Nevada E-Rate Weekly News

Weekly E-Rate Newsletter Vol. 1, No. 1 October 30, 2017

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Nevada Broadband Summit – Register Now

The Governor's Office is hosting the first Governor's Broadband Summit this coming Monday, November 6, 2017. at the State Capitol in Carson City. With a welcome and morning keynote speakers by Governor Brian Sandoval and CEO and Founder of Education Superhighway, Evan Marwell, the day's discussions will be sharing the State's broadband vision and includes breakout sessions on topics such as E-rate, Telemedicine and Cybersecurity. Register today for free and find a copy of the full agenda at:

https://www.eventleaf.com/nevadabroadbandsummit2017#sessions. We hope to see you there.

Funding Status – FY 2017

FY 2017:

Wave 22 for FY 2017 was released Friday, October 27th, for a total of \$52.1 million. Funding for Nevada was \$750 thousand for 2 districts. Cumulative national funding through Wave 22 is \$1.64 billion, including \$6.2 million for Nevada. Wave 23 is scheduled to be released on Friday, November 3rd.

Initial Comments on the FCC's Category 2 Public Notice

Initial comments were submitted on the FCC's Public Notice (<u>DA 17-921</u>) regarding the ongoing level, structure, and application processing of Category 2 ("C2") funding. The current budgeting process was established in 2014 under a 5-year test period with plans to revisit the issue before

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FY 2019. This Notice is the first step in the process. FY 2019 would be the final funding year of the 5-year budget cycle for applicants who had begun Category 2 funding in FY 2015.

The submitted comments, many of them quite short, all encouraged the FCC to continue funding Category 2 equipment and services. In our view, there is little risk that the FCC is planning to discontinue such funding, but strong public support for the program is heartening.

In general, the more extensive comments focused on two recommendations to expand and simplify the Category 2 funding mechanism, namely:

- Replace the individual school and library budgeting process with more flexible districtwide or system-wide budgets; and
- Increase the budget amount per student or per square foot, particularly for small rural schools and libraries.

The following links to specific comments are worth reviewing:

ALA — Extend C2 another 5 years. System-wide funding. Additional IMLS locale code.

<u>Aruba (HP)</u> — Funding for technical assistance, network security, and management services.

<u>CoSN</u>, <u>ESH</u>, <u>FFL</u> — Administrative improvements: District-wide funding. Increased per student budget.

E-MPA — District-wide funding and increased per-student budget.

ESC 12 — Examples of C2 costs not covered by \$150/student.

<u>Friday Institute</u> (NC) — Good data. Non-linear funding. More Wi-Fi spectrum.

<u>NM Public School Facilities Authority</u> — Increased per-student funding for small remote schools.

NM Public School Capital Outlay Council — Continued C2 support.

NM Library Association — Continued C2 support.

Pennsylvania DOE — District-wide funding and other simplifications.

<u>SHLB Coalition</u> — Inter-school flexibility. Streamline Form 500 reductions. Wi-Fi on buses. Square-foot budget for special needs schools. Preferred master contracts.

SECA — District-wide funding.

Reply comments on the Category 2 proceeding are due November 7th.

New FCC Rules for Tracking Threatening Calls

The FCC issued new rules (FCC 17-132) to give law enforcement agencies immediate access to Caller ID tracking information in situations involving threatening calls to schools and certain other organizations. As discussed in several previous newsletters, this is not an E-rate issue, but is another FCC regulatory matter that may be critical to schools nationwide. Until now, access to blocked Caller ID information required a school-specific FCC waiver. Delays in obtaining such waivers obviously impeded effective and timely responses to the threats.

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A "threatening call" is defined as "any call that conveys an emergency involving danger of death or serious physical injury to any person requiring disclosure without delay of information relating to that emergency." According to studies referenced in the FCC's order, bomb threats to schools have increased dramatically over the past 6-7 years. The threats themselves, even if ultimately proven false, can lead to highly disruptive school closures. E-Rate Central filed <u>comments</u> in support of this rulemaking earlier this year.

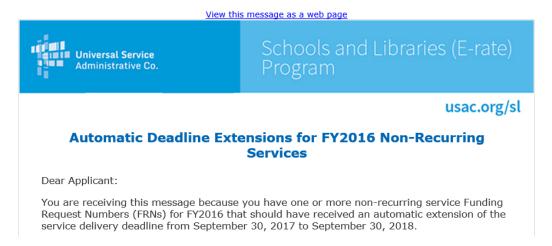
Updates on USAC's E-Rate Productivity Center and Legacy System

Automatic Deadline Extensions for FY 2016 Non-Recurring Services:

Last week, USAC began sending out emails notifying affected applicants that their Service Delivery Deadlines ("SDDs") for FY 2016 non-recurring services have been automatically extended. The extensions apply to applicants who received original FCDLs or subsequent RFCDLs on or after March 1, 2017. RFCDLs include approvals of appeals, SPIN changes, or service substitutions. The emails — which fall into the "better late than never" category since the original SDD was last September 30th — were clearly identified as extension notices.

From: USAC Schools and Libraries [mailto:e-rate@lists.universalservice.org]
Sent: Wednesday, October 25, 2017 3:57 PM
To:

Subject: Your FY2016 Non-recurring Service Delivery Deadline Extension



The emails, which list the affected FRNs, indicate that USAC will continue to identify any other FRNs that meet the automatic extension criteria, but warn that notifications sent to applicants' EPC News Feeds may not feature the extended deadlines. Deadlines, when extended, should be reflected in updates to the FRN Extension Table.

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FY 2016 Invoice Deadlines and Form 486 Notification Letters:

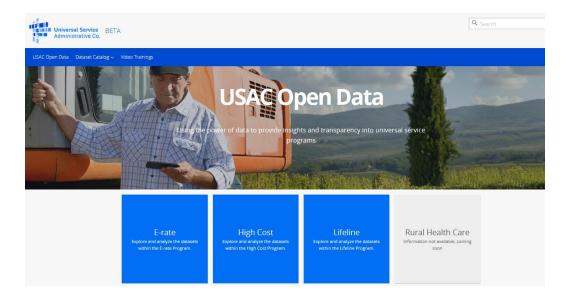
<u>USAC's News Brief of October 27th</u> (also referenced below) reminds applicants and service providers that the invoice deadline for FY 2016 recurring services, nominally this Monday, October 30th, may have been extended for any applicants receiving Form 486 Notification Letters after June 30, 2017.

Unfortunately, USAC notes, its system is currently unable to automatically calculate extended invoice deadlines on the affected FRNs, so they are updating the dates manually via weekly queries. As recalculated, the new deadlines should be 120 days following the date of an applicant's Form 486 Notification Letter. Again, as in the previous article, deadlines, when extended, should be reflected in the FRN Extension Table.

Note that this Monday's nominal invoice deadline is also the nominal deadline for filing Invoice Deadline Extension Requests ("IDERs"). It is not immediately clear how USAC's system will process — or will not process — IDERs filed now on FRNs with manually extended invoice deadlines. When in doubt, we recommend calling USAC's Client Service Bureau ("CSB") at 888-203-8100, and retaining the case number and all followup email correspondence.

New Open Data Platform:

Last Friday, USAC launched a new "Open Data" platform providing API access to the expanding data generated by the four Universal Service Fund ("USF") programs. The site is now currently available on a beta test basis with data for E-rate and two of the other USF programs. Information on other data sets, as well as more detailed USAC information on the use of the new platform, will be available soon. A portion of the home screen is shown below.



The E-rate data currently available, accessible by clicking the blue E-rate square, includes:

• Competitive Form 470 bidding information

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- o Basic data
- o Consortium data
- Consultant data
- Services requested
- Form 471 funding request information
 - o Basic data
 - Connectivity data
 - Discount calculation data
 - o FRN line item data
 - o FRN status information
 - o Recipients of service data
- Supplemental information (including annexes)

E-Rate Updates and Reminders

Upcoming 2017 E-Rate Dates:

October 30 Invoicing deadline for FY 2016 recurring services. (Note: The normal October 28th deadline falls on a Saturday pushing this year's actual deadline to the following Monday.) Important note: Requests to extend this deadline, if needed, will be automatically granted by USAC if filed on or before this Monday. Invoice Deadline Extension Requests ("IDERs") can be filed for specific FRNs by logging into the Online BEAR System.

November 1 Form 486 deadline for FY 2016 funding committed in Wave 53. More generally, the Form 486 deadline is 120 days from the FCDL date or the service start date (often July 1st), whichever is later. Upcoming FY 2016 Form 486 deadlines in November include:

Wave 54	11/08/2017
Wave 55	11/15/2017
Wave 56	11/22/2017
Wave 57	11/29/2017

November 7 Form 486 deadline for FY 2017 funding committed in Wave 6. Upcoming FY 2017 Form 486 deadlines in November include:

Wave /	11/13/2017
Wave 8	11/20/2017
Wave 9	11/27/2017

Applicants missing these (or earlier) deadlines should watch carefully for "Form 486 Urgent Reminder Letters" in EPC. The Reminders will afford applicants with 15-day extensions to submit their Form 486s without penalty.

11/10/0017

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November 7 Reply comments due on the FCC's inquiry (<u>DA 17-921</u>) on revisions to Category 2 budgets.

USAC Fall E-Rate Training:

USAC's annual fall training sessions have been held in Washington, DC, and Charlotte, NC. Presentation slides for the trainings are available <u>online</u>. Additional USAC workshops will be held at the following locations:

November 2 Minneapolis, MN

November 14 Portland, OR

USAC News Brief Dated October 27 – Update on Hurricane Relief

<u>USAC's Schools and Libraries News Brief of October 27, 2017</u> provides additional and more detailed information on the relief provided to applicants affected by hurricanes Harvey, Irma, and Maria as discussed in its <u>September 15th News Brief</u> and the broader USF-related FCC Order <u>DA 17-984</u>. Additionally, FCC Chairman Pai released a <u>statement</u> last week indicating that he had circulated a proposed emergency order to the other Commissioners, not yet publicized, that would further assist schools and libraries recover from the hurricanes' devastation.

Newsletter information and disclaimer: This newsletter may contain unofficial information on prospective E-rate developments and/or may reflect E-Rate Central's own interpretations of E-rate practices and regulations. Such information is provided for planning and guidance purposes only. It is not meant, in any way, to supplant official announcements and instructions provided by the SLD, FCC, or OSIT.

For further information on E-rate, follow us on Twitter, Facebook, and LinkedIn.



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