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Attorneys for Appellant  
Technologies for Tomorrow, Inc.

**RECEIVED**  
OFFICE OF PUBLIC ACCOUNTABILITY  
PROCUREMENT APPEALS

DATE: May 9, 2016

TIME: 9:07  AM  PM BY: Chic R

FILE NO OPA-PA: 16-004

OFFICE OF PUBLIC ACCOUNTABILITY  
GUAM

IN THE APPEAL OF  
TECHNOLOGIES FOR TOMORROW, INC.  
Appellant.

APPEAL NO. OPA-PA-\_\_\_\_\_

**PROCUREMENT APPEAL**

Technologies for Tomorrow, Inc. ("TFT") hereby appeals an April 22, 2016 decision rendered by the Guam Department of Education of the of the government of Guam ("GDOE"), denying TFT's protest of the Bid Status Intent to Award GDOE IFB 010-2016 (Multi-Step) for E-Rate Internal Connections - Wireless Local Area Network (WLAN) Installation Services to Docomo Pacific, Inc.

**I. Appellant's Information.**

Technologies for Tomorrow Inc.  
6235 North Davis Highway, Suite 117  
Pensacola, Florida 32504  
(850) 478-5222  
Attn: Daniel Coco, Vice President

For the purposes of this appeal, direct all correspondence to TFT's counsel, Vince C. Camacho, Esq., [vcamacho@icclawgroup.com](mailto:vcamacho@icclawgroup.com), Iriarte • Camacho • Calvo Law

Group LLC, 134 W. Soledad Ave, Suite 401, Hagåtña, Guam 96910.

## **II. Solicitation Information.**

This appeal pertains to the GDOE E-Rate Network (GENET) 2016 – E-Rate Internal Connections – Wireless Local Area Network (WLAN) Installation Services IFB No. 010-2016 (Multi-Step). Bidders are required to install (expanding) the WLAN infrastructure at the following GDOE schools: 1) George Washington High School; 2) Okkodo High School; 3) Southern High School; 4) John F. Kennedy High School; 5) Tiyan High School; 6) Agueda Johnston Middle School; 7) Astumbo Middle School; 8) F.B. Leon Guerrero Middle School; 9) Inarajan Middle School; 10) Jose Rios Middle School; 11) L.P. Untalan Middle School; 12) Oceanview Middle School; and 13) Vicente Benavente Middle School. The GDOE WLAN was designed to support the WLAN expansion to increase Wi-Fi coverage in all schools.

On March 4, 2016, GDOE issued Bid Status for GDOE IFB 010-2016 recommending an award to Docomo Pacific.

## **III. Concise Statement of the Grounds for Appeal.**

**A.** GDOE failed to objectively evaluate the bid submissions for GDOE IFB 010-2010. TFT's bid was the lowest, most responsible bid.

**B.** GDOE improperly presumed and concluded that Docomo Pacific's acknowledgement of receipt for Addendum 2 would correct any of its bid discrepancy. Docomo's acknowledgement merely indicates a receipt of the amendments.

**C.** GDOE improperly recommended GDOE IFB 010-2016 for award to a nonresponsive bidder, namely, Docomo Pacific.

#### IV. Background.

##### A. GDOE IFB 010-2016

On January 8, 2016, GDOE issued Invitation for Bid No. 010-2016 for E-Rate Internal Connections – Wireless Local Area Network (WLAN) Installation Services. GDOE intends to procure services from a vendor capable in expensing the Wireless Area Network (WLAN) infrastructure for all of GDOE's high schools and middle schools. The GDOE WLAN system was designed to support this expansion.

##### B. Amendments (Addenda)

On January 12, 2016 GDOE issued Addendum 1 which provided the dates for the Pre-Bid Conference and Site Visits.

On January 26, 2016 GDOE issued Addendum 2. This addendum made a number of revisions to IFB 010-2016, namely:

##### **Attachment A, Page 7, Section D.5 – Hardware Details, Subsection D.5.1.3.1**

**From:** Brocade ICX6540-24P switch, 24 port, 1 GB, PoE+ 390W, 2x1GSFP or approved equivalent or better.

**To:** Brocade ICX6450-24P, 24-port 1GbE switch PoE+ 390 W. 2x1 GbE SFP+ and 2x10 GbE SFP+ uplink/stacking ports (1GbE SFP+ upgradable to 10GbE) or approved equivalent or better.

##### **Attachment A, Page 7, Section D.5 – Hardware Details, Subsection D.5.1.3.2**

**From:** Two SFP for multi-mode fiber uplink.

**To:** Two SFP required for stacking and must be compatible and approved by switch manufacturer to avoid any issue on warranty and/or support.

##### **Attachment A, Page 7, Section D.5 – Hardware Details, Subsection D.5.2.1.1**

**From:** Provide additional device licensing for added switches to the BNA or equivalent to allow monitoring of switches added during and after the contracted WLAN expansion.

**To:** Provide additional device licensing for adding switches to the BNA or

equivalent to allow monitoring, managing and configuring during and after the contracted WLAN expansion.

**Attachment A, Page 12, Section D.5 – Hardware Details, Subsection D.5.3.7.8**

**From:** Restore the original Ethernet outlet.

**To:** The Bidder shall restore the disconnected data cable from the WAP removed for relocation back to the original Ethernet Outlet port. The Bidder shall test and activate the restored Ethernet outlet port for LAN broadband connection.

**Attachment A, Page 14, Section D.7 – Furnish WLAN Equipment, Subsection D.7.7**

**From:** Bidder shall have the equivalent equipment readily available to demonstrate and test during the technical proposal evaluation scheduled on the day after the closing of the Bid.

**To:** Bidder shall have the equivalent equipment readily available to demonstrate and test during the technical proposal that may be schedule within seven (7) working days after the closing of the Bid.

Addendum 2 also provide responses to questions posed by TFT and Docomo Pacific, the two bidders for this IFB.

On February 4, 2016 GDOE issued Addendum 3. Addendum 3 provided the Sign-In sheets for the Pre-Bid Conference/Site Visit that took place on Thursday January 14, 2016 and Friday, January 15, 2016.

**C. GDOE's Bid Status**

On March 4, 2016 GDOE issued Bid Status for GDOE IFB 010-2016 recommending an award to Docomo Pacific. Exhibit A.

**D. TFT's Protest**

On March 25, 2016 TFT protested the recommended award in the GDOE IFB 010-2016 based on the proposed awardee's non-responsive bid. On March 28, TFT supplemented its protest when it received GDOE's response of TFT's FOIA request

on March 24, 2016. Exhibit B.

**E. Notice of Stay of Procurement**

On March 28, 2016, GDOE issued a Notice of Stay of Procurement.

**F. GDOE Denies TFT's Protest**

On April 22, 2016 GDOE denied TFT's protest in the entirety and was advised of its right to seek administrative or judicial review. Exhibit C.

**V. Grounds for Appeal.**

At issue in this Appeal is whether GDOE violated the Guam Procurement law and its rules and regulations. TFT asks the OPA to find that GDOE violated the procurement law and regulations and as a result GDOE should award the bid to the next lowest responsible and responsive bidder whose bid meets the requirements and criteria set forth in the IFB. *See* 5 GCA § 5211(g).

Section 5201 of Title 5, Guam Code Annotated, defines a "responsive bidder" as "a person who has submitted a bid which confirms in *all material respects* to the Invitations for Bids." 5 GCA § 5201(g) (emphasis added). Docomo's bid did not meet the material or minimum requirements as stated in the GDOE IFB 010-2016 ("IFB") as discussed below.

**A. IFB Section D.5.1.3 Power over Ethernet edge switches for WAP's**

IFB Section D.5.1.3 requires that the bidders provide power over Ethernet edge switches for WAP's. Specifically, D.5.1.3.1 required Brocade ICX6540-24P switch, 24 port, 1 GB, PoE+ 390W, 2X1GSFP or approved equivalent or better and D.5.1.3.2 requires two SFP for multi-mode fiber link. Addendum 2 changed the specifications to Brocade ICX6450-24P, 24 port 1GB witch PoE+ 390W, 2X1 GbE SFP+

2X10 GbE SFP+ uplink stacking ports (1 GbE SFP+ upgradeable to 10GbE) or approved equivalent or better and two SFP required for stacking and must be compatible and approved by switch manufacturer to avoid any issue on warranty and/or support. In response to bidder's questions (found in Addendum 2), GDOE provided that the WLAN PoE+ shall connect to existing LAN switch (Brocade ICX 6450) with a 10G connection; no RJ45 ports shall be used; and GDOE requires a 10G connection between the LAN switch and the WLAN PoE+.

Docomo's bid offered the following: Brocade ICX6540-24P switch, 24 port, 1GB, PoE+ 390W, 2xGSFP or approved equivalent or better with two SFP multimode fiber uplinks to be supplied. Docomo's bid is deficient because its proposed switch failed to comply with the amendment in Addendum 2 that required the switch to upgradeable to 10GbE.

GDOE agrees with TFT's finding that Docomo's bid did not meet the requirements of the IFB and the subsequent Addendum 2. However GDOE, without any authority, stated that because Docomo acknowledged Addendum 2, Docomo's deficient bid makes Docomo's bid responsive. Acknowledgment of amendments are required to acknowledge receipt amendments and not a bidder's intent to comply with the IFB or the amendments. See 2 GAR § 3109(c)(6). GDOE's conclusion that acknowledgment of changes set forth in an amendment cannot correct a bidder's submission and if it is determined that the submission is deficient, GDOE should not be allowed to recommend an award to a nonresponsive bidder.

**B. IFB Section D.5.2.3.1 ClearPass licensing, as required.**

Section D.5.2.3.1 requires the bidders to provide additional licensing for

Authorization and Network Access for the specified number of User End Points. Docomo submitted "Clear pass licensing will be provided accordingly for Authorization and Network Access for the specified number of user points. In an email to TFT, the provider states that ClearPass licensing is not sold, or supported, as an Access Point (AP) quantity deployment model. The bid request is not sound and will result in a non-working solution." Exhibit D.

Again, in this instance GDOE agreed that Docomo did not provide the required specifications. And once again, GDOE's response is that Docomo's bid is responsive due to Docomo's acknowledgement of Addendum 2. For the reasons stated above, GDOE's conclusion that acknowledgment of changes set forth in an amendment cannot correct a bidder's submission and if it is determined that the submission is deficient, GDOE should not be allowed to recommend an award to a nonresponsive bidder.

**C. IFB Section D.7 Furnish WLAN Equipment**

IFB Section D.7.1 requires the bidder to provide the complete description and specifications of the WLAN equipment to be furnished in its Technical Proposal. Section 7.1 requires the bidder to provide the "complete" description and specification of the WLAN equipment to be furnished in its bid. Docomo submitted the following:

Aruba Instant IAP-225 Wireless Access Point 802.11n/ac 3x3:3 dual radio.
AP 3 Year Replacement Warranty
AP Manufacture Care Support Service
AP Mounting Kits
Brocade ICX6540-24 Switch, 24 Port, 1GB, PoE+ 390W, 2X1GSFP
POE Edge Switch 3 Yr Replacement Warranty
POE Edge Switch Manufacture Care Support Service

Multimode SFP for Brocade ICX6540-24P
Cabling CAT5 or better
Raceway Conduit
PVC Conduit/Flexible Conduit per AP
Red Patch Cables from Patch Panel to POE Switch
Fiber Patch LC to SC; OM3 Multimode/ 50-125 laser optimized.

In its Protest, TFT argued that Docomo's bid was deficient because Docomo's bid failed to include the description and specification for any of the components in their proposed list and thus it is not possible to conduct an "objective" evaluation to determine if the proposed specifications meet GDOE's needs. See 5 GCA § 5211(e).

In support of its claims, TFT sought the manufacture's comment on Docomo's submission. The manufacturer responded as follows:

- 1) In the switch description, it says 2X1GSFP. I don't know if that means they include two 1G SFP's or if the switch just accepts two 1G SFP's.
- 2) "POE edge switch 3yr replacement warranty "probably describes our default warranty on the equipment, however, it doesn't include replacement of the SFP's
- 3) "POE edge switch manufacturer care support service" does not indicate what level of support, nor for how long. Our lowest level of support does not include replacement warranty for the SFP's
- 4) "Multi-mode SFP for Brocade ICX6450-24P does not indicate 1G or 10G, but more troubling, it doesn't say if it is a Brocade SFP or just a third party "equivalent". Use of third party optics, commonly done to try to save money, voids the warranty of our switches.
- 5) Finally, there are no stacking cables included, which would preclude the ability to stack with existing switches.

See Exhibit E (email from Ken Hellmann – Brocade). Brocade's correspondence is a clear indication that Docomo's bid is deficient. A copy of Brocade's response was provided to GDOE as an exhibit to the Protest.



Docomo also bid a Fiber patch LC to SC; OM3 multi-mode, 50/125 laser optimized. TFT provided illustrations as to why this description and specification is required. Exhibit F. TFT also provided that Docomo's bid provided a system that does not provide functional stacking. Exhibit F. It is clear from the diagram that what Docomo proposed will not work. See Exhibit G (manufacturer specifications that 10G requires only the LC optic cables). Based on this diagram and the manufacturer's specifications, an objective evaluation should have determined that Docomo's bid was materially deficient and should have further concluded that Docomo's bid as nonresponsive.

Additionally, Docomo also submitted the following:

ClearPass licensing for NEW AP
Airwave Wireless Management Suite licensing for NEW AP
ClearPass licensing for NEW AP

With regard to the software, TFT once again sought clarification from the provider with regard to Docomo's submission. According to the provider, "ClearPass licensing is not sold or supported as an Access Points (APs) quantity deployment model. The attached [ ] ClearPass software bid request portion is not sound and will result in a non-working solution." Exhibit D. If GDOE objectively evaluated Docomo's bid GDOE should have found Docomo's bid to be deficient and nonresponsive.

Section 5211(e) provides that bids will be unconditionally accepted without alteration or correction. 5 GCA §5211(e). Correction or withdrawal of inadvertently erroneous bids before or after award, or cancellation of awards or contracts based on such bid mistakes, will be permitted by regulations. 5 GCA § 5211(f). Any decision to permit the correction or withdrawal of bids, or to cancel awards or contracts

based on bid mistakes, must be supported by a written determination made by the procurement officer. Id. And, a contract will be awarded to the lowest responsible bidder whose bid meets the requirements and criteria in the IFB. 5 GCA § 5211(g)

GDOE must accept Docomo's bid unconditionally as submitted. The facts indicate that GDOE failed to properly evaluate Docomo's bid and that GDOE glossed over Docomo's submission. GDOE did not recognize Docomo's discrepancy. GDOE's failure to discover Docomo's bid discrepancy is a clear indication that GDOE either failed to follow its own evaluation factors established in the IFB and the subsequent amendments, or, GDOE is favoring Docomo. Whatever the case may be GDOE must be held accountable to ensure that the evaluations are done in an "objective" way. See 5 GCA § 5211(e). If GDOE conducted an objective review as required by law, GDOE should have found the deficiencies during the evaluation and found Docomo's proposed solution for was insufficient because Docomo did not meet the minimum requires of the IFB as amended by Addendum 2.

GDOE also cannot avail of regulatory provisions governing mistakes in bid submissions. Section 5211(f) of the Guam Procurement law required GDOE to revert to the procurement regulations and permit the correction which must be supported by a written determination by the procurement officer. 5 GCA § 5211(f). The Guam Administrative Rules and Regulations permit mistakes be corrected or withdrawn in certain cases where bids have been opened but not awarded. 2 GAR § 3109(m).<sup>1</sup> Minor informalities may be waived or corrected without prejudice to other bidders, that is that the effect on price, quantity, quality, deliver, or contractual conditions are

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<sup>1</sup> Correction or withdrawal of a bid because of inadvertent, nonjudgement mistakes in the bid required careful consideration to protect the integrity of the competitive bidding system, and to assure fairness. 2 GAR § 3109(m).

negligible.<sup>2</sup> If the mistake was evident in the bid, the bid shall be corrected and the bid may not be withdrawn; examples include typographical errors, errors in extending unit prices, transportation errors, and arithmetical errors. 2 GAR § 3109(m)(4)(C). If the mistake in the bid is not evident, the bidder may be permitted to withdraw if (1) the mistake is clearly evident on the face of the bid document but not in the bid itself; or (2) the bidder submits proof of evidentiary value which clearly and convincingly demonstrates that a mistake was made. § 3109(m)(4)(D)(1) & (2). The problem for GDOE at this point is that it failed to make identify a mistake and make a written determination of the existence of the mistake.

Instead of complying with the law and the regulations, GDOE provided in its denial letter that Docomo's acknowledgment of Addendum 2 cures any discrepancy in its Bid. *GDOE Response to Protest Letter* (Apr.22, 2016) p. 4. GDOE's conclusion is not based on any authority and lacks merit and warrants reversal. GDOE violated §5211(f) because there was no written determination made acknowledging the mistake. GDOE did not discover the mistake until TFT presented the issue in its Protest. GDOE cannot and should be granted the ability to hide behind a signed acknowledgment of an addendum. Docomo's acknowledgment of the amendment does not make its bid responsive, rather it highlights and provides evidence that Docomo's bid ignored the requirements of the IFB. Docomo should not be rewarded for submitting a deficient bid.

Interestingly, GDOE never disputes TFT's assertions, rather, GDOE attempts to justify its decision by hiding behind Docomo's acknowledgement of Addendum 2.

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<sup>2</sup> Negligible acts include the bidders failure (1) return of the number of signed bids required by the IFB; (2) sign the bid; and (3) acknowledge receipt of an amendment to the IFB;

The law requires that to objectively evaluate whether Docomo's bid meets minimum requirements, GDOE must take Docomo's bid at face value and not "presume" that because Docomo acknowledged the Addendum, any errors or mistakes in the bid are cured. Such a presumption is not only ridiculous but contravenes the procurement law and regulations. GDOE's response is not supported by the law or the regulations and should be reversed and TFT's appeal upheld.

GDOE's conclusion and reasoning behind accepting Docomo's bid contravenes the Guam Procurement law and regulations and TFT's Appeal should be granted.

#### **VI. Ruling Requested.**

1. TFT requests that the bid award or the issuance of purchase orders and/or contracts be stayed as required by law until a final resolution had been made. TFT noted above that no award has been issued as of the filing of this appeal. In the event an award has been made prior to this appeal being filed, TFT hereby requests that such award be null and void as required by law.

2. GDOE's proposed bid award for GDOE IFB 010-2016 to Docomo Pacific Inc. be rescinded because its bid did not conform to the requirements of GDOE IFB 010-2016.

3. TFT also requests for an order that TFT be awarded the bid for GDOE 010-2016 as it was only other bidder to meet the minimum requirements of the IFB.

4. Finally, TFT's request for an order that it be granted reimbursement of its costs incurred in preparing this Protest and Appeal. 5 GCA § 5425(h).

**VII. Supporting documentation**

Supporting exhibits are attached as Exhibits A through G.

**VIII. Names of Competing Bidders, Offerors, or Contractors Known to Appellant**

- A. Technologies for Tomorrow, Inc.
- B. Docomo Pacific Inc.

**IX. Declaration Regarding Court Action**

Pursuant to 5 GCA Chapter 5, unless the court requests, expects, or otherwise expresses interest in a decision by the Public Auditor, the Office of Public Accountability will not take action on any appeal where action concerning the protest or appeal has commenced in any court.

The undersigned party does hereby confirm that to the best of his knowledge, no case or action concerning the subject of the Appeal has been commenced in court. All parties are required to and the undersigned party agrees to notify the Office of Public Accountability within 24-hours if court action commences regarding this Appeal or the underlying procurement action.

**X. Request for Hearing**

TFT requests a hearing on this Appeal.

DATED: Hagåtña, Guam, May 9, 2016.

IRIARTE • CAMACHO • CALVO  
LAW GROUP LLC

  
\_\_\_\_\_  
VINCENT C. CAMACHO  
Attorneys for Appellant  
Technologies for Tomorrow, Inc.

**VERIFICATION**

STATE of FLORIDA     )  
  ) SS.  
ESCAMBIA, COUNTY    )

I, Pamela L. Coco, as President of Technologies for Tomorrow Inc. am authorized to make this verification.

I have read the foregoing Procurement Appeal and, to the best of my knowledge, the information stated here in is true and correct.

I declare under penalty of perjury that the foregoing is true and correct and this verification was executed on this 7 day of May, 2016.

  
**PAMELA L. COCO, President - Vice**

SUBSCRIBED AND SWORN to before me, a Notary Public, in and for State of Florida by PAMELA L. COCO, as <sup>Vice</sup> President of Technologies for Tomorrow Inc., this 7 day of May 7, 2016.



  
**NOTARY PUBLIC**

# EXHIBIT A



JON J.P. FERNANDEZ  
Superintendent of Education

DEPARTMENT OF EDUCATION  
OFFICE OF SUPPLY MANAGEMENT  
[www.gdoe.net/procurement](http://www.gdoe.net/procurement)  
500 Mariner Avenue  
A-Building, Suite A-13  
Barrigada, Guam 96913  
Telephone: (671) 475-0438/Fax: (671) 472-5001  
Email: [procurement@gdoe.net](mailto:procurement@gdoe.net)



CARMEN T. TAITANO  
Supply Management Administrator

**BID STATUS**

March 4, 2016

Technologies For Tomorrow Inc.  
6235 North Davis Highway  
Suite 117  
Pensacola, Florida 32504  
Tel: (850) 478-5222  
Fax: (850) 478-1881  
Email: [pamc@tftcomputers.com](mailto:pamc@tftcomputers.com)

Attn: Pamela L. Coco  
Vice President and Owner

Bid no.: GDOE IFB 010-2016 OPENED: Monday, February 29, 2016 at 10:00 AM

Description: E-RATE INTERNAL CONNECTIONS – WIRELESS LOCAL AREA NETWORK (WLAN) INSTALLATION SERVICES

The following is the evaluation results of subject bid: Refer to items checked below.

- Cancelled (in its entirety), or partially cancelled due to:
  - Insufficient funds
  - Change of specifications
  - Insufficient number of bidders
- Not recommended due to:
  - Late submission of bid
  - No bid bond submitted, as required by Section 2.5.5 titled Bid Bond requirement
  - Non-conformance with Specifications
  - Others: \_\_\_\_\_

Bid is recommended for award to:  
**Docomo Pacific, Inc.** Bid Total: \$430,688.26

Remarks: The following bidder did not submit the lowest most responsive and responsible bid:

**Technologies For Tomorrow, Inc.** Bid Total: \$503,677.00

Sincerely,

CARMEN T. TAITANO  
Supply Management Administrator

**ACKNOWLEDGMENT RECEIPT**

\_\_\_\_\_  
Signature

Date: \_\_\_\_\_ Time: \_\_\_\_\_



# EXHIBIT B

Technologies for Tomorrow, Inc.  
6235 North Davis Highway  
Suite 117  
Pensacola, Florida USA 32504  
Telephone: 850-478-5222 Fax: 850-478-1881



March 25, 2016

Ms. Carmen T. Taitano  
Supply Management Administrator  
CC: Kathrina Bayson  
Buyer Supervisor II  
Office of Supply Management  
Guam Department of Education  
500 Mariner Avenue, Barrigada, GU 96913-1608

Subject: Protest Award of IFB 010-2016 to Docomo Pacific  
Dear Ms. Taitano,

Technologies for Tomorrow Inc. ("TFT") under G.C.A. 5 § 5425(a) hereby protest the award decision to Docomo Pacific as the lowest responsible bid made by the General Services Agency ("GSA") in the above referenced bid IFB 010-2016 and evidenced by the GSA Notice of Intent to Award sent to (TFT) by GSA on March 4, 2016((1) Exhibit A.1) Bid Status and Proprietary Data Form Results dated March 4, 2016, sent by Kathrina O. Bayson.

Per Guam procurement regulations, protests shall be made in writing to the Chief Procurement Officer, the Director of Public Works, or the head of a Purchasing Agency, and shall be filed in duplicate within 14 days after the protestor knows or should have known of the facts giving rise thereto. A protest is considered filed when received by the Chief Procurement Officer, the Director of Public Works, or the head of a Purchasing Agency.

Technologies for Tomorrow Inc. will be sending by DHL two originals to:

Ms. Carmen T. Taitano  
Supply Management Administrator  
CC: Kathrina Bayson  
Buyer Supervisor II  
Office of Supply Management  
Guam Department of Education  
500 Mariner Avenue, Barrigada, GU 96913-1608

ICC000004

On March 18, 2016 GSA provided (TFT) with a copy of the Docomo Pacific Bill of Materials for IFB 010-2016 and Docomo Pacific Bid Proposal, available only by obtaining the documentation under the Freedom of Information Act. These facts were not known to Technologies for Tomorrow Inc. until documentation was provided to (TFT) under the Freedom of Information Act on March 18, 2016, and March 24, 2016, clearly making our protest conform within 14 days after the protestor knows or should have known of the facts giving rise thereto.

TFT is still waiting for documents requested electronically on March 24, 2016 from Ms. Lamb and will add to the protest if more deficiencies are found under our FOIA dated March, 18, 2016.

The following emails and attached Exhibits provide evidence of when Technologies for Tomorrow Inc. received the letter, documents requested by FOIA are ready for pickup or delivered electronically by email to Technologies for Tomorrow Inc.

In addition, evidence Exhibits A.1 through A.8, B through B.5, and C.1 are included in Section: (Attachments of Evidence Exhibits) at the end of this document in electronic form.

**Daniel Coco**

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**From:** Kathryn O. Boyson <kboyson@gsoe.net>  
**Sent:** Friday, March 04, 2016 8:45 AM  
**To:** Daniel Coco; Pamela Coco  
**Subject:** IFB 010-2016 Bid Status and Proprietary Data notice  
**Attachments:** IFB 010-2016 -- Letter re Proprietary Data, Bid Status - Technologies For Yourxxxxx.pdf

Hello,

Please see attached documents for IFB 010-2016, E-Rate External Connections - Wireless Local Area Network (WLAN) Installation Services:

- IFB 010-2016 Bid Status
- Notice of Denial of Request to Designate Information as Proprietary Data

Kindly sign acknowledgment for both documents and send via fax to (671) 472-3001 or via email to [kboyson@gsoe.net](mailto:kboyson@gsoe.net)

If you have any questions, please feel free to email me.

Regards,

Kat

**Kathryn Boyson**  
Buyer Supervisor II  
Office of Supply Management  
Oman Department of Education  
500 Mariner Avenue, Hattigoda, GU 96913-1608  
Tel: 671-300-1582 | Fax: 671-472-3001  
Email: [kboyson@gsoe.net](mailto:kboyson@gsoe.net)

Visit our website at [www.edoe.net/www/contracts](http://www.edoe.net/www/contracts)

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ICC000006

Daniel Coco

From: Kathrina O. Bayson <kbayson@pde.usvt>  
Sent: Friday, March 04, 2016 11:00 AM  
To: Daniel Coco  
Subject: Re: FCI FB 010-2016 Bid Form

Hi Daniel,

I have forwarded your Freedom of Information request to our Legal Department as they are the ones that handle FOIA requests. They should be responding to you shortly.

Regards,

Kat

**Kathrina Bayson**  
Buyer Supervisor II  
Office of Supply Management  
Custom Department of Education  
500 Main Street, Haverhill, MA 01830-1608  
Tel: 671-320-1582 | Fax: 671-472-5001  
Email: [kbayson@pde.usvt](mailto:kbayson@pde.usvt)

Visit our website at [www.pde.usvt/procurement](http://www.pde.usvt/procurement)

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On Fri, Mar 4, 2016 at 1:30 PM, Daniel Coco <[daniel.coco@tomorrowinc.com](mailto:daniel.coco@tomorrowinc.com)> wrote:  
Thank you for the update. Would have preferred a different result but hope the winning bidder delivers it as specified.

Under the freedom of information act I request a copy of the winning price bid form.

With regard,

Daniel Coco  
VP of Sales  
Technologies for Tomorrow Inc.

On Mar 4, 2016, at 08:50, Kathrina O. Bayson <[kbayson@pde.usvt](mailto:kbayson@pde.usvt)> wrote:

Just sent to you. Thank you for your patience!

ICC000007

Daniel Coco

From: Emmanuel O. Lamb <olamb@gsaa.net>  
Sent: Monday, March 14, 2016 1:15 PM  
To: Daniel Coco  
Subject: Re: FOIA Request dated March 4, 2016 re: GDOE #B 010-2016  
Attachments: 031116 FOIA Response Documents to Daniel Coco re #B 010-2016.pdf

Mr. Coco,

Per your request, please see attached documents in response to your FOIA Request dated March 4, 2016. Please acknowledge receipt via email to [jsai-admin@gsaa.net](mailto:jsai-admin@gsaa.net). Thank you!

On Fri, Mar 11, 2016 at 7:25 PM, Daniel Coco <[dancoco7@icloud.com](mailto:dancoco7@icloud.com)> wrote:

Thank You for the letter. We would like to receive electronically and pay by credit card. We have also submitted a FOIA request on 03/18/2016 for the BCM for #B 010-2016. Would it be best to wait for this request to be approved and pay all at one time? Please let us know the amount and we will pay by credit card.

Let us know.

Daniel Coco

VP of Sales

Technologies for Tomorrow Inc.

From: Emmanuel O. Lamb [mailto:[olamb@gsaa.net](mailto:olamb@gsaa.net)]  
Sent: Friday, March 11, 2016 1:48 PM  
To: [dancoco7@icloud.com](mailto:dancoco7@icloud.com)  
Subject: FOIA Request dated March 4, 2016 re: GDOE #B 010-2016

Please see attached letter dated March 11, 2016. Please acknowledge receipt via email to [jsai-admin@gsaa.net](mailto:jsai-admin@gsaa.net). Thank you!

ICC000008

Daniel Coco

From: Daniel Coco <dnccoco2@icloud.com>  
Sent: Thursday, March 10, 2016 4:01 PM  
To: 'Kathrina O. Bayson'  
Cc: 'Pamela Coco' <psc@tfccomputers.com>  
Subject: FOIA PB 010-2016 08 of Materials

Hello Arel Katherine.

Under the Freedom of Information Act, Technologies for Tomorrow Inc. request the bill of materials for the lowest bidder under section 2.2.11 and 0.7.1. The bidder shall provide the complete description and specification of the WLAN equipment to be furnished in its Technical Proposal.

We do not require brochures for bill of materials, only the part numbers and descriptions for products and warranty support care services.

With regard,  
Daniel Coco  
Vice President of Sales  
Technologies for Tomorrow Inc.

From: Kathrina O. Bayson [mailto:kobayson@gdoe.net]  
Sent: Thursday, March 10, 2016 11:39 AM  
To: Daniel Coco <dnccoco2@icloud.com>  
Cc: Pamela Coco <psc@tfccomputers.com>; Elizabeth Dearlen <eld@tfccomputers.com>  
Subject Re: FOIA PB 010-2016 08 Form

Hi Daniel,

I have signed with our Legal Counsel. They usually provide it within four business days. You can also follow up with them at [legal.admin@gdoe.net](mailto:legal.admin@gdoe.net).

Also, are you requesting another FOIA for the bill of materials? If so, could you kindly send a separate email with the request and I can forward it to our Legal department.

Regards,

**Kathrina Bayson**  
Bever Supervisor II  
Office of Supply Management  
Oman Department of Education  
500 Maxiner Avenue, Barrigada, GU 96913-1608  
Tel: 671-300-1582 | Fax: 671-472-5001  
Email: [kobayson@gdoe.net](mailto:kobayson@gdoe.net)

Visit our website at [www.gdoe.net/recruitment](http://www.gdoe.net/recruitment)

CONFIDENTIALITY NOTICE: This email is from the Oman Department of Education. Any files transmitted with it are confidential and intended solely for the use of the individual or entity to which they are addressed. If you are not the named recipient, you may not review, copy, or distribute this message if you have received

ICC000009

Daniel Coco

From: Emmanuel O. Lamb <olamb@gdoe.net>  
Sent: Friday, March 18, 2016 8:39 AM  
To: Daniel Coco  
Subject: Re: FOIA Request dated March 10, 2016 re: GOOE IFS 010-2016  
Attachments: 031716 FOIA Response Document to Daniel Coco re IFS 010-2016.pdf

Mr. Coco,

Per your request, please see attached document in response to your FOIA Request dated March 17, 2016. Please acknowledge receipt via email to [jeanl-admin@doe.ny.gov](mailto:jeanl-admin@doe.ny.gov). Thank you!

On Thu, Mar 17, 2016 at 6:57 PM, Daniel Coco <[dancoco@doe.ny.gov](mailto:dancoco@doe.ny.gov)> wrote:

Signed letter. Look forward to receiving the documents electronically.

With regard,

Daniel Coco

Vice President of Sales

Technologies for Tomorrow Inc.

From: Emmanuel O. Lamb <[olamb@gdoe.net](mailto:olamb@gdoe.net)>  
Sent: Thursday, March 17, 2016 1:55 PM  
To: Daniel Coco <[dancoco@doe.ny.gov](mailto:dancoco@doe.ny.gov)>  
Subject: FOIA Request dated March 10, 2016 re: GOOE IFS 010-2016

Mr. Coco,

Please see attached letter dated March 1

7

, 2016. Please acknowledge receipt via email to [jeanl-admin@doe.ny.gov](mailto:jeanl-admin@doe.ny.gov). Thank you!



This timely protest of GSA's actions in this procurement is based upon the following issues that have been determined after review of the Docomo Pacific Price Bid form, Docomo Pacific Bill of Materials, obtained under the Freedom of Information act. Docomo Pacific does not meet the minimum IFB requirements and response has multiple deficiencies listed in our protest under:

**Section A: IFB 010-2016 Docomo Pacific Bid Deficiencies**

It is clear from review of the documents obtained under the Freedom of Information Act Docomo Pacific lacks the experience and knowledge with the current wireless infrastructure installed throughout the GDOE school system. Docomo Pacific has bid a non-compliant and technically deficient proposal. (TFT) will outline these deficiencies and demonstrate why Docomo Pacific Bid should be disqualified with exhibits B through C.1 under:

**Section B: Attachments of Evidence Exhibits**

Docomo Pacific bid should be disqualified and awarded to the lowest responsible bidder, Technologies for Tomorrow Inc.

Technologies for Tomorrow Inc. as the sole provider of Brocade hardware and software currently in place within the GDOE school system for the wireless infrastructure, understands technically what is required and necessary to comply with the additional purchase and installation of new Brocade switches, software licenses required, and Aruba AP's. Details on the installed hardware and software configurations at GDOE and quantities are not listed in IFB 010-2016 and would only be available to the bidders under the Freedom of Information Act.

Technologies for Tomorrow Inc. in depth knowledge was obtained from our successful installation of the Phase I and Phase II, GDOE wireless infrastructure, under Team Carousel. Our company experience and detailed knowledge of the exact hardware and software configurations is why TFT was rated number one technically by GDOE.

## **Section A: IFB 010-2016 Docomo Pacific Bid Deficiencies**

**IT IS CLEAR DOCOMO PACIFIC BID FAILED TO MEET MANDATORY HARDWARE AND SOFTWARE REQUIREMENTS AND TECHNICALLY WILL NOT WORK AS PROPOSED. 5 G.C.A. § 5211(g) states that "a responsive bid is one that conforms in all material aspects to the Governments bid specifications".**

**THE DOCOMO PACIFIC BID MUST BE REJECTED AS NON-RESPONSIVE and awarded to the lowest responsible bid which is Technologies for Tomorrow Inc.**

We have included the required documents and evidence to support this claim and will demonstrate where and why Docomo Pacific proposal is non-compliant.

The bid requirements were clear that bidders were required to provide a turnkey solution for each school listed in IFB 010-2016 and a complete Bill of Material and descriptions for all components and services to meet the minimum requirements.

Per the Freedom of Information Act, documents provided to Technologies for Tomorrow Inc on March, 18, 2016, Docomo Pacific Bill of Materials, demonstrate the failure by Docomo Pacific to include in their Bill of Materials:

- ✓ Requirement to provide Brocade Management Software (BNA), (Exhibit B.1) BNA Software included in Section Attachments of Evidence Exhibits.
- ✓ Required hardware and cables to meet the requirement for Brocade stacking, (See Exhibits B through B.5 included in Section: Attachments of Evidence Exhibits)
- ✓ ClearPass hardware appliance required to support the ClearPass licensing included in Docomo Pacific proposal and BOM. (Exhibit C.1 ClearPass Hardware Appliance included in Section: Attachments of Evidence Exhibits)

**Docomo Pacific Bid is technically deficient and invalid and should have resulted in the rejection of the Docomo Pacific bid for lack of Bidder to comply with the bid specifications and requirements.**

**In addition, without quantities of the major components as a minimum in Docomo Pacific Bill of Materials would preclude the evaluators from ensuring the Bill of Materials met the minimum technical specifications of IFB 010-2016.**

- ✓ **The number of Brocade 6450 PoE switches.**
- ✓ **Number of Brocade Optics.**
- ✓ **Number of Stacking Cables.**
- ✓ **Aruba Airwave licensing.**

**Deficiency Number 1: No Brocade Network Management Software in Docomo Pacific Bill of Materials**

Technologies for Tomorrow Inc. installed and licensed on the GDOE Brocade Management Server, extra BNA licenses during Phase 2 installation of the wireless Aruba infrastructure beginning in July 2015 under team Carousel. This information is confidential and not available to Docomo Pacific or any other competitor unless obtained under the Freedom of Information Act. All vendors bidding this IFB with the exception of TFT would be required to bid Brocade Network Management Licenses without this knowledge. This confidential data along with our complete knowledge of the wireless infrastructure at GDOE installed by Technologies for Tomorrow provides the lowest responsible bid under IFB 010-2016

IFB 010-2016 Section D.5.2 - Requires the following:

- D.5.2. Software elements to be furnish by the installation vendor.
- D.5.2.1. Brocade Network Advisor (BNA) or other equivalent manufacture's licensing required to support added Access Point Edge switches.
- D.5.2.1.1. (Addendum 2) Provide additional device licensing for added switches to the BNA or equivalent to allow monitoring, managing and configuring during and after the contracted WLAN expansion.

**Docomo Pacific's Response Section 7.1- The Docomo Bill of Materials states the following: Exhibit A.8 031716 FOIA Response Document to Daniel Coco re IFB 010-2016 Docomo BOM**

- |   |
|---|
| 1: ClearPass Licensing for New AP                         |
| 2: Airwave Wireless Management Suite licensing for NEW AP |
| 3 ClearPass Licensing for NEW AP                          |

**Docomo Pacific's response is technically Non-Compliant.**

**Brocade Network Advisor not provided as required in D.5.2, D.5.2.1, D.5.2.1.1**

**Section D.7.1, Docomo Pacific does not provide the required "Brocade Network Advisor (BNA) or other equivalent manufacturer's licensing required to support added Access Point Edge switches" in their Bill of Materials as required by D.5.2.1 and D.5.2.1.1. Docomo Pacific should have included the necessary licenses for the new Brocade switches since they would otherwise not be able to demonstrate a working solution based on their knowledge at the time of bid submission.**

**Brocade Part Number- BR-NTWADV-IP-100 IP ADD ON LICENSE 100 DEVICES Price \$2200**

**Deficiency Number 2: No Stacking Cables in Docomo Pacific Bill of Materials.**

**IFB 010-2016 Section D.5.1.3, D.5.3.1.8., D.7.4 and Addendum 2 - Requires the following:**

- **D.5.1.3. Power over Ethernet edge switches for WAPs.**
- **D.5.1.3.1. Brocade 1CX6540-24P switch, 24 port, 1GB, POE+ 390W, 2x1GSFP or approved equivalent or better.**
- **D.5.1.3.2. (Addendum 2) Changed from two (2) SFP Multi Mode Uplink to two (2) SFP required for stacking and must be compatible and approved by switch manufacture to avoid any issue on warranty and/or support.**
- **D.5.3.1.8. Connect the uplink port on the switch to the designated port on an existing switch in the IDE, as designated by GDOE FSAIS.**
- **D.7.4. The Bidder must demonstrate that the proposed layer 2 edge switch is stackable and fully functional with the existing layer 2 switches in the network rack.**

**IFB 010-2016 Addendum 2, Question 3 and 4 reads:**

**Addendum 2 – (TFT) Question 3:** Is it required that WLAN POE switches are able to stack with existing LAN infrastructure to provide unified management?

**GDOE ANSWER: YES**

**Addendum 2 - TFT Question 4:** Will a 1GbE connection between the WLAN POE switch and LAN switch meet requirements?

**GDOE ANSWER: NO. GDOE requires 10G connection between LAN switch and WLAN PoE switch.**

## **Docomo Pacific Bid is Technically Non-Compliant**

Docomo Pacific Bill of Materials, provided to Technologies for Tomorrow Inc under the Freedom of Information act on March 17,2016, shows Docomo Pacific has no valid parts listed in their BOM to physically connect the switches into the stack. See Exhibits B through B.5 in Section: Attachments of Evidence Exhibits

<b>Brocade ICX6540-24P Switch,24 port,1GB, PoE+390W,2X1GSFP</b>
<b>PoE Edge Switch 3 Yr. Replacement Warranty</b>
<b>PoE Edge Switch Manufacture Care Support Service</b>
<b>Multimode SFP for Brocade ICX6540-24P</b>
<b>Fiber Patch LC to SC; OM3 multimode,50/125 laser optimized</b>

Docomo Pacific is neither able to meet the requirements as stated in D.5.1.3.2 (Addendum 2) "Two SFP required for stacking..." nor the requirement to be "able to stack with existing LAN infrastructure to provide unified management" as stated in GDOE's response to Addendum 2 TFT Question #3.

Docomo Pacific use of Multimode SFP's requires the following part numbers for the configuration to work as required by IFB 010-2016

- ✓ Quantity (70) Brocade Multi Mode 10G Optic part number (10G-SFPP-USR) Price: \$675.00 each
- ✓ Quantity (70) 3 Meter Fiber, 10 Gigabit Multimode 50/125, Duplex, LC/LC Price: \$31.00 each

Docomo Pacific provides only LC-SC cables which are incompatible with the 10G Multimode SFP (see Exhibits B.2 through B.5). Brocade Optics can neither be used for stacking nor up linking between Brocade LAN and WLAN PoE switches. LC-LC Cables are mandatory because the IDF Switch designated in D.5.3.1.8. is a Brocade switch and does not support SC connectors. See Exhibit B.3 Stacking Cable Requirement Letter Brocade

**Docomo Pacific has no valid parts listed in their BOM to physically connect the switches into the stack.**

**Deficiency Number 3: No ClearPass Hardware Appliance Included in Docomo Pacific Bill of Materials.**

Docomo Pacific has included in their proposal ClearPass User Endpoint licensing in their Bill of Materials.

**Docomo Pacific Bid Inclusion of Clear Pass User End Point Licensing cannot be added to the existing installed GDOE ClearPass server.**

Without the following components, which are not included in Docomo Pacific Bill of Materials, makes the ClearPass User End Point Licensing configuration technically invalid. (Exhibit C.1 Aruba DS ClearPass Data Sheet)

- ✓ Quantity 1 (CP-HW-500) Aruba ClearPass Policy Manager 500 HW Appliance - RADIUS/TACACS+ server with advanced policy control for up to 500 unique endpoints. Includes 25 endpoint Enterprise License.
- ✓ Price \$10,000

**Technologies for Tomorrow Inc. response section D.5.2.3.1**

**Basis: (No User Endpoints Specified in IFB 010-2016)**

**D.5.2.3.1. Provide additional licensing for Authorization and Network Access for the specified number of User End Points.**

**There are no ClearPass Authorization and Network Access licenses specified for the number of User End Points in IFB 010-2016.** Team TFT will comply with this requirement.

**D.5.2.3.2. Provide additional licensing for Authorization and Network Access for the specified number of User End Points.**

**There are no ClearPass Authorization and Network Access licenses specified for the number of User End Points in IFB 010-2016.** Team TFT will comply with this requirement.

## **TECHNICAL NOTES:**

**Question: Are LC and SC connectors interchangeable?**

**Answer: No.**

**LC Fiber Plugs must be inserted into LC Jacks/Receptacles**

**SC Fiber Plugs must be inserted into SC Jacks/Receptacles**

**LC Fiber Plugs do NOT fit properly into SC Jacks/Receptacles**

**SC Fiber Plugs do NOT fit properly into LC Jacks/Receptacles**

**Question: What does an LC-LC or LC-SC Fiber mean?**

**Answer: This is a "shorthand" designation for a fiber cable (available in various lengths) a particular type of plug at each end.**

**An LC-LC Fiber Cable would have an LC Plug at one end, and another LC plug at the opposite end of the fiber cable.**

**An LC-SC Fiber Cable would have an LC Plug at one end, and instead a SC plug at the opposite end of the fiber cable.**

**Question: Is it possible to have an SFP with an SC Receptacle?**

**Answer: Since an SC Receptacle is larger than the physical space available to an SFP, it is not available from Brocade as part of a supported stacking configuration.**

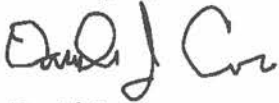


## **Section: Attachments of Evidence Exhibits**

- 1: (1) Exhibit A.1 Email from Kathrina O Bayson IFB 010-2016 Bid Status and Proprietary Data Form Results**
- 2: (2) Exhibit A.2 Email to Kathrina O. Bayson March 4 2016 requesting FOIA of Docomo Pacific Price Bid Form**
- 3: (3) Exhibit A.3 Email from Emmajean O. Lamb FOIA Re IFB 010-2016 031116 FOIA Response Documents March 4 Daniel Coco re IFB 010-2016 Price Bid Form**
- 4: (4) Exhibit A.4 Email to Kathrina O Bayson for FOIA of Docomo Pacific Bill of Materials Dated March 10 2016**
- 5: (5) Exhibit A.5 Email from Emmajean O. Lamb FOIA Re IFB 010-2016 Response Document**
- 6: (6) Exhibit A.6 FOIA Request Response to Daniel Coco re\_ IFB 010-2016001 Dated March 18 Docomo Proposal**
- 7: (7) Exhibit A.7 Email from Emmajaen O. Lamb Re FOIA IFB 010-2016 FOIA Request dated March 24, 2016 re GDOE IFB 010-2016 Bid Price Form Request**
- 8: (8) Exhibit A.8 031716 FOIA Response Document to Daniel Coco re IFB 010-2016 Docomo BOM**
- 9: (9) Exhibit B IFB 010-2016 Addendum 2**
- 10: (10) Exhibit B.1 Brocade Network Advisor Software Required**
- 11: (11) Exhibit B.2 Stacking Cable Requirement Diagrams**
- 12: (12) Exhibit B.3 Stacking Cable Requirement Letter Brocade**
- 13: (13) Exhibit B.4 10gbps-usr-sfp-optical-transceiver-ds with LC Marking**
- 14: (14) Exhibit B.5 Brocade\_ICX\_6430-6450\_Switch with LC Marking**
- 15: (15) Exhibit C.1 Aruba DS ClearPass Data Sheet**

Technologies for Tomorrow Inc. request that Docomo Pacific Bid be thrown out due to being non-compliant with the minimum bid specifications of IFB 010-2016 and awarded to the lowest responsible bidder, Technologies for Tomorrow Inc.

With Regard,

A handwritten signature in black ink, appearing to read "Daniel Coco". The signature is stylized and written in a cursive-like font.

Daniel Coco

Vice President of Sales

Technologies for Tomorrow Inc.

Date: March, 25, 2016



Technologies for Tomorrow, Inc.  
6235 North Davis Highway  
Suite 117  
Pensacola, Florida USA 32504  
Telephone: 850-478-5222 Fax: 850-478-1881



March 28, 2016

Ms. Carmen T. Taitano  
Supply Management Administrator  
CC: Kathrina Bayson  
Buyer Supervisor II  
Office of Supply Management  
Guam Department of Education  
500 Mariner Avenue, Barrigada, GU 96913-1608

Subject: Protest Award Additional Deficiencies for IFB 010-2016 to Docomo Pacific

Dear Ms. Taitano,

Please see additional information and deficiencies to support our protest letter sent on March 25<sup>th</sup> 2016.

On March 28, 2016 GSA provided (TFT) with a copy of the Docomo Pacific Bid Proposal, available only by obtaining the documentation under the Freedom of Information Act. These facts were not known to Technologies for Tomorrow Inc. until documentation was provided to (TFT) under the Freedom of Information Act on March 28, 2016, clearly making our protest conform within 14 days after the protestor knows or should have known of the facts giving rise thereto.

After review of the Docomo Pacific proposal obtained under the Freedom of Information Act on March 28<sup>th</sup> additional deficiencies were uncovered.

- ✓ On page 122 of the Docomo Pacific proposal Docomo Pacific states: Brocade ICX6540-24P switch, 24 port, 1GB, PoE+ 390W, 2x 1GSFP or approved equivalent or better with two SFP multi-mode fiber uplinks will be supplied by Docomo Pacific.

Fact: Does not match specified hardware requirement as stated in Addendum 2 Attachment A, Page 7, Section D.5-Hardware Details, Subsection D.5.1.3.1

Brocade ICX6450-24P, 24 port, 1GB, PoE+ 390W, 2x1Gbe SFP+ and 2x10Gbe SFP+ uplink/stacking ports (1 Gbe SFP+ upgradable to 10Gbe) or approved equivalent or better.

**IFB Requirement:**

- ✓ D.5.1.3.2. (Addendum 2) Changed from two (2) SFP Multi Mode Uplink to two (2) SFP required for stacking and must be compatible and approved by switch manufacture to avoid any issue on warranty and/or support.

**Fact:** Docomo Pacific does not meet this requirement as stated in our Exhibit B.2 through B.5

Deficiency Number Four: No specifications provided on parts list for any of the equipment provided.

**IFB Requirement:**

- ✓ D.7.1. The Bidder shall provide the complete description and specification of the WLAN equipment to be furnished in its Technical Proposal.

**Fact:** Docomo Pacific does not include the description and specification for any of the components listed in their parts list. It is not possible to know the following without the specification:

- 1- Multi-mode SFP manufacturer, 1GB or 10GB, 10GB stacking cables
- 2- Clear Pass Licensing provided, Exhibit C.1
- 3- Warranty support services provided for Brocade and Aruba are included? See Exhibit D.1 Brocade Support Options

It appears Docomo Pacific just copied the requirement and said they would comply.

Original copy of our protest will follow by express mail with tracking number provided.

With Regard,

Daniel Coco

Vice President of Sales

Technologies for Tomorrow Inc.

# EXHIBIT C



**DEPARTMENT OF EDUCATION  
OFFICE OF SUPPLY MANAGEMENT**  
[www.gdoe.net/procurement](http://www.gdoe.net/procurement)  
 500 Mariner Avenue  
 A-Building, Suite A-13  
 Barrigada, Guam 96913  
 Telephone: (671) 475-0438/Fax: (671) 472-5001  
 Email: [procurement@gdoe.net](mailto:procurement@gdoe.net)



JON J.P. FERNANDEZ  
Superintendent of Education

CARMEN T. TAITANO  
Supply Management Administrator

April 22, 2016

Technologies For Tomorrow Inc.  
6235 North Davis Highway  
Suite 117  
Pensacola, Florida 32504  
Tel: (850) 478-5222  
Fax: (850) 478-1881  
Email: [dancoco2@lcloud.com](mailto:dancoco2@lcloud.com)

Attn: Daniel Coco  
Vice President of Sales

Subject: Response to Protest Letter dated March 26, 2016 and March 28, 2016

Reference: E-Rate Internal Connections – Wireless Local Area Network (WLAN) Installation Services  
FORMAL BID: GDOE IFB 010-2016 (Multi-Step)

Dear Mr. Coco,

This is a written response to your letter of protest dated March 26, 2016 with additional findings submitted on March 28, 2016 regarding Guam Department of Education ("GDOE") Invitation for Bid No. 010-2016 ("IFB") for E-Rate Internal Connections – Wireless Local Area Network ("WLAN") Installation Services.

GDOE has reviewed your protest and has determined that there is no merit for its basis, and therefore your protest is DENIED in its entirety for the reasons discussed below:

**A. Protest Letter dated March 26, 2016**

1. Technologies For Tomorrow Inc. ("TFT"), asserts deficiencies in Docomo Pacific's Bid for IFB 010-2016:
  - "Docomo Pacific bid failed to meet mandatory hardware and software requirements and technically will not work as proposed."
  - "Docomo Pacific Bill of Materials, demonstrates the failure by Docomo to include in their Bill of Materials:
    - Requirement to provide Brocade Management Software ("BNA"), (Exhibit B.1) BNA Software included in Section Attachment to include in their Bill of Materials:
    - Required hardware and cables to meet the requirement for Brocade stacking. (See Exhibits B through B.5 included in Section: Attachment of Evidence Exhibits)
    - ClearPass hardware appliance required to support the ClearPass licensing included in Docomo proposal and BOM. (Exhibit C.1 ClearPass Hardware Appliance included in Section: Attachment of Evidence Exhibits)"
  - "Without quantities of the major components as a minimum in Docomo Pacific Bill of Materials would preclude the evaluators from ensuring the Bill of Materials met the minimum technical specifications of IFB 010-2016.
    - The number of Brocade 6450 PoE switches.
    - Number of Brocade Optics.
    - Number of Stacking Cables.
    - Aruba Airwave licensing."

**GDOE Response:**

IFB 010-2016 bid Section D.7.1. requires the bidder to provide complete description and specification of the WLAN equipment to be furnished in its technical proposal. The quantity of the required WLAN equipment is provided in the bid's

School's Wireless Network Installation Specification ("SWNIS") and not a requirement to be provided in bid's Section D.7.1. Section D.7.1 intent is to require the Bidder to provide WLAN equipment description and specification that will be installed in GDOE WLAN environment.

Section D.7.1 will provide GDOE with information if the equipment being proposed by the Bidder is of the same make and model or an equivalent to the WLAN equipment currently in GDOE WLAN infrastructure. Other sections and sub-sections in the bid provided the requirements and elements that are necessary to support the Bidder's proposed WLAN equipment.

The Bill of Materials is a reoccurring point of contention by Technologies For Tomorrow throughout their protest. However, a Billing of Materials ("BOM") was NOT A REQUIREMENT for prospective bidders for IFB 010-2016. The BOM was not a requirement in Section D.7.1 nor any other sections or sub-sections in the bid. The supplies, materials, software, licensing, warranty, manufacture support, and other elements required to support and furnish for the proposed WLAN equipment are provided in the bid's scope of service sections and sub-sections.

Docomo Pacific listed the equipment description and specification that will be provided to GDOE. The equipment listed are: 1) Aruba Instant IAP-225 Wireless Access Point 802.11 n/ac 3x3: dual radio US; and 2) Brocade ICX6540-24P Switch, 24 port, 1GB, POE + 390W, 2x1GSP.

GDOE acknowledges that the model number ICX6540-24P initially listed in the bid and indicated by Docomo Pacific in its equipment listing is not offered by Brocade and that the model number should instead be ICX6450-24P. The model number is corrected in the Bid's Addendum 2 and as acknowledged by Docomo Pacific.

Technology for Tomorrow identified this mistake in Docomo's bid. However, the same mistake was made by TFT. The model number describe as "Brocade 6540 – 24 Port POE Switch" in Page 51 in TFT's Bid is not offered by Brocade and that the model should be 6450-24P as noted in Bid's Addendum 2 and as acknowledged by TFT.

Docomo Pacific submitted their response in the Bid's Sections and Sub-Sections to provide and furnish elements that supports the equipment listed.

Docomo Pacific submitted the following bid response that satisfied the bid requirements:

- Docomo Pacific response to Section D.1. "Docomo Pacific will follow all specification and requirements as based on the SWNIS for each school"
- Docomo Pacific response to Section D.1.2. through D.1.2.12. "All items on SWNIS will be completed as stated."
- Docomo Pacific response to Section D.2. HARDWARE, SOFTWARE AND INSTALLATION; Sub-Section D.2.1.1 through D.2.1.6. "Hardware elements will be provided with 3 years replacement warranty and Manufacturer Care Support by Docomo Pacific."
- Docomo Pacific response to Section D.2.2. "Software elements will be delivered with all required licensing".
- Docomo Pacific response to Section D.2.3. "Docomo Pacific will provide installation as dictated by requirements as has a history of successful deployments on a enterprise level".
- Docomo Pacific response to Section D.3.3. "Experienced Docomo Pacific technicians will configure all hardware and software items and work with GDOE to ensure connectivity and requirements are achieved."
- Docomo Pacific response to Section D.4.5. "All WLAN equipment and cabling will be furnished by Docomo Pacific".
- Docomo Pacific response to Section D.4.8. "All required supplies and materials will be furnished by Docomo Pacific to complete installation at each location".
- Docomo Pacific response to Section D.7.2. "Docomo Pacific will be providing preferred GDOE equipment to ensure there is no incompatibility with the GDOE wireless network environment."
- Docomo Pacific response to Section D.7.3. "Docomo Pacific will be providing the same equipment currently in place and will not be providing "equivalent equipment"."
- Docomo Pacific response to Section D.7.4. "Docomo Pacific will be providing the same layer 2 edge switch as current equipment in place."
- Docomo Pacific response to Section D.7.6. "Docomo Pacific will be using the same make and model equipment of GDOE's preferred equipment."
- Docomo Pacific response to Section D.7.7. "Docomo Pacific will not be providing equivalent equipment, rather, all equipment listed by GDOE will be provided to ensure there are no incompatibilities with GDOE's network."
- Docomo Pacific acknowledge Addendum 2 of IFB 010 2016.

- o In acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged the correction of Brocade layer 2 edge switch from ICX6540-24P to ICX6450-24P.
- o In acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged the revision from two SPF for multi-mode fiber uplink to two SFP required for stacking and must be compatible and approved by switch manufacture to avoid any issue on warranty and/or support.
- o In acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged the revision From: Provide additional device licensing for added switches to the BNA or equivalent to allow monitoring of switches added during and after the contracted WLAN expansion; To: Provide additional device licensing for added switches to the BNA or equivalent to allow monitoring, managing and configuring during and after the contracted WLAN expansion.
- o In acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged GDOE response to all Bidder's questions.

2. Technologies For Tomorrow states under Deficiency Number 1: No Brocade Network Management Software in Docomo Pacific Bill of Materials;

- "Technologies for Tomorrow Inc. installed and licensed on the GDOE Brocade Management Server, extra BNA licenses during Phase 2 installation of the wireless Aruba infrastructure beginning in July 2015 under team Carousel. This information is confidential and not available to Docomo Pacific or any other competitor unless obtained under the Freedom of Information Act. All vendors bidding this IFB with the exception of TFT would be required to bid Brocade Network Management Licenses without this knowledge."

**GDOE Response:**

Docomo Pacific provided the following response:

- Docomo Pacific response to Sub-Section D.2.2 through Sub-Section D.2.2.3 "Software elements will be delivered with all required licensing."
- Docomo Pacific response to Sub-Section D.5.2.1 and D.5.2.1.1 "Brocade Network Advisor (BNA) or other equivalent manufacture's licensing will be provided for installed equipment. "

The licensing information for the referenced installation service is not considered confidential and was not designated as confidential in the proposal submission of Carousel Industries for the referenced service. GDOE did not make any exceptions for Technologies For Tomorrow.

3. Technologies For Tomorrow Indicated in their protest, Section D.7.1, Docomo Pacific does not provide the required Brocade Network Advisor (BNA) or other equivalent manufacturer's licensing required to support added Access Point Edge Switches in their Bill of Materials as required by D.5.2.1 and D.5.2.1.1. Docomo Pacific should have included the necessary licenses for the new brocade switches since they would otherwise not be able to demonstrate a working solution based on their knowledge at the time of bid submission."

**GDOE Response:**

Docomo Pacific's response to Sub-Section D.5.2.1 and D.5.2.1.1 states "Brocade Network Advisor (BNA) or other equivalent manufacture's licensing will be provided for installed equipment."

4. Under Deficiency Number 2: No Stacking Cables in Docomo Pacific Bill of Materials, Technologies For Tomorrow states the following:

- "Docomo Pacific Bid is Technically Non-Compliant"
- "Docomo Pacific Bill of Materials, provided to Technologies for Tomorrow Inc under the Freedom of Information act on March 17,2016, shows Docomo Pacific has no valid parts listed in their BOM to physically connect the switches into the stack. See Exhibits B through B.5 in Section: Attachments of Evidence Exhibits"



Page 4 of 5

- "Docomo Pacific is neither able to meet the requirements as stated in D.5.1.3.2 (Addendum 2) "Two SFP required for stacking..." nor the requirement to be "able to stack with existing LAN infrastructure to provide unified management" as stated in GDOE's response to Addendum 2 TFT Question #3."
- "Docomo Pacific has no valid parts listed in their BOM to physically connect the switches into the stack."

**GDOE Response:**

Docomo Pacific acknowledged Addendum No. 2 of IFB 010 2016. In acknowledging the Bid's Addendum No. 2, Docomo Pacific acknowledged the revision from two SPF for multi-mode fiber uplink to two SFP required for stacking and must be compatible and approved by switch manufacture to avoid any issue on warranty and/or support.

5. Technologies For Tomorrow alleges, under Deficiency Number 3: No ClearPass Hardware Appliance included in Docomo Pacific Bill of Materials, "Docomo Pacific Bid inclusion of Clear Pass User End Point Licensing cannot be added to the existing installed GDOE ClearPass server. Without the following components, which are not included in Docomo Pacific Bill of Materials, makes the Clearpass User End Point Licensing Configuration technically invalid."

**GDOE Response:**

A Bill of Materials was not a requirement of IFB010-2016. Docomo's response to Section D.5.2.3.1 and D.5.2.3.2 states, "Clear pass licensing will be provided accordingly for Authorization and Network Access for the specified number of user end points."

**B. Protest Letter dated March 28, 2016**

6. Technologies For Tomorrow claimed additional deficiencies on page 122 of the Docomo Pacific's proposal: Brocade ICX6540-24P switch, 24 port, 1GB, PoE+ 390W, 2x 1GSFP approved equivalent or better with two SFP multi-mode fiber uplinks will be supplied by Docomo Pacific. "FACT: Does not match specified hardware requirements as stated in Addendum 2 Attachment A, Page 7, Section D.5 Hardware Details, Subsection D.5.1.3.1."

**GDOE Response:**

- Docomo Pacific acknowledge Addendum 2 of IFB 010 2016. In acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged the correction of Brocade layer 2 edge switch from ICX6540-24P to ICX6450-24P, and therefore Docomo affirms their ability to meet the requirements included.
- Docomo Pacific response to Section D.7.3 states "Docomo Pacific will be providing the same equipment currently in place and will not be providing "equivalent equipment"."
- Docomo Pacific response to Section D.7.4 states "Docomo Pacific will be providing the same layer 2 edge switch as current equipment in place."
- Docomo Pacific response to Section D.7.6 states "Docomo Pacific will be using the same make and model equipment of GDOE's preferred equipment."
- Docomo Pacific response to Section D.7.7 states "Docomo Pacific will not be providing equivalent equipment, rather, all equipment listed by GDOE will be provided to ensure there are no incompatibilities with GDOE's network."

7. TFT alleges that based on "IFB Requirements: D.5.1.3.2 (Addendum 2) Change from two (2) SFP required for stacking and must be compatible and approved by switch manufacture to avoid any issues on warranty and/or support. According to TFT, Docomo Pacific does not meet this requirement as stated in our Exhibit B.2 through B.5."

**GDOE Response:**

Docomo Pacific acknowledged Addendum 2 of IFB 010 2016. In acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged the revision from two SPF for multi-mode fiber uplink to two SFP required for stacking and must be compatible and approved by switch manufacture to avoid any issue on warranty and/or support. Also, in acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged GDOE response to all Bidders' questions.

8. Technologies For Tomorrow Indicated in their letter "Deficiency Number Four: No specifications provided on parts list for any of the equipment provided. IFB Requirement: D.7.1. The Bidder shall provide the complete description and specification of the WLAN equipment to be furnished in its Technical Proposal. TFT claims Docomo Pacific does not include the description and specification for any of the components listed in their parts lists, and that it is not possible to know the following without the specification:

- 1. Multi-Mode SFP manufacture, 1GB or 10GB, 10GB stacking cables
- 2. Clear Pass Licensing provided, Exhibit C.1
- 3. Warranty support services provided for Brocade and Aruba are included? See Exhibit D.1 Brocade Support Options"

**GDOE Response:**

- Docomo Pacific acknowledge Addendum 2 of IFB 010 2016.
  - i. In acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged the revision from two SPF for multi-mode fiber uplink to two SFP required for stacking and must be compatible and approved by switch manufacture to avoid any issue on warranty and/or support.
  - ii. In acknowledging the Bid's Addendum 2, Docomo Pacific acknowledged the revision From: Provide additional device licensing for added switches to the BNA or equivalent to allow monitoring of switches added during and after the contracted WLAN expansion; To: Provide additional device licensing for added switches to the BNA or equivalent to allow monitoring, managing and configuring during and after the contracted WLAN expansion.
- Docomo Pacific response to Section 5.2.3 through Sub-Section D.5.2.3.2. "Clear Pass licensing will be provided accordingly for Authorization and Network Access for the specified number of user end points."
- Docomo Pacific response to Section D.2. HARDWARE, SOFTWARE AND INSTALLATION; Sub-Section D.2.1.1 through D.2.1.6. "Hardware elements will be provided with 3 years replacement warranty and Manufacturer Care Support by Docomo Pacific. "
- Docomo Pacific response to Section D.5 through Sub-Section D.5.1.1.5. "All hardware elements will be furnished by Docomo Pacific to meet all requirements listed. "
- Docomo Pacific response to Section D.5.2. through Sub-Section D.5.2.1.1. "Brocade Network (BNA) or other equivalent manufacturing licensing will be provided for installed equipment."
- Docomo Pacific response to Section D.5.2.2 and D.5.2.2.1. " Airwave Wireless Management Suite licensing will be provided as required and additional WAP licensing for the additional hardware will be provided."
- The Intent of Sub-Section D.7.1 is for GDOE to determine if the WLAN equipment is of the same make and model or equivalent to the WLAN equipment in the current GDOE WLAN infrastructure. Docomo Pacific responded that they will provide and comply with the bid's Sections and Sub-Sections requirements and all elements.

Given the facts and reasons stated above, GDOE hereby denies your protest in its entirety. Pursuant to 5 GCA §5425(e) you are hereby advised that you have a right to administrative and judicial review as allowed by the Guam Procurement Law. You may appeal this decision to the Guam Office of Public Accountability within fifteen (15) days.

**Acknowledgement Receipt**


\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Time

Sincerely,



CARMEN T. TAITANO  
Supply Management Administrator

# EXHIBIT D

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Burton, Adam (Orange County, CA/Hawaii SLED TM)  
[mailto:adam.burton@hpe.com]  
Sent: Wednesday, May 04, 2016 12:21 AM  
To: Daniel Coco <dancoco2@icloud.com>  
Cc: Benny Mateo <bmateo@nxttechsystems.com>; Jeff Chan <eljeffo@x2o.net>  
Subject: RE: Quote for ClearPass Licensing

Clearpass licensing is not sold, or supported, as an Access Points (APs) quantity deployment model. The attached 031716 FOIA Clearpass software bid request portion is not sound and will result in a non-working solution.

Adam Burton  
Territory Manager | Orange County California/Hawaii SLED  
W: (949)-322-2692 M: (480) 250-5837 F: (949)272-3409  
24916 Singingwoods DR. Lake Forest, CA 92630  
WWW.ARUBANETWORKS.COM | FOLLOW US | Twitter | LinkedIn

-----Original Message-----

From: Daniel Coco [mailto:dancoco2@icloud.com]  
Sent: Tuesday, May 03, 2016 7:55 AM  
To: Burton, Adam (Orange County, CA/Hawaii SLED TM) <adam.burton@hpe.com>  
Cc: Benny Mateo <bmateo@nxttechsystems.com>; Jeff Chan <eljeffo@x2o.net>  
Subject: Quote for ClearPass Licensing

Adam good morning! I have an urgent request for ClearPass licensing. Please see attached description and specifications for licensing. Can you please provide me a quote for new AP clear pass licensing based on the attached detailed specifications? Please urgency of response is appreciated.

Daniel Coco  
Vice President of Sales

> Please the quote must be accurate for me to comply with the bid specifications.

termination must be adhered to.

D.6.3.11. All supplies and materials required to complete the cable installation shall be furnishing by the vendor.

In rooms with no available Ethernet outlet and network cable, Docomo Pacific will install Cat 5e or better and homerun from the WAP location to the nearest IDF or MDF and meet all requirements listed above

D.7. FURNISH WLAN EQUIPMENT

D.7.1. The Bidder shall provide the complete description and specification of the WLAN equipment to be furnished in its Technical Proposal.

Docomo Pacific will provide the following WLAN equipment to GDOE:

HARDWARE

Aruba Instant IAP-225 Wireless Access Point 802.11n/ac 3x3:3 dual radio US
AP 3 Yr Replacement Warranty
AP Manufacture Care Support Service
AP Mounting Kits
Brocade ICX6540-24P switch, 24 port, 1GB, PoE +390W, 2x1G5FP
POE Edge Switch 3 Yr Replacement Warranty
POE Edge Switch Manufacture Care Support Service
Multimode SFP For Brocade ICX6540-24P
Cabling CAT5e or better
Raceway Conduit
PVC Conduit/Flexible Conduit per AP
Red Patch Cables from Patch Panel to POE Switch
Fiber Patch LC to SC; OM3 multimode, S0/125 laser optimized

SOFTWARE

ClearPass licensing for NEW AP
Airwave Wireless Management Suite licensing for NEW AP
ClearPass licensing for NEW AP

D.7.2. Bidder providing equivalent or better WLAN equipment must demonstrate that the equipment is 100% compatible in the GDOE wireless network environment.

Docomo Pacific will be providing preferred GDOE equipment to ensure there is no incompatibility with the GDOE wireless network environment

D.7.3. The Bidder must demonstrate and test the compatibility of the equivalent equipment for the evaluation team during the bids technical proposal evaluation process.

Docomo Pacific will be providing the same equipment currently in place and will not be providing "equivalent equipment"

D.7.4. The Bidder must demonstrate that the proposed layer 2 edge switch is stackable and fully functional with the existing layer 2 switches in the network rack.

Docomo Pacific will be providing the same layer 2 edge switch as current equipment in place.

D.7.5. The Bidder must demonstrate that the existing virtual controller at each site is able to support and manage the configuration of the proposed WAP once installed in the school's WLAN environment.

All equipment deployed will be of the same make and model to ensure existing virtual controller at each site is able to support and manage the configuration.

D.7.6. Bidder must furnish the equivalent equipment for its demonstration and test before the GDOE evaluation team

Docomo Pacific will be using the same make and model equipment of GDOE's preferred equipment.

D.7.7. Bidder shall have the equivalent equipment readily available to demonstrate and test during the technical proposal evaluation scheduled on the day after the closing of the Bid.

D.7.7.1. The evaluation team will schedule the demonstration and notify the Bidder.

D.7.7.2. The demonstration schedule will be held firm. The demonstration can only be rescheduled due to Act of God, Power Outage and/or Issues beyond the Bidders or GDOE control.

D.7.7.3. GDOE will not consider delay of shipment or any delay of equipment not being available at the time of the scheduled demonstration. The bid will be open for no less than 28 days and Bidder should have more than ample time for the equipment to be on hand.

# EXHIBIT E

[REDACTED]

[REDACTED]

[REDACTED]

From: Ken Hellmann [mailto:khellman@Brocade.com]  
Sent: Wednesday, May 04, 2016 8:19 AM  
To: Daniel Coco <dancoco2@icloud.com>  
Subject: RE: Quote for Brocade Parts and Services Urgent

Dan,

Many of the parts are not clear. For example:

- 1) IN the switch description, it says 2X1GSFP. I don't know if that means they include two 1G SFP's or if the switch just accepts two 1G SFP's.
- 2) "POE edge switch 3yr replacement warranty" probably describes our default warranty on the equipment, however, it doesn't include replacement of the SFP's
- 3) "POE edge switch manufacturer care support service" does not indicate what level of support, nor for how long. Our lowest level of support does not include replacement warranty for the SFP's
- 4) "Multi-mode SFP for Brocade ICX6450-24P does not indicate 1G or 10G, but more troubling, it doesn't say if it is a Brocade SFP or just a third party "equivalent". Use of third party optics, commonly done to try to save money, voids the warranty of our switches.
- 5) Finally, there are no stacking cables included, which would preclude the ability to stack with existing switches.

Ken

-----Original Message-----

From: Daniel Coco [mailto:dancoco2@icloud.com]  
Sent: Tuesday, May 03, 2016 9:42 PM  
To: Ken Hellmann <khellman@Brocade.com>  
Cc: Jeff Chan <eljeffo@x2o.net>  
Subject: Quote for Brocade Parts and Services Urgent

Ken I have included the detail description and specifications on the

ICC000033

attached BOM for Brocade. Can you please provide me with a quote for the services and multi mode optic? Please the quote must be accurate for me to comply with the bid specifications.



termination must be adhered to.

D.6.3.11. All supplies and materials required to complete the cable installation shall be furnishing by the vendor.

In rooms with no available Ethernet outlet and network cable, Docomo Pacific will install Cat 5e or better and homerun from the WAP location to the nearest IDF or MDF and meet all requirements listed above

D.7. FURNISH WLAN EQUIPMENT

D.7.1. The Bidder shall provide the complete description and specification of the WLAN equipment to be furnished in its Technical Proposal.

Docomo Pacific will provide the following WLAN equipment to GDOE:

HARDWARE

Aruba Instant IAP-225 Wireless Access Point 802.11n/ac 3x3:3 dual radio US
AP 3 Yr Replacement Warranty
AP Manufacture Care Support Service
AP Mounting Kits
Brocade ICX6540-24P switch, 24 port, 1GB, PoE +390W, 2x1GSFP
POE Edge Switch 3 Yr Replacement Warranty
POE Edge Switch Manufacture Care Support Service
Multimode SFP For Brocade ICX6540-24P
Cabling CAT5e or better
Raceway Conduit
PVC Conduit/Flexible Conduit per AP
Red Patch Cables from Patch Panel to PDE Switch
Fiber Patch LC to SC, OM3 multimode, 50/125 laser optimized

SOFTWARE

ClearPass licensing for NEW AP
Airwave Wireless Management Suite Licensing for NEW AP
ClearPass licensing for NEW AP

D.7.2. Bidder providing equivalent or better WLAN equipment must demonstrate that the equipment is 100% compatible in the GDOE wireless network environment.

Docomo Pacific will be providing preferred GDOE equipment to ensure there is no incompatibility with the GDOE wireless network environment

D.7.3. The Bidder must demonstrate and test the compatibility of the equivalent equipment for the evaluation team during the bids technical proposal evaluation process.

Docomo Pacific will be providing the same equipment currently in place and will not be providing "equivalent equipment"

D.7.4. The Bidder must demonstrate that the proposed layer 2 edge switch is stackable and fully functional with the existing layer 2 switches in the network rack.

Docomo Pacific will be providing the same layer 2 edge switch as current equipment in place.

D.7.5. The Bidder must demonstrate that the existing virtual controller at each site is able to support and manage the configuration of the proposed WAP once installed in the school's WLAN environment.

All equipment deployed will be of the same make and model to ensure existing virtual controller at each site is able to support and manage the configuration.

D.7.6. Bidder must furnish the equivalent equipment for its demonstration and test before the GDOE evaluation team

Docomo Pacific will be using the same make and model equipment of GDOE's preferred equipment.

D.7.7. Bidder shall have the equivalent equipment readily available to demonstrate and test during the technical proposal evaluation scheduled on the day after the closing of the Bid.

D.7.7.1. The evaluation team will schedule the demonstration and notify the Bidder.

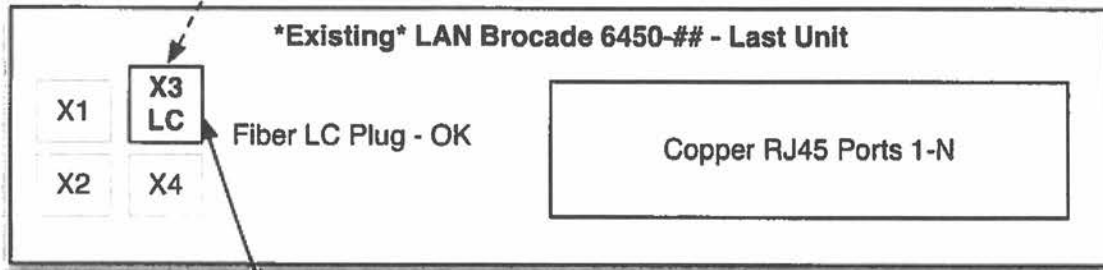
D.7.7.2. The demonstration schedule will be held firm. The demonstration can only be rescheduled due to Act of God, Power Outage and/or Issues beyond the Bidders or GDOE control.

D.7.7.3. GDOE will not consider delay of shipment or any delay of equipment not being available at the time of the scheduled demonstration. The bid will be open for no less than 28 days and Bidder should have more than ample time for the equipment to be on hand.

# EXHIBIT F

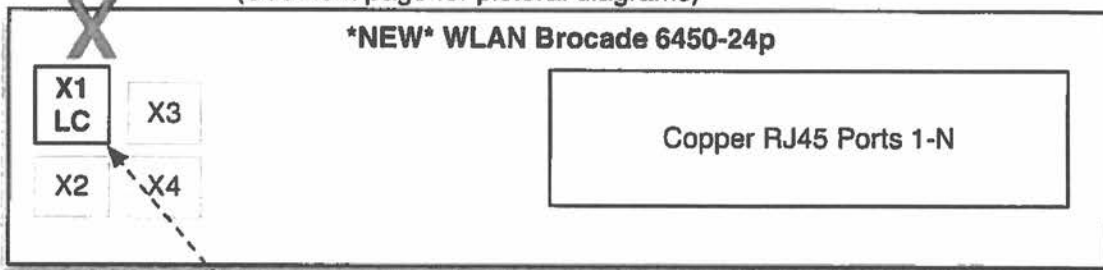
# Non-Functional Brocade Stack As provided by Docomo Pacific

1G or 10G Multimode SFP with a LC Receptacle



LC-SC Fiber Optic Cable

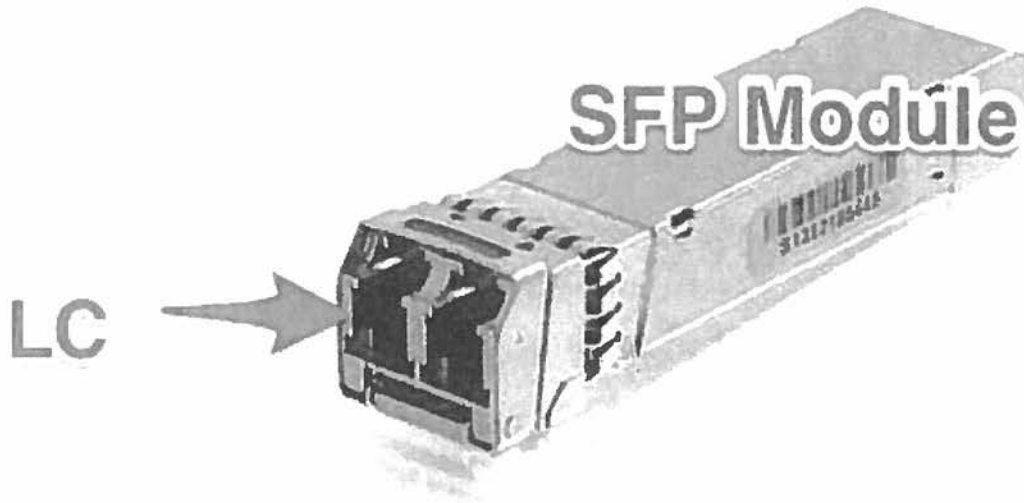
Fiber SC Plug - Can't Connect to LC Port  
(See next page for pictorial diagrams)



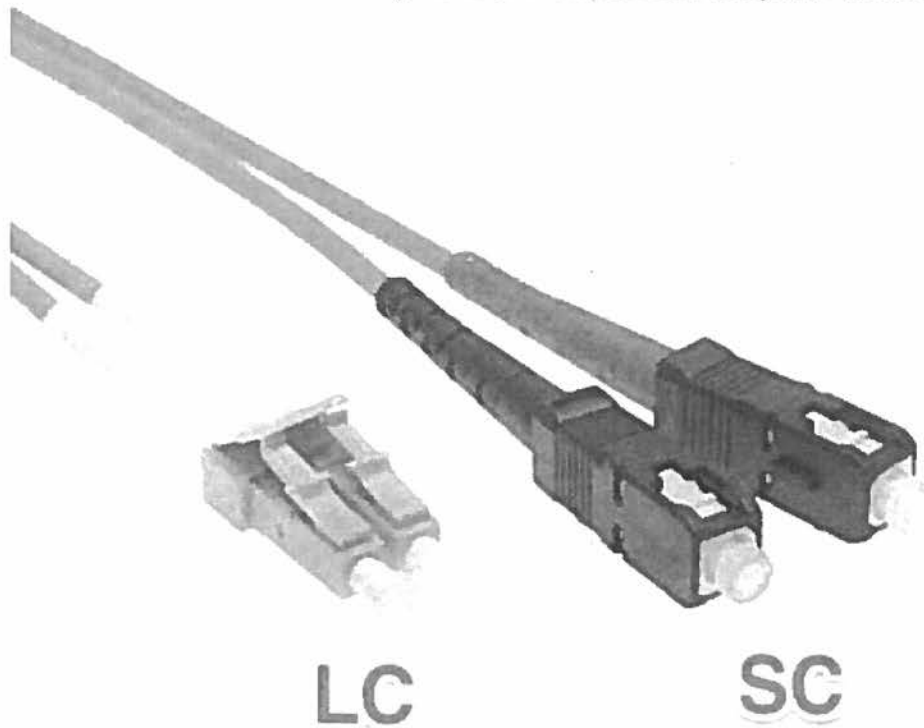
1G or 10G Multimode SFP with a LC Receptacle

# Why SC Plugs do not fit into an SFP Module with a LC Receptacle

1G or 10G Multimode SFPs for Brocade Switches have LC Receptacles

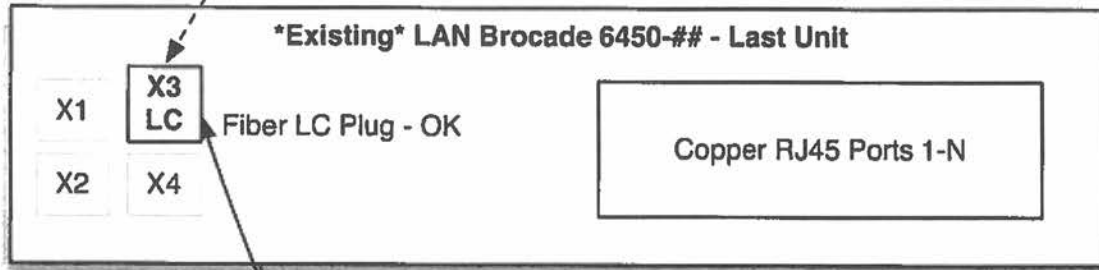


Docomo Pacific provides a non-functional LC-SC Fiber cable (Cable end plugs shown below). It is not possible to fit the SC Fiber Cable Plug into a SFP with an LC Receptacle as shown above.

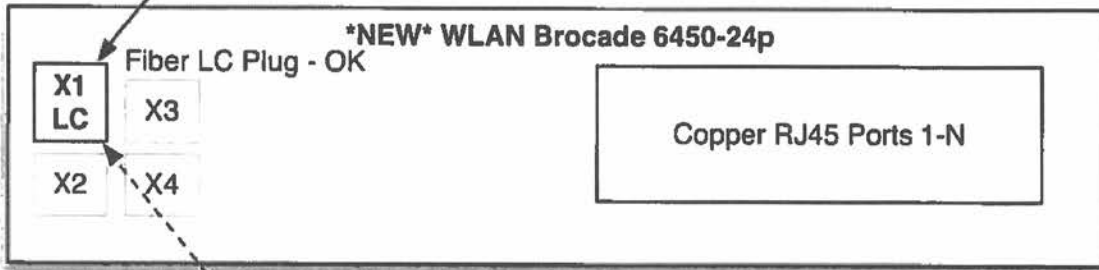


# Functional Brocade Stack using 10G Multimode SFPs

**10G Multimode SFP with a LC Receptacle**  
Valid for stacking use with a Brocade ICX6450-24P



**LC-LC Fiber Optic Cable**  
Valid for stacking use with a Brocade ICX6450-24P  
(\*NOT\* provided by Docomo Pacific)



**10G Multimode SFP with a LC Receptacle**  
Valid for stacking use with a Brocade ICX6450-24P

# EXHIBIT G

## Daniel Coco

---

**From:** Ken Hellmann <khellman@Brocade.com>  
**Sent:** Thursday, March 24, 2016 3:23 PM  
**To:** 'Daniel Coco (dancoco2@icloud.com)'  
**Subject:** Stacking cables for ICX6450

Dan,

If you are going to stack the ICX6450 via fiber optics, the only connectors you are able to use are LC. So the cable would have to be LC to LC.

Best Regards,  
Keb

Ken Hellmann, Strategic Account Manager  
Brocade, Federal Pac Rim  
Seoul, Korea  
E-Mail: [kenneth.hellmann@brocade.com](mailto:kenneth.hellmann@brocade.com)

Korea Mobile: +82 (10) 9059-9821  
USA Mobile: +1 (480) 466-1289  
Tech Support: +1 (408) 333-6061  
Web: <http://www.brocade.com>

SPEND MORE TIME  
ACHIEVING YOUR MISSION  
Less Time Managing Your Network



**BROCADE** 

<http://www.brocade.com/solutions-technology/industry/federal/index.page>

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# BROCADE 10 GBPS USR SFP+ OPTICAL TRANSCEIVER

DATA CENTER

## Optimized, Certified Optical Transceivers for Extending Data Center Networks

### HIGHLIGHTS

- Provides high system reliability based on rigorous qualification and certification testing
- Leverages unique design parameters to provide the highest performance with industry-leading Brocade solutions to support business continuity
- Helps eliminate issues related to transceiver incompatibility, reducing downtime and support costs
- Helps eliminate issues resulting from unexpected design changes, providing ongoing end-to-end compatibility
- Optimizes connectivity with Brocade platforms to enable maximum cable distance

The Brocade One™ strategy helps simplify networking infrastructures through innovative technologies and solutions. The Brocade optics family supports this strategy by delivering thoroughly tested and standards-compliant optics that enable simple, non-stop connectivity across diverse storage resources.

Today's enterprise data centers and networking environments are undergoing an infrastructure transformation, requiring higher speeds, greater scalability, and higher levels of performance and reliability to better meet the demands of business.

As speed and performance needs increase, optical transceivers have become an integral part of overall system design.

However, optical transceiver design margins and parameters vary widely, and can be the difference between an optimized, highly reliable fabric and incompatibility issues that drive up support costs.

The Brocade® 10 Gbps Ultra-Short Range (USR) Ethernet optical transceiver, part of the Brocade family of Small Form-Factor Pluggable (SFP) optical transceivers, is optimized to fully leverage the Brocade 10 Gigabit Ethernet (GbE) switches, routers, and Converged Network Adapter (CNA) products. Together, these optical transceivers provide state-of-the-art performance, helping IT organizations achieve new levels of infrastructure consolidation while expanding the capabilities of their applications and services.

### END-TO-END COMPATIBILITY AND RELIABILITY

Brocade 10 Gbps USR Ethernet optical transceivers support highly reliable operations in data center networks, and

are optimized for Brocade switching platforms. They undergo rigorous qualification and certification testing to provide an end-to-end solution that is easier to maintain—helping improve the availability of data center networks supporting mission-critical applications.

### KEY FEATURES

Brocade 10 Gbps USR SFP+ transceivers are hot-swappable, low-voltage (3.3 V) digital diagnostic Ethernet optical transceivers that support high-speed serial links over multi-mode optical fiber at signaling rates up to 10.3 Gbps. They comply with SFP mechanical (SFF-8432), optical, and electrical specifications (FC-PI-4) for LC duplex transceivers.

Highlights include:

- 850 nm VCSEL laser
- Diagnostic features per SFF-8472 "Diagnostic Monitoring Interface for Optical Transceivers," providing real-time monitoring of:
  - Transmitted optical power
  - Received optical power
  - Laser bias current
  - Temperature
  - Supply voltage

**BROCADE**

ICC000042



- Industry-standard LC duplex connector
- 100 m link lengths on OM3 multi-mode fiber
- Interoperates with 10GBase-SR-compliant devices up to 100 m
- IEC 60825-1 Class 1/CDRH Class 1 laser eye safe
- Compliance with Restriction on Hazardous Substances (RoHS) directive

#### FAMILY OF OPTICAL TRANSCEIVERS

Brocade offers a comprehensive family of reliable optical transceivers to provide highly compatible, high-performance connectivity to Brocade backbone, director, and switch products.

For additional ordering information, contact a Brocade representative or visit [www.brocade.com/howtobuy](http://www.brocade.com/howtobuy).

#### BROCADE GLOBAL SERVICES

Brocade Global Services has the expertise to help organizations build scalable, efficient cloud infrastructures. Leveraging 15 years of expertise in storage, networking, and virtualization, Brocade Global Services delivers world-class professional services, technical support, network monitoring services, and education, enabling organizations to maximize their Brocade investments, accelerate new technology deployments, and optimize the performance of networking infrastructures.

#### CLOUD-OPTIMIZED NETWORK ACQUISITION

Brocade helps organizations easily address their information technology requirements by offering flexible network acquisition and support alternatives to meet their financial needs. Organizations can select from

purchase, lease, and Brocade Network Subscription options to align network acquisition with their unique capital requirements and risk profiles.

#### MAXIMIZING INVESTMENTS

To help optimize technology investments, Brocade and its partners offer complete solutions that include professional services, technical support, and education. For more information, contact a Brocade sales partner or visit [www.brocade.com](http://www.brocade.com).

## LC Connector

#### BROCADE 10 GBPS USR SPECIFICATIONS

Systems	
Performance	10.3 Gbps line speed, full duplex
Media	Hot-pluggable, industry-standard Small Form Factor Pluggable (SFP+), LC connector; Ultra-Short Range (USR)
Operating parameters	Transmit (Tx): Wavelength: 840 to 860 nm Average power: -7.3 to -1.0 dBm RIN: -128 dB/Hz max Optical return loss: 12 dBm max OMA: -5 dBm min Receive (Rx): Wavelength: 840 to 860 nm Average power: -9.9 to -1.0 dBm Optical return loss: -12 dBm max SRS OMA: 180 µW, -7.5 dBm 3 dB cutoff maximum: 12.3 GHz
Mechanicals	
Size	Width: 14.80 mm (0.58 inches) Height: 12.30 mm (0.48 inches) Depth: 56.50 mm (2.22 inches)
Environmental	
Storage temperature	-40°C to 85°C / -40°F to 185°F
Power	
Power dissipation (max)	1 W

#### Ordering Part Number

- 10G-SFPP-USR (1-pack)
- 10G-SFPP-USR-8 (8-pack)

#### Regulatory and Standards Compliance

- North America: UL/CSA 60950, CDRH Class 1
- European Union: EN 60590, EN 60825 Class 1

#### Caution:

- Do not look through the optical ports, as it is a potential eye hazard.
- SFP is an ESD sensitivity class-2 device. It should be handled accordingly.

For information related to SFF Committee documentation, visit [www.sffcommittee.org](http://www.sffcommittee.org).

For information about supported SAN standards, visit [www.brocade.com/sanstandards](http://www.brocade.com/sanstandards).

For information about switch and device interoperability, visit [www.brocade.com/interoperability](http://www.brocade.com/interoperability).

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