

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

REPLY COMMENTS OF ALCATEL-LUCENT

Alcatel-Lucent is pleased to submit these Reply Comments in the above-captioned proceeding, seeking comment on the draft Eligible Services List (ESL) for Schools and Libraries Universal Service Program. In this submission, Alcatel-Lucent requests that the Bureau clarify that Category Two internal connections equipment is eligible for E-rate funding when it is used on school property separate from the main campus building in cases where the separate property requires a broadband access connection distinct from the connection that serves that main building. This clarification would permit a virtual private connection to the school's main campus network when a direct connection is not practical.

In Alcatel-Lucent's experience, we have repeatedly encountered circumstances where teachers and students would benefit from access to LAN and WLAN (managed Wi-Fi services) in various locations that are considered school property, but may be unconnected to the main campus. Examples of educational spaces away from the main school building include buildings near the athletic fields, temporary structures or trailers often used for over-crowded schools, mobile libraries and science labs, and even school buses. In these locations, broadband internet service access may not be available directly from the main campus, but would require another form of data connection to the primary broadband Internet access service.

Alcatel-Lucent's request in these Reply Comments is narrowly tailored and *does not extend to the broadband access service for these distinct locations*. Rather, Alcatel-Lucent asks only that the Bureau clarify that the internal LAN, WLAN, Router and other Category 2 equipment already listed in the ESL, and required to provide access within these remote learning locations, are eligible for E-Rate funding.

Alcatel-Lucent submits that these locations are extensions of the restricted school network and should have the same policy implemented in the main campus network. Of paramount importance, the focus of these broadband connections must be educational. They would be subject to the same broadband services access requirements as the rest of the school campus, and have the same value as an internal connection. All these areas must be protected by the school policy management and use the same firewall/content management functions that assure that only school data traffic associated with the school education mission (and not unrestricted Internet access) is allowed at all times. In short, this solution would result in a virtual private connection to the main school campus when a direct connection is impractical.

Alcatel-Lucent's request for clarification is far from hypothetical. Alcatel-Lucent, through its Enterprise business, has deployed various solutions as part of LAN and WLAN strategy in schools. These solutions include LAN switches, WLAN controllers, Access Points and also Enterprise Service Router which also provide all in one LAN connections, WLAN services and various data connections (VPN, LTE, Ethernet, WAN, etc.). They can be all deployed on the main campus building, remote buildings, external areas, ruggedized in restricted areas, and even inside of school buses to create an internal LAN/WLAN.

These areas are vital for the complete coverage and access to broadband Internet services for most, if not all, school districts. Each school district is made up with unique geography, and the provisioning of internal connections needs to consider this when

