a pair of mechanisms: one which blocks traffic and another which permits it. Firewalls are eligible only if provided as a component of the file server and there is no associated cost. Otherwise firewalls are ineligible.

⁹ Network Administration Software (different from network operating software), which provides for minimizing accidental reconfiguration and aiding control of client workstations, is not eligible for discount.

¹⁰ Network Management Software (different from network operating software) specializing in the management of automated hardware and software inventory, configuration management, software metering and auditing and extensive reporting and advanced scripting tools, is not eligible for discount.

¹¹ Web Site Construction Software is not eligible for discounts.