

# Council of the Great City Schools®

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Council of the  
Great City Schools®

## Member Districts

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March 6, 2015

Mel Blackwell, Vice President  
Schools and Libraries Division  
Universal Service Administrative Company  
2000 L Street, NW - Suite 200  
Washington, DC 20036

Jon Wilkins, Managing Director  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Mr. Blackwell and Mr. Wilkins:

The Council of the Great City Schools, the coalition of the nation's largest urban school districts, is writing to request a three-week extension of the Form 471 application filing window for E-Rate applicants. This change would move the filing deadline to April 16, 2015, which is approximately two weeks beyond the Good Friday and Easter holidays.

The Council appreciates the immense work done by the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC) over the last two years to modernize the E-Rate, increase transparency, maximize the program's cost-effectiveness and benefits for applicants, and make the application process as efficient as possible. We also appreciate the Commission's recognition in the December 2014 Order that the program changes will require adjustments for all stakeholders.

The result of the program upgrades enacted in 2014's two Orders is a new application process that required significant changes in the development of funding requests from applicants, as well as the deployment of a new online application system from USAC. This new application system requires increased data input from applicants, especially in this first funding year after the Commission's changes. E-Rate's large applicants, such as the school districts in the Council, are especially affected by the changes and the additional information that is now required to complete a funding request.

Our request for a three week extension of the Form 471 filing deadline results from our districts' intention to ensure they have sufficient time to align their requests with the changes enacted in the program and provide all of the required application information in a new online system. Providing more time for completion will help districts submit applications with fewer errors, and with less chance of their funding requests being deemed "unworkable" and requiring additional post-submission review and effort for USAC. A number of factors during the application process to date has caused major concern among our districts regarding their ability to meet the deadline, and in turn jeopardize their ability to deliver the benefits of the E-Rate program to students enrolled in their schools. A few examples of these factors include:

- The new online Form 471 requires much more data than in the past. Previously, an urban school district could input the total amount of the requested funding for the entire district on a single Internal Connections application, with a detailed price list from the contract. The changes to Category 2 funding in 2014 require individual school information be provided, and for large applicants, this means a substantial increase in the amount of data that must be entered.

- The Chicago Public Schools has more than 500 school sites, and has planned to apply for 250 schools this year. The new application requires the district to list more than 70 items on the Item 21 attachment and cost-allocate prices for each school. To do so, the district must select schools manually from the "Manage Recipients" screen and input the actual cost for each item at each school. In the case of Chicago, this results in 17,500 line items (70 items x 250 schools). Other methods of entering the data, such as creating 250 distinct FRNs for each school is equally labor-intensive and in both instances requires substantially more time than previous applications.
- The Los Angeles Unified School District has estimated that a network upgrade under the old application format required about one day to complete, with an Excel spreadsheet submitted to provide supporting information. In Funding Year 2014, the district's request for 200 schools was split into three applications and required about three days to complete all of the necessary information. The district has found that for Funding Year 2015, the new online system requires five to seven days per application to complete, due to the thousands of line item entries required for large applicants. Three applications for Internal Connections is now taking 15 to 21 days to complete, instead of the three days it did previously. This additional two to three weeks of staff time does not include the time and effort required to file additional applications for Category 1 and Basic Maintenance.
- A number of districts had to wait for their State to release data and guidance related to National School Lunch Program (NSLP) participation. This information was especially important for school districts that are using the new Community Eligibility Option (CEO) to determine poverty levels for individual schools.
- Districts must align their funding requests with the Commission's new requirements, as well as with existing state and local procurement rules. In many cases, this has required an extended bid process for Funding Year 2015, with many districts still receiving and reviewing quotes from service providers.
  - The Seattle Public Schools is in the midst of a six-year capital upgrade schedule. All large contracts for technology involve a lengthy local procurement cycle that meets or exceeds both the state and E-Rate standards. Once the Form 470 has been out for 28 days and the vendor is selected, the process may need review from three additional committees (Operations, Budget and Legal). The contract then moves to the district's School Board, where it must be introduced in a public session, followed by action at the next month's Board meeting. Two years ago, the district established the timeframe needed to get the procurement cycle, committee reviews, the Form 471 filing deadline, and Board approval to line up. The additional time that is now required to complete the new online application for the Form 471 has invalidated those initial assumptions, and an extension is necessary as the district works to remain on schedule.
- Once a vendor has been selected, school districts must have contracts approved by the school board. In large urban districts, monthly school board meetings are the norm, and the timing of service provider approval by the school board can often delay the input of the large amount of data that must now be entered in the new online Form 471.

- The extreme winter weather this year has also affected school districts around the country, and limited the amount of time that staff has been able to devote to completing their applications. Thousands of school districts have missed at least a week of work due to weather-related cancellations, and even more days have been lost in those areas experiencing record snowfalls. In the Northeast, the hard-hit Boston Public Schools have had 10 snow days in 2015.
- Many school districts have a scheduled Spring Break recess in the month of March, and the impact on district staff time and budgets is significant. Hillsborough County Public Schools in Tampa, FL, is on break from March 9-13, during which time district staff does not have access to any of the schools or office facilities. The Houston Independent School District is closed during the week of March 16-20. Both the Broward County Public Schools and the Miami-Dade Public Schools are closed during the week of March 23-27, when the existing filing window is scheduled to close. An extension of the Form 471 filing window would ease the budget pressure that personnel and overtime costs that the new application has caused for these and many other school districts.

The Council would also note that there is ample precedent for an extension. The Form 471 filing window was extended by three weeks in Funding Year 2003 due to “concerns from the applicant and service provider communities” about new technology for the form, a situation very analogous to this year. (*See the 12/2/2002 News Update from USAC titled, “FY2003 Filing Window Extended Three Weeks to February 6, 2003”*) There have also been numerous extensions granted over the years due to extreme weather which resulted in school and district closures that jeopardized the timely submission of funding requests.

The Council is very appreciative of the consideration given to this request by the Administrator and the Commission. Our organization and our member school districts were active participants in the E-Rate modernization effort, and remain grateful for the thoughtful outreach and deliberation that was given to urban schools during the numerous meetings, public filings, and site visits that occurred. We remain supportive of the goals laid out by the Commission for the updated E-Rate program, and would like the opportunity to get our applications right.

If you have any questions or would like any additional information about our request, please do not hesitate to contact me or Manish Naik on my staff. Thank you.

Sincerely,



Michael Casserly  
Executive Director