

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

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In the Matter of)	
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Schools and Libraries Universal Service)	WC Docket No. 13-184
Support Mechanism)	
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**REPLY COMMENTS ON THE FY 2016 DRAFT ELIGIBLE SERVICES LIST
FOR THE SCHOOLS AND LIBRARIES UNIVERSAL SERVICE MECHANISM
(DA 15-615)**

E-Rate Central submits these Reply Comments in response to the FCC’s Public Notice released May 21, 2015 (designated DA 15-615) seeking comment on USAC’s proposed Eligible Services List (“ESL”) for Funding Year 2016.

E-Rate Central is an independent firm providing E-rate application and consulting services to schools and libraries nationwide. It also provides E-rate support services for several states and is an active member of the State E-Rate Coordinators’ Alliance (“SECA”).

Network Sustainability

The Commission’s E-Rate 2.0 Orders, together with the President’s ConnectED initiative, established broadband connectivity speed and bandwidth goals that recognize the critical online needs of schools and libraries in the areas of research, instruction, assessment, and administration. These broadband networks have become so important that implementing E-rate rules —most specifically, the Eligible Services List — must be clarified and/or augmented to provide support, not just for increased network bandwidth, but for network sustainability.

Several of the ESL initial comments filed addressed aspects of network reliability, including;

- [CRW Consulting](#) discussed the FCC’s “overly-rigid approach” to duplicative services.
- [EducationSuperHighway](#) provided a number of recommendations and clarifications regarding fiber networks and related services.

- [New York City Department of Education](#) sought clarification on the type of equipment for a fiber network that is eligible for Category 1 funding.

E-Rate Central concurs with these comments, but believes that the Commission must take a broader view on the design needs of broadband and Internet access networks for schools and libraries, and on the eligibility of the required products and services required to meet these design objectives. Within reason, as discussed below, this may mean accepting some degree of redundancy to protect networks otherwise subject to single points of failure.

In fields other than education, the Commission has already taken steps to recognize the importance of network sustainability in key economic sectors. Specifically:

1. Most broadly, in its 2011 *Notice of Inquiry* ([PS 11-60](#)), the Commission undertook “a comprehensive examination of issues regarding the reliability, resiliency and continuity of communications networks” for the Nation’s infrastructure as a whole.
2. More narrowly, in the companion USF Rural Health Care Program, the Commission’s 2012 Report and Order ([FCC 12-150](#)) addressed the issue of network sustainability by tacitly noting that “Commenters agree that HCPs [health care providers] need certain minimum levels of reliability, redundancy, and quality of service.”

Education deserves no less. In an era in which a network failure, for example, would wreak havoc in the midst of an online assessment period, school networks also require a certain level of protection. Fear of network failure may also hinder efforts to more thoroughly integrate online resources into instructional curriculums.

Within the context of the Eligible Services List for FY 2016, E-Rate Central recommends:

1. Restore the Category 2 eligibility of network servers (still eligible under the RHC program), plus related monitoring equipment and software, for internal broadband networks. Such a change would be consistent with providing applicants with the same tools utilized by third-parties under Managed Internal Broadband Services.
2. Broadly define the Category 1 eligibility of all “equipment necessary to make broadband service functional.” Ideally, this would include all or most of the network operating center (“NOC”) equipment listed in the NYCDOE comments.
3. Explicitly recognize that network reliability is an important component of cost-effectiveness, and that some degree of redundancy — if only to eliminate a single point of failure — is not a basis for denying E-rate support. At a minimum, this means:
 - a. Avoiding an inflexible definition of “duplicative services,” as argued in CRW Consulting’s comments.
 - b. Clarifying the eligibility of firewall services, “no matter the nature of the architecture and implementation,” as proposed by EducationSuperHighway.

- c. Reiterating a principle of the [Macomb](#) decision that necessary services, provided by a second provider, are supported at least up to the pricing level of the lowest-cost provider.

Longer-term, E-Rate Central recommends that the Commission initiate a more targeted version of its 2011 *Notice of Inquiry* to help define cost-effective standards of E-rate-supported networks for schools and libraries.

Respectfully Submitted by:



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July 2, 2015