



624 North Marine Corps Drive
Tamuning, Guam 96913
Tel: 671.644.1609
Fax: 671.644.2754
Email: squenga@gta.net

January 13, 2012

Mary Okada, President
Joleen Evangelista, Chief Procurement Officer
Guam Community College
Sesame Street
Mangilao, Guam
Fax no.

Re: Protest of GCC IFB 11-020/Wireless Network and Access Point Installation

Dear President Okada,

Pursuant to 5 GCA Chapter 5 and 2 GAR Chapter 9, Teleguam Holdings, LLC ("GTA") hereby submits its protest the award of the bid in GCC IFB11-20 to MCV. GTA became aware of the award to MCV when the Notice of Non-Award was received on December 29, 2011. GTA is an actual aggrieved bidder pursuant to 5 GCA § 5425 and 2 GAR § 9101. GTA's protest is based upon the grounds enumerated below which show that MCV's bid is unresponsive to the bid requirements.

In a review of the solution that was submitted by MCV to deliver to the College for the Wireless Network and Access Point Installation, we believe that this solution doesn't provide the needed capacity as specified in the GCC's bid specifications. As a point of information the access points proposed by MCV were only 50 access points whereas GTA proposed 112 access points, the proposed MCB will not meet GCC's capacity. The bottom line, it is not about coverage that GCC requires, but about capacity

The Ruckus equipment proposed is bidding less than half of the proposed Access Points. While claiming the Ruckus APs have greater range, but at the deep cost of capacity, especially in an educational environment. The GCC campus is made of block walls and will need more APs than proposed. This is not a college-grade deployment that MCV is proposing. It will not handle voice/video/data at these access point densities.

Other items in the spec that the Ruckus solution cannot meet include the below:

The MCV proposed products offered do not meet or support these security requirements :

Pg. 4, MCV's Appendix A, Descriptive Literature, Ruckus ZoneDirector 3000 Wireless Controller, Management

Wireless Intrusion Detection (WIDS)	Rogue AP detection DoS attack prevention Password guessing protection Rate limiting
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The proposed products are not known to meet these requirements:

Pg 2, Bid Specifications, 1. Quality, Industry Standards, and Access Point Specifications, Access Points, Supports over W-Fi

Supports Video over Wi-Fi

- a. Supports conversion of multi-cast to unicast streams
- b. Provides access control to the RF medium for subscription to a video feed

Supports Access Point and Wi-Fi Threat detection

The proposed products cannot meet these requirements:

Pg. 2, Bid Specifications, Section 1. Quality, Industry Standards, and Access Point Specifications Access Points, Rogue Access Point and Wi-Fi Threat detection

- d. Accurate Location Tracking System that is capable of pointing out where Rogue APs or where Interfering devices are located on a floorplan
- e. Wi-Fi Threat sensor, capable of detecting Man-in-the-Middle attacks and other commonly seen attacks

The proposed products cannot meet these requirements:

Pg. 2, Bid Specifications, Section 1. Quality, Industry Standards, and Access Point Specifications Access Points, Optional Spectrum Analyzer/Interference:

Optional Spectrum Analyzer/ Interference

- a. OPTIONAL: Spectrum analyzer capable of classifying interfering devices such as Bluetooth, Microwave ovens etc
- b. OPTIONAL: Be able to correlate and classify interferers through spectrum analysis. For example, when an interferer is heard by multiple APs, the system should report this as a single interferer
- c. OPTIONAL: Be able to locate multiple interferers simultaneously on a map and be able to show the zone of impact on a map for interfering devices
- d. OPTIONAL: Use spectrum analysis to identify non-802.11 sources of interference like Bluetooth headsets, video cameras, etc. while simultaneously servicing clients and performing Intrusion Detection
- e. OPTIONAL: Ability to change channels based on detected interference patterns to improve network performance

The proposed products are not known to meet these requirements:

Pg.3, Bid Specifications, Section 1. Quality, Industry Standards, and Access Point Specifications Access Points, Overall Solution and Standards:

- e. Supports external antenna connection via SMA/TNC or N connectors
- f. Use Multi-radio Wi-Fi Modules



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- g. Have automatic user load balancing among radios and between access points.
- h. Have both automatic and manual control of area coverage

The proposed products cannot meet these requirements:

Pg. 6 Bid Specifications, Section 5. Systems Administration, Management, and Control, System Administration, Management, and Control Tools, i. Have a RF Management tools with:

- i. Have RF management tools with
 - 1. Integrated Wi-Fi RF Analyzer (similar to standalone spectrum analyzers, but integrated within the access point)
 - 2. Must be able to scan WiFi frequencies and identify any interference and/or noise within these frequencies

The proposed products are not known to meet these requirements:

Pg. 7. Bid Specifications, Section 6 Enterprise Wireless Security, Security Services and Features Supported or have:

- i. Station-to-station traffic blocking
- j. The following certifications - PCI, HIPPA, and FIPS-140-2
 - k. Traffic Encryption/documentation at the access point

Thank you for your prompt and expeditious attention to this protest. If more information is necessary please contact me.

Respectfully submitted,

Andrew S. Quenga
GTA Legal Counsel