

**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
)	
To: The Commission		

COMMENTS OF HEWLETT-PACKARD COMPANY

Hewlett-Packard Company (“HP”) commends the Commission for taking substantial steps to modernize the E-rate program and to provide the funding necessary to ensure schools and libraries can obtain high-speed connectivity to and within their facilities. In response to the Commission’s Further Notice of Proposed Rulemaking, HP offers the following comments:

1. Future funding needs. HP continues to urge the Commission to use this opportunity to adopt comprehensive program reforms that ensure long-term stable and adequate funding of both high-speed broadband and internal connectivity.

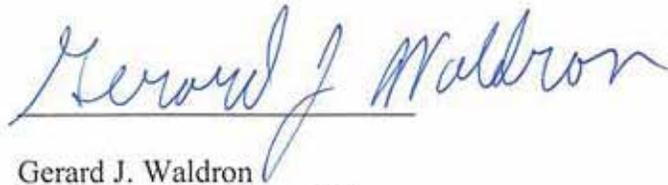
2. Multi-year contracts. HP is concerned that the Order encourages schools and libraries to enter multi-year contracts of up to five years, but does not provide for multi-year commitments and makes “no guarantee of funding” (Par. 125). This could have a particularly negative impact in the context of managed services contracts: a school or library that enters a managed services contract and pays for the first two years of services could be left without equipment if it cannot continue to make payments.

3. Additional steps the Commission can take to further its goals. HP continues to request that the Commission clarify the E-rate procurement rules, consistent with HP's previously-filed comments and its June 6, 2014 *ex parte* notice. As the program provides substantial new funding for internal connections, applicants need technical expertise to assist them in making informed decisions and choosing cost-effective solutions that meet their individualized needs. HP urges the Commission to clarify the rules to allow service providers to work with E-rate eligible entities to assess their technology needs and provide information on available solutions, as part of a fair and open competitive bidding process. In that context, HP supports Comcast's proposal, set forth in comments filed September 16, 2013, that the Commission allow applicants the option of issuing a Request for Information ("RFI") to solicit preliminary input from service providers before they issue a Form 470 or Request for Proposal. As Comcast stated: "schools will be able to use the information obtained through an RFI to craft a more detailed, effective RFP that is, in turn, likely to lead to more competitive bids for the precise services and capabilities the school needs. In other words, encouraging an open process that allows schools and libraries to work with vendors to mold and shape design plans before the formal bidding process begins will help to ensure that the most efficient and cost-effective solutions ultimately are selected." *See* Comments filed by Comcast Corp., at 33, WC Docket No. 13-184 (Sept. 16, 2013); *see also* Letter filed by multiple stakeholders, <http://apps.fcc.gov/ecfs/document/view?id=7521310720> (June 12, 2014) (urging Commission to "[m]odify the procurement rules to allow vendors to provide technical advice on network design to applicants").

In conclusion, as HP has stated previously in this proceeding, the E-rate program needs long-term reform so that internal connections are given at least equal priority; applicants have flexibility, predictability and equitable funding; the program supports new technologies that will meet applicants' needs in a cost-effective manner well into the future; and public-private partnerships and sharing of technological expertise with schools and libraries are permitted and encouraged.

Submitted by:

Hewlett-Packard Company

A handwritten signature in blue ink that reads "Gerard J. Waldron". The signature is written in a cursive style and is positioned above a horizontal line.

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