Weekly E-Rate Newsletter
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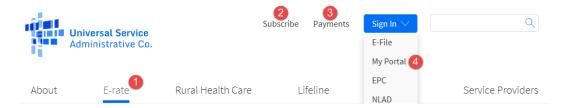
Funding Status – FY 2019

USAC released Wave 33 for FY 2019 on Thursday, November 14th. Funding totaled \$20.5 million – none for Nevada. Cumulative commitments through November 14th are \$1.95 billion including \$7.3 million for Nevada.

Navigating USAC's New E-Rate Website

As announced in its <u>November 8th News Brief</u>, USAC has completely redesigned its entire website, not only for USAC itself, but for all four Universal Service Fund programs. The banner atop every page provides access to several sections of potential interest to E-rate applicants and service providers including:

- 1. Homepage for the E-rate section
- 2. "Subscribe" link with an option for the USAC's E-rate weekly News Brief
- 3. "Payments" link with an option for returning funds to USAC
- 4. "Sign In" button with an option to log into the EPC portal



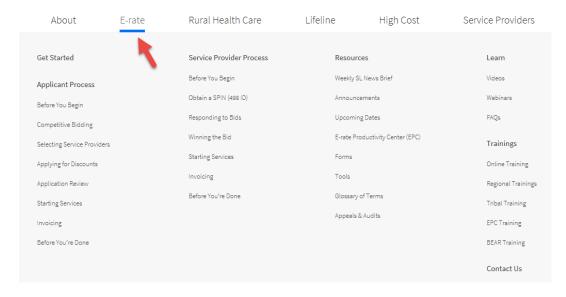
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Use of new E-rate section of the website will involve a learning curve. Much of the actual content remains the same, but the URLs and navigation have changed. Users who have bookmarked previous resources will find those links simply now redirected to the new E-rate homepage.

Obvious links to key resources on the homepage are limited to the broad categories of:

Resources Eligible Services List Tools Weekly SL News Brief Training Announcements

Less obvious are the more specific links that appear if you hover your mouse over the E-rate heading in the webpage banner. That action displays the following resource links:



Alternatively, for applicants missing the useful reference section of the earlier website, most filing resources can be found under the "Applicant Process" or "Service Provider Process" links in the "hover menu" shown above. The "Applicant Process" includes a list of steps and a flow chart covering the following:

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Applicant Process Before You Begin Step 1: Competitive Bidding Step 2: Selecting Service Providers Step 3: Applying for Discounts Step 4: Application Review Step 5: Starting Services Step 6: Invoicing Before You're Done

Each step can be expanded by clicking the \vee arrow. Step 2, for example, expands to provide the following links:



Another useful set of resources, again accessed from the "hover menu," is the "FAQs" (in the "Learn" column). FAQs currently cover the following topics:



One reason USAC gives for redirecting all earlier URL links to the new homepage is that the website's improved search capability will provide easy access to the required information. This remains to be seen. As a test — sparked by recent USAC reminders to applicants to update their Form 498s (see below) — we used USAC's new search capability to try to find website

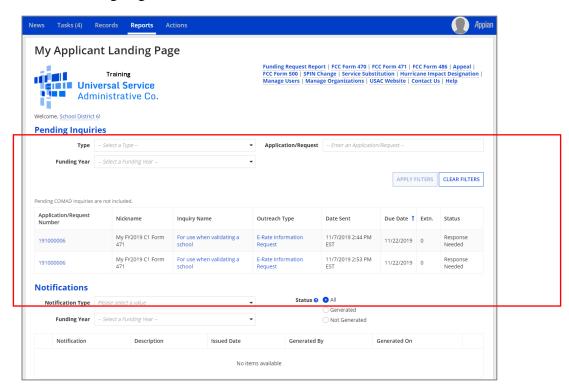
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information on the new requirement. A search for "Form 498 Update" yielded numerous Form 498 references, the most likely candidate being a link to "Manage Your 498 ID" that didn't mention the required update at all. By way of contrast, a similar search on the E-Rate Central website quickly highlighted all of E-Rate Central's Weekly News and USAC's News Brief references to the update requirement since last July. Admittedly we finally did find the Form 498 update information on the USAC site, but only after searching for the non-intuitive criteria "DATA Act," the underlying statutory requirement for the update. That "find" was the fifteenth in a list of search results that was not so helpfully labeled as an "Announcement" for service providers. We look forward to challenging USAC's search capability again when their new website is a bit more mature.

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

Pending Inquiries Grid for Applicants:

Also announced in its <u>November 8th News Brief</u>, USAC has added a "Pending Inquiries" grid on applicant EPC Landing Pages.



The grid provides a handy way for applicants to determine what USAC inquiries, if any, are outstanding with respect to pending Form 471s (i.e., PIA inquiries), Form 486s, Form 500s, appeals, SPIN Changes, or Service Substitutions. Two limitations of the new feature should be noted.

1. Invoice reviews (still handled in the legacy system) and COMAD inquiries will not be listed.

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2. The grid is applicant-specific. As such, it is not currently available — although it is apparently under development — in multi-applicant consultant and state coordinator EPC portals.

Form 498 Update Reminders:

USAC continues to reach out to applicants and service providers who have not updated their Form 498s to populate the new business type(s) filed in accordance with the Digital Accountability and Transparency Act of 2014 ("DATA Act"). Participants who missed USAC's soft deadline of October 31st report receiving reminder emails (and sometimes phone calls) — including last week's "Overdue" notice. The easiest way to avoid receiving these reminders — although there are scattered reports of unnecessary reminders — is to simply update the Form 498. The process must be completed by the entity itself, not a consultant, but is not difficult. Here are the five key steps:

- 1. Log in to EPC.
- 2. Select the "Records" tab, then "FCC Forms 498", select your Form 498, and click "Modify FCC Form 498."
- 3. Select business type(s) (up to three) in order of importance from the drop-down menu.
- 4. Click "Save and Continue" through the windows to continue to the certification page.
- 5. Review the data and select "Certify" to submit the updated Form 498.

One possible source of confusion for some applicants may be the appropriate selection of business type. Although USAC is apparently precluded from offering guidance on business type choices, we are more adventuresome and offer the following suggestions:

Regional ESA, library system,

or consortia: Choose "Regional Organization"

Public school districts: Choose "Independent School District"

Independent or charter school: If confirmed, choose "Nonprofit with 501C3 IRS

Status (Other than an institution of Higher Education)," otherwise choose "Other"

Individual library or branch: Choose "Other"

E-Rate Updates and Reminders

Upcoming E-Rate Dates:

November 19&21 Remaining USAC 2019 fall E-rate tribal training sessions.

November 22 Form 486 deadline for FY 2019 funding committed in Wave 14. More generally, the Form 486 deadline is 120 days from the FCDL date or the service start date (typically July 1st), whichever is later. Other upcoming

Form 486 deadlines are:

Wave 15 11/29/2019 Wave 16 12/06/2019

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Wave 17 12/13/2019 Wave 18 12/20/2019

FCC Reply Comments re. Form 470 Pull-down Menu Options:

Reply comments were due last week to the FCC's Public Notice (<u>DA 19-986</u>) seeking suggestions for improving the Form 470 drop-down menus — a source of confusion for many applicants since FY 2016. As discussed in our <u>newsletter of November 4th</u>, initial comments on the FCC proceeding were limited. The most complete and detailed response was submitted by the State E-Rate Coordinators' Alliance ("SECA"). <u>SECA's initial comments</u> built upon the FCC's proposed step-by-step EPC flow chart approach by reorganizing and expanding the steps and by suggesting additional clarifying language.

Last week's reply comments were also limited. Several parties, including EducationSuperHighway and the American Library Association ("ALA"), supported the SECA approach that, in turn, was further simplified in SECA's reply comments. The only substantive issue was a suggestion put forth in the initial comments by USTelecom—The Broadband Association and supported in reply comments by NTCA—The Rural Broadband Association to add a tab to the Form 470 to indicate the addresses of eligible entities — a suggestion deemed unnecessarily burdensome for Form 470 purposes in SECA's reply comments.

USAC News Brief Dated November 15 – Updated USAC Website Launch

<u>USAC's Schools and Libraries News Brief of November 15, 2019</u>, discusses the main features of USAC's updated E-rate homepage (see also the website navigation article above). The first section provides three path options: "Manage Your Account," "Resources," and "Upcoming Dates." The next section, "How It Works," contains program information on recipients and services. The final section on "Announcements" includes program notices on deadlines, SL News Briefs, and more.

The News Brief also indicates that service provider Form 474 invoices will be moved into the E-File system next month and an EPC fix is being planned to update entity profile county information.

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.

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