

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Schools and Libraries Universal Service Support Mechanism)	CC Docket No. 02-6
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Modernizing the E-rate Program for Schools and Libraries)	WC Docket No. 13-184
)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”), pursuant to the Public Notice released on August 4, 2014 (DA 14-1130), hereby respectfully submits its comments on the draft eligible services list (ESL) for funding year 2015. As discussed briefly below, the Commission should make two clarifications to the ESL: first, it should explicitly note that because managed WiFi is different from internal connections components, managed WiFi may have different funding support requirements; and second, that requests for support for managed WiFi offers that include both internal connections and Internet Access elements may be submitted in a combined Form 471.

The 2015 Category 2 ESL includes two types of eligible items – broadband internal connection components (internal connections hardware and software), and managed internal broadband services (managed WiFi). Although the \$150 per student cap applies to total Category 2 funding, it is important to recognize that managed WiFi and internal connection components have different functionalities/capabilities and thus will likely require different levels of support (subject to the cap).

As defined in the draft ESL (p. 5), managed WiFi involves “the operation, management and/or monitoring of eligible broadband internal connection components,” which may be either leased to or purchased by the E-rate applicant. Given the difference in functionality and possibly in equipment ownership arrangements, managed WiFi may well have a different rate structure or higher cost per student than that associated with the purchase by the E-rate applicant of the hardware or software on a stand-alone (non-managed) basis. In any analysis of cost-effectiveness or PIA (Program Integrity Assurance) review, the Commission and USAC must recognize that different capabilities involve different prices, and refrain from direct comparisons of the costs of Category 2 managed WiFi versus stand-alone internal connection components.

Some managed WiFi packages, such as Sprint’s Campus Connect offer, include both an internal connections element and Internet Access capability. The Commission should clarify that schools and libraries may submit a combined Form 471 for services such as Campus Connect. Such clarification will help to ensure ease of administration and program efficiency (one of the major goals of E-rate reform),¹ and is consistent with existing Commission policy allowing a single Form 471 for combined telecommunications and Internet Access services.²

¹ *Modernizing the E-rate Program for Schools and Libraries, Report and Order and Further Notice of Proposed Rulemaking* released July 23, 2014, para. 5 (one of the three goals adopted for the E-rate program is “making the E-rate application process and other E-rate processes fast, simple and efficient”).

² *See, e.g.,* 2014 ESL, p. 1 (“Some service offerings provide a combination of both Internet access and telecommunications services...for one price. For administrative convenience, applicants may request combined offerings of service in the Internet access category of service on the FCC Form 471, or, if the service will be provided by a telecommunications carrier, applicants may request such combined offerings in the telecommunications services category of service on the FCC Form 471”).

Respectfully submitted,

SPRINT CORPORATION

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