

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

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

**Comments of ADTRAN, Inc.**

ADTRAN, Inc. (“ADTRAN”) hereby comments on one aspect of the recent Public Notice concerning proposed changes to the Eligible Services List.<sup>1</sup> As explained below, ADTRAN supports the removal of the language from the “Installation, activation, and initial configuration” description that requires installation to be part of a contract or bid for the equipment. ADTRAN believes that this proposed change is consistent with the Commission’s recent E-rate Reform decision.<sup>2</sup>

ADTRAN, founded in 1986 and headquartered in Huntsville, Alabama, is a leading global manufacturer of networking and communications equipment, with an innovative portfolio of solutions for use in the last mile of today’s telecommunications networks. In addition,

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<sup>1</sup> *Public Notice*, “Wireline Competition Bureau Seeks Comment on Draft Eligible Services List for Schools and Libraries Universal Service Program,” DA 14-1130, released August 4, 2014.

<sup>2</sup> *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, FCC 14-99, released July 23, 2014 (hereafter cited as “*E-rate Reform Order*”).

ADTRAN's Bluesocket Division product family includes a suite of innovative wireless LAN solutions that combine virtualized, cloud-enabled control and management with high-performance access points. Bluesocket wireless solutions are ideal for large enterprises, Small and Medium Businesses (SMBs), educational institutions and government agencies seeking to expand wireless coverage to meet the growing demand for always-on wireless access.

ADTRAN's equipment is deployed by some of the world's largest service providers, as well as distributed enterprises and small and medium businesses and schools. ADTRAN thus brings an expansive perspective to the issues surrounding E-rate services.

The Commission recently adopted significant reforms to the E-rate program. One of the changes made by that decision was creation of Preferred Master Contracts,<sup>3</sup> which will allow schools and libraries to acquire Category Two equipment from vendors on those lists without having to go through the FCC Form 470 filing requirement. In addition, the schools or libraries would need to consider the Category Two equipment from the Preferred Master Contracts as part of their bid evaluations, regardless of whether those vendors specifically responded to the FCC Form 470 request for proposals. The use of Preferred Master Contracts will thus allow all schools potentially to benefit from economies of bulk buying, while also simplifying the acquisition process. ADTRAN intends to participate in the Preferred Master Contract program as a vendor.

The Preferred Master Contract process adopted in the *E-rate Reform Order* anticipates that a school or library will separately purchase installation services apart from the acquisition of Category Two equipment from a vendor on the Preferred Master Contract list.<sup>4</sup> The proposed

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<sup>3</sup> *E-rate Reform Order* at ¶¶ 170-176.

<sup>4</sup> *Ibid.* at ¶ 172.

change in the Eligible Services List that “removes phrasing from the ‘Installation, activation, and initial configuration’ description indicating that installation must be part of a contract or bid for the components” will harmonize the Eligible Services List with the adoption of the Preferred Master Contract process. ADTRAN supports this change, because it will ensure that the significant benefits of the Preferred Master Contract process – including savings from bulk purchases and streamlining of the acquisition process – can be realized. This proposed change to the Eligible Services List will thus well serve the public interest, and ADTRAN urges the Commission to adopt this revision.

Respectfully submitted,  
ADTRAN, Inc.

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