



**Before the
Federal Communications Commission
Washington, D.C. 20554**

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In the Matter of:)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
_____)	

**COMMENTS ON REVISIONS ON FCC FORMS 479, 486, AND 500
(DA 13-1636)**

The State E-Rate Coordinators’ Alliance (SECA) submits these Comments in response to the FCC’s Public Notice released July 24, 2013 (designated DA 13-1636) seeking comment on the proposed revisions to FCC Forms 479, 486, and 500.

Forms 479 and 486 Revisions:

SECA notes that proposed changes to Forms 479 and 486 are not substantive, so our comments on these two forms are minor in nature. SECA commends the FCC for condensing the CIPA waiver sections and for including a concise summary of CIPA requirements in the form instructions.

SECA believes, however, that one new sentence in Section II of the instructions for both forms needs to be clarified. It states: “Note that selecting a telecommunications carrier as a service

provider does not absolve schools and libraries of their obligation to comply with CIPA when they use that service to obtain Internet service or access to the Internet.” We believe that this is true only when applicants are applying for discounts on Internet service. Libraries, in particular, often request discounts on telecommunications services used to access the Internet, but avoid requesting discounts on those Internet services themselves so as to avoid CIPA requirements. At a minimum, we suggest a one word addition to the sentence to read: “Note that selecting a telecommunications carrier as a service provider does not absolve schools and libraries of their obligation to comply with CIPA when they use that service to obtain discounted Internet service or access to the Internet.”

Two minor suggestions for these forms are as follows:

1. The initial instruction on the Form 479 itself, advising the applicant not to submit the Form to USAC or the FCC, should also be prominently noted on Page 3, perhaps using the bold and capitalized instruction from Page 4 of the instructions.
2. Section IV (MINIMUM PROCESSING STANDARDS) of the existing Form 486 has been eliminated in the proposed revision. The second paragraph of the original section, however, is important for paper filers and should be retained, perhaps as the second paragraph of the revised Section IV (SPECIFIC INSTRUCTIONS).

Longer-term, if not in this form revision cycle, SECA encourages the FCC to consider making the Form 479 serve multiple funding years and to incorporate an LOA authorization.

Form 500 Revisions:

SECA appreciates the proposed changes to include service delivery extension requests and equipment transfer notifications functions to the Form 500. We have the following suggestions:

1. The instructions for changing the Service Start Date should explain the limitations on resetting the SSD to an earlier time following a previous reset for a late-filed Form 486.
2. The instructions for changing the Contract Expiration Date should make it clear that the applicant and service provider must have already formally extended the contract

expiration date, and that the Form 500 serves only to notify USAC that the contract has been extended.

3. Requesting a Service Delivery Extension by simply certifying one of two reasons would greatly simplify the request procedure. However, if USAC would then need to reach out for details in each case, the Form 500 should either provide a text box for explanation or request an explanatory attachment. If the check-off is sufficient, box can be reduced in size to eliminate excess blank spaces.
4. Neither the SLD's Reference Section nor the proposed Form 500 instructions discuss the transfer of equipment from a "partially" closed entity. The instructions should cover this situation. In cases involving temporary transfers, the instructions should also indicate whether or not a second Form 500 must be filed when the equipment is returned.
5. Minor corrections or suggested changes:
 - a. The first page needs a form designation, page number, and form date at the bottom. The Type of Adjustment box can be reduced in size to eliminate excess blank spaces.
 - b. If stapling of paper forms remains a problem in Kansas, the idea of printing "**DO NOT STAPLE**" in color at the top of the first page should be used on all other forms. It is not necessary, however, to include the same instruction (in any color) on subsequent pages of the Form 500.
 - c. The first reference to "FCDL" in the Block 1 instructions for both Items (1) and (2) should be "FCDL(s)."
 - d. Pages 2-4 are formatted at the top for "Page __ of __," but the instructions for adding additional page copies specify the use of page A, B, C, etc. designations. The "Page __ of __" is not needed on Page 6.
 - e. The instruction for Item (8) should indicate that a Form 500 is not needed to request a service delivery extension when USAC automatically extends the service delivery deadline, but that such a service delivery extension may require a Form 500 to notify USAC of an associated contract expiration date extension.
 - f. The format of Block 3, Item (9), should be reformatted as follows:

- i. The gray title area on the second column should read: “FRN(s) — List individually, or indicate “ALL” to cancel the entire FCC Form 471.” Individual entry lines on the table should be widened to accommodate multiple FRNs.
- ii. The gray title area on the second column should read: “Check below to cancel all FRNs on FCC Form 471.” Individual entry lines should include a checkbox and the words “Cancel ALL.”
- g. For Block 4, we suggest highlighting “**within three years**” in the on-form instructions. More space — or the phrase “attach additional page(s) if more space is needed” — should be added for listing Equipment Received.
- h. The instructions for Item (11) would read better and be less confusing by eliminating the phrase “even without receiving money or other consideration in return.”
- i. Block 5, Certification 13, also referenced in the instructions, does not appear to be required for purposes of the Form 500.

Respectfully Submitted by:

/s/ Gary Rawson

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