

## E-Rate Central News for the Week of August 19, 2019

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### Funding Status – FY 2019

USAC released Wave 17 for FY 2019 on Thursday, August 15<sup>th</sup>. Funding totaled \$78.6 million including \$459.2 thousand for Nevada. Cumulative commitments through Wave 17 are \$1.39 billion including \$5.97 million for Nevada.

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

#### *Form 498 Update Request:*

As discussed in our [last newsletter](#) and in [USAC’s News Brief of August 9<sup>th</sup>](#), USAC is asking applicants and service providers to update their Form 498s to:

- Add business type information as required by the [Digital Accountability and Transparency Act of 2014](#) (“DATA Act”); and, if necessary,
- Provide or correct the organization’s Dun and Bradstreet number (“D-U-N-S<sup>®</sup>”).

USAC’s initial request to update Form 498s was sent to most applicants and service providers (or their consultants) last Monday via email. It is not immediately clear how specific email addresses were selected.

The subject line of the email (shown below) began “Action Required.” The body of the email was headed by the USAC blue banner followed by the most basic information on why updates were needed and how to make them. The emails generated a number of immediate questions, some of which USAC is statutorily prevented from answering.



Mon 8/12/2019 11:41 AM

USAC <DoNotReply@usac.org>

Action Required: Update FCC Form 498 with Business Type(s) and DUN Number

To

You forwarded this message on 8/12/2019 11:42 AM.

[View this email as a web page.](#)



## Update FCC Form 498 with Business Type(s) and Dun and Bradstreet Number

Based on what we know to date, the following is our unofficial FAQ on USAC’s Form 498 update effort, still with some unanswered questions.

**Q:** Is there a deadline for updating the Form 498?

**A:** USAC has not announced a specific update deadline. We expect USAC to continue to push unresponsive Form 498 filers, applicants and service providers, for updates via periodic emails. To stay in USAC’s good graces, we would encourage applicants to update their Form 498s by the October 28<sup>th</sup> MRC invoice deadline for FY 2018.

Form 498s are currently required only for applicants filing BEAR invoices. There is no indication that applicants who have not filed Form 498s will be required to file in the future solely to report business types and DUNS numbers.

**Q:** What business type(s) should an applicant select?

**A:** Although there was some unofficial guidance from CSB earlier last week, USAC’s official position is that it cannot tell applicants — or provide any guidance on — what business types to select. In the absence of official guidance, here is our advice for the major applicant types:

- |  |  |
|--|--|
| Regional ESA, library system,<br>or consortia: | Choose “Regional Organization”   |
| Public school districts:                       | Choose “Independent School District”   |
| Independent or charter school:                 | If confirmed, choose “Nonprofit with 501C3 IRS<br>Status (Other than an institution of Higher<br>Education),” otherwise choose “Other” |
| Individual library or branch:                  | Choose “Other”   |

**Q:** Will USAC penalize applicants for choosing the wrong business type(s)?

**A:** It appears that USAC’s position is that business type is a “reporting” issue under the DATA Act and that USAC does not plan to second guess an applicant’s choice. USAC is looking for an answer, not a specific or reviewable answer.

Note: Although there are no indications that business type errors would affect USAC disbursement decisions, remember that actual payments are made by the U.S. Treasury which may operate under other reporting and review criteria.

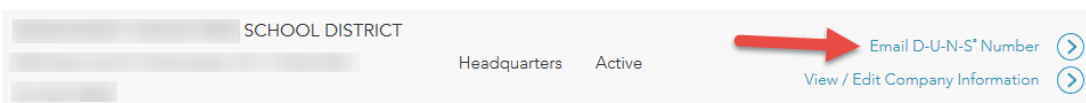
**Q:** How does an applicant or service provider find the correct D-U-N-S® number?

A: Use Dun & Bradstreet's [D-U-N-S® Number Lookup](#). Enter the key name and address information and "Search."

## Dun & Bradstreet D-U-N-S® Number Lookup

Look up a partner's company or find your company's D-U-N-S Number.

Select the correct organization in the results screen and request that the D-U-N-S® number be emailed to you.



Q: How does an applicant update its Form 498?

A: Within EPC, starting from the Landing Page, follow these steps:

1. Under the "Records" tab at the top of the page, select "FCC Form 498."

Note: Special permission is required to access the Form 498. Only the applicant's EPC Form 498 designated General Financial Contact or School or Library Official can access the Form. If the Form 498 is not listed in a user's list of Records (it should be in numerical order between the Form 486 and Form 500), the user is not the General Financial Contact or School or Library Official. Either have your Account Administrator designate the user to be either the General Financial Contact or School or Library Official to complete this item or assign the responsibility to the appropriate party who already has the permissions.

2. Click on the nickname or 498 ID of the form to be modified.
3. Click on "Related Actions" at the top of the page and then on "Modify FCC Form 498."
4. Navigate to the page of the form you want to modify using the "Save and Continue" button.
5. Update the form as needed:
  - Select the "Business Type" from the pulldown menu.
  - Enter or Correct the D-U-N-S® number, if needed.
6. Continue to click "Save and Continue" until you have submitted your form.
7. Re-certify the form. Until the form has been re-certified, the form will display the status "In Progress."

Note: Only a School or Library Official can certify the updated form.

### *Downloading "Current" PDF Version of Form 471:*

EPC has long provided applicants with the ability to generate, download, and/or print PDF versions of their original Form 471s as filed and certified. As of last week, applicants are now able to generate and download PDF versions of their "current" FY 2019 Form 471s. Importantly, the current versions reflect any changes made during the PIA review process or additional post-commitment changes made through appeals, Form 500s, SPIN changes, service substitutions, etc. (see [USAC's Schools and Libraries News Brief of August 9, 2019](#)).

To generate and download a current Form 471 PDF within EPC, start with the “FCC Forms” tab and select the desired FY 2019 Form 471.

Records / Applicant Entities  
#16 [redacted] - [redacted]

CREATE FCC FORM 470 CREATE FCC FORM 471 CREATE FCC FORM 486

Summary Customer Service Modifications Additional Information Discount Rate Category Two Budget Contracts **FCC Forms** FRN Appeals News Related Actions

Category: FCC Form 471

**FCC Forms 471**

Funding Year: 2019

Status:  All  
 Incomplete  
 Certified  
 Committed

Application Number	Nickname	Funding Year	Status	Certified Date
1910	[redacted]	2019	Committed	3/15/2019 4:26 PM EDT

At the bottom of the Form 471 page is a hotlink to the original version of the Form 471 and a new description of the current version with a download button.

### FCC Form 471 Generated Documents

FCC Form 471 Version	Description
Original Version	This document contains information that was submitted to USAC upon certification of the FCC Form 471.

**An updated version of the FCC Form 471 PDF is now available for download.** This update is only available for applications that have been committed. This Current Version document will include any changes made during the PIA review process, and can be re-generated again in the future if any additional changes are made through Appeals, FCC Forms 500 or other post-commit requests.

[DOWNLOAD CURRENT PDF](#)

Generating the current PDF version may take a few minutes. When it’s ready, you will receive an email from USAC with a link to the Form 471 (requiring a new EPC login).

Wed 8/14/2019 10:31 AM

US Universal Service Administrative Company (USAC) <portal@portal.usac.org>

**New Task: The Current Version FCC Form 471 document is ready**

To

If there are problems with how this message is displayed, click here to view it in a web browser.

**Universal Service Administrative Co.**

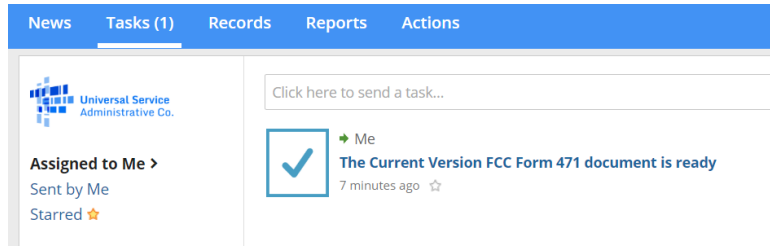
**The Current Version FCC Form 471 document is ready**

This task was assigned to you on Aug 14, 2019 10:30 AM EDT  
The task priority is Normal

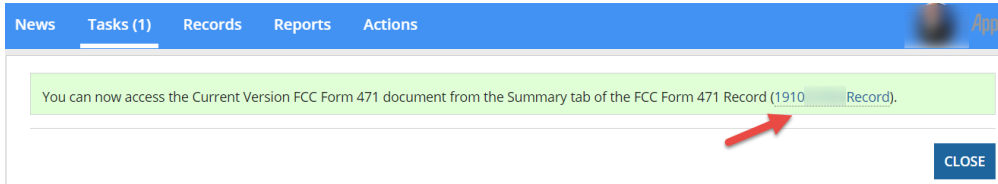
To view the task, please [follow this link](#)

This message has been sent by EPC

Alternatively, EPC generates a new “Task” indicating the new document is available.



The new Task provides a link back to the EPC Form 471 webpage that now includes a link to the current version.



Then:

### FCC Form 471 Generated Documents

FCC Form 471 Version	Description
Original Version	This document contains information that was submitted to USAC upon certification of the FCC Form 471.
Current Version	This document contains the most recent commitment information up to when it was downloaded (8/14/2019 10:30 AM EDT).

The Current Version document can be downloaded again to include any updates made through post-commit requests (i.e., Appeals, FCC Forms 500, SPIN changes, Service Substitutions). **EPC will not save prior versions of the Current Version PDF.** Be sure to save the existing Current Version before updating.

[UPDATE CURRENT PDF](#)

The current Form 471 PDF version is in the same format as the original PDF version, but includes all changes made since the Form 471 was first filed and certified. For documentation purposes, be careful to retain the last page of the PDF that shows the date and time that the current version was created (as well as the date and time the original Form 471 was certified).

**Certified Timestamp**      15-March-2019 16:26:57 EDT

**Current Version Created**      14-August-2019 10:30:28 EDT

The following restrictions on the current PDF version, noted in last week's newsletter, bear repeating:

- The current version option will only be available for Form 471s certified for FY 2019 and future funding years.
- The current version will be available only when the application is committed.
- When you generate a current version, that version will NOT be updated automatically with any subsequent changes. If there are changes to the data on the form, you must regenerate the current version by clicking the "UPDATE CURRENT PDF" button.
- The current version link expires about two months after you first generate it (i.e., save it locally to have continued access). Alternatively, the most current version can be regenerated by going through the "DOWNLOAD CURRENT PDF" process again.
- The [FRN Status Tool](#) and the [Open Data Platform](#) will not have a link to the current version of the form.

## E-Rate Updates and Reminders

### *Upcoming E-Rate Dates:*

August 21	USAC webinar on the <a href="#">invoicing process</a> .						
August 26	Deadline for submitting reply comments on the FCC’s NPRM ( <a href="#">FCC 19-46</a> ) regarding a possible cap on total funding of the Universal Service Fund (“USF”). (See our <a href="#">newsletter of June 3<sup>rd</sup></a> .)						
September 3	Deadline for submitting reply comments to the FCC’s Notice of Proposed Rulemaking (“NPRM”) on the future of Category 2 funding for FY 2020 and beyond ( <a href="#">FCC 19-58</a> ). (See the article below on initial comments.)						
September 3	Deadline for submitting initial comments on the FCC’s draft ESL for FY 2020 ( <a href="#">DA 19-738</a> ). Reply comments are due September 18 <sup>th</sup> . (See our <a href="#">newsletter of August 5<sup>th</sup></a> .)						
September 6	Deadline for submitting USAC invoice appeals related to reissued BEAR Notification Letters. (See our <a href="#">newsletter of July 15<sup>th</sup></a> .)						
September 11	Form 486 deadline for FY 2018 funding committed in Wave 55. More generally, the Form 486 deadline is 120 days from the FCDL date or the service start date (typically July 1 <sup>st</sup> ), whichever is later. Other upcoming Form 486 deadlines are: <table> <tr> <td>Wave 56</td> <td>N/A (no commitments)</td> </tr> <tr> <td>Wave 57</td> <td>10/03/2019</td> </tr> <tr> <td>Wave 58</td> <td>10/11/2019</td> </tr> </table>	Wave 56	N/A (no commitments)	Wave 57	10/03/2019	Wave 58	10/11/2019
Wave 56	N/A (no commitments)						
Wave 57	10/03/2019						
Wave 58	10/11/2019						
	Note 1: Applicants missing any Form 486 deadline should watch carefully for “Form 486 Urgent Reminder Letters” in their EPC News Feed. These Reminder Letters afford applicants 15-day extensions to submit their Form 486s without penalty.						
	Note 2: The first Form 486 deadline for FY 2019, covering funding committed in Waves 1-10, will be October 29, 2019.						
September 16 – November 21	See USAC’s <a href="#">2019 Training</a> webpage for a schedule of all USAC 2019 fall applicant and tribal training sessions.						

September 23      Deadline for submitting comments to the USDA’s proposal to revise the categorical eligibility of families in the Supplemental Nutrition Assistance Program (“SNAP”) ([FNS-2018-0037](#)). See our [newsletter of August 5<sup>th</sup>](#) for E-rate implications.

*Category 2 NPRM Comments:*

Last Friday was the deadline for filing initial comments on the FCC’s Notice of Proposed Rulemaking (“NPRM”) ([FCC 19-58](#)) on the future of Category 2 funding for FY 2020 and beyond. Here are links to some of the more important filings:

- [American Library Association \(“ALA”\)](#)
- [Council of the Great City Schools](#)
- [EducationSuperHighway](#)
- [E-Rate Expertise](#)
- [E-Rate Management Professionals Association \(E-mpa”\)](#)
- [Funds For Learning](#)
- [State E-Rate Coordinators’ Alliance \(“SECA”\) and Schools, Health & Libraries Broadband Coalition \(“SHLB”\)](#)

The filed comments differ, but the following themes were stressed by many parties:

- The five-year Category 2 budget trial was successful; the approach should be continued on a permanent basis.
- Budgets should be administered on a billed entity basis for school districts and library systems.
- Minimum budgets for small entities, per student budget factors for schools, and per square foot budget factors for non-urban libraries should be increased.
- Additional flexibility is needed in terms of product and service eligibility including use in non-instructional facilities (“NIFs”).
- The administration of the program can be simplified by standardizing the five-year budget period and, in the absence of major entity changes, eliminating year-to-year variations in an entity’s total budget amount.

Reply comments on the Category 2 NPRM are due September 3<sup>rd</sup>. Initial comments on the FCC’s draft Eligible Services List (“ESL”) for FY 2020, which could have a bearing on Category 2 eligibility issues, are also due September 3<sup>rd</sup>.

### **USAC News Brief Dated August 16 – Form 498 and Training**

[USAC’s Schools and Libraries News Brief of August 16, 2019](#), covers:

- The new Form 498 business type field (discussed in greater detail above).

- Reminders on the fall applicant and tribal training.
- Notice of the USAC webinar on the [invoicing process](#) on August 21<sup>st</sup>.

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*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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Office of Science, Innovation and  
Technology