

E-RATE CENTRAL COMMENTS REGARDING
THE INFORMATION TECHNOLOGY SYSTEMS MODERNIZATION
OF THE SCHOOLS AND LIBRARIES PROGRAM
OF THE UNIVERSAL SERVICE FUND

E-Rate Central is pleased to provide the following comments on the proposed modernization of the SLD's IT system(s), and to offer whatever assistance may be requested during the design and implementation phases.

General:

USAC's notice requesting comments and the SLITM Draft Statement of Work together provide a good overview of the proposed IT system modernization project, including the functional components of the E-rate program.

The stated project objectives — leverage technology, keep it simple, make it easy to use, effectiveness, efficiency, engaging, error-free, and ease of learning — are good, but very generic. Neither document provides many details on the real system requirements. As outlined further below, E-Rate Central believes that portals — for applicants, consultants, and service providers — should be keys elements of the system design.

The lack of detail in the SLITM Draft Statement of Work suggests that the real design work is to be the first deliverable. A modern and effective IT system is unlikely to be achieved by making incremental improvements to the existing system(s). A complete redesign is required. If the Contractor is to be charged with designing the system, essentially from scratch, the project schedule is highly optimistic.

Best Practices:

Section A.4.A of the SLITM Draft Statement of Work indicates that the Contractor shall apply the "best practices of the industry." Our question is: what "industry?" If the SOW is referring solely to the best practices of the IT industry, then this requirement is obvious.

Hopefully, however, USAC and/or the Contractor will investigate and apply the best practices of the E-rate industry, broadly defined. This means:

1. USAC needs to explicitly establish what parts and/or functions of its existing systems are currently working well, and which are not.
2. USAC and/or the Contractor need to spend time examining the E-rates support systems which have been developed by experienced applicants, consultants, and service providers.

System design should be an iterative process reflecting both user needs and tradeoffs. Too often, we have seen design teams collect “wish list” requirements, go off by themselves to develop a system, then deliver a bloated and unworkable product. E-Rate Central suggests that USAC consider the formation of a small applicant/consultant/service provider task force to help guide and review system design objectives and plans throughout the development process.

The SLITM Draft Statement of Work contains several references to User Acceptance Testing, but does not define “user.” E-Rate Central believes that the SOW should explicitly incorporate the need for user testing, not just by USAC, but by the broader E-rate applicant, consultant, and service provider communities.

E-Rate Central would be pleased to work with the SLITM development team to: (a) share the features and functions of its own internal E-rate systems; (b) serve on a design task force; and/or (c) participate in user testing.

Suggested Areas for Improvement:

The following outline merely highlights some of the specific functions that E-Rate Central believes should be incorporated into the SLITM design.

1. Develop an applicant portal, accessible and modifiable online, incorporating:
 - a. All contact and authorized signer information
 - b. Consultant LOA information, including delegated authority by consultants to manage all or a portion of the applicant portal
 - c. Previous year forms suitable for duplicating as drafts for future filings
 - d. Service requirements and procurement procedures (which might substitute for Form 470 filings)
 - e. Correspondence logs
 - f. Expanded applicant upload capability, perhaps with Web service capability, including
 - i. Block 4 uploads should permit multiple worksheets in one pass
 - ii. Add Block 5 and Item 21 uploads
 - iii. Longer-term goal should be to permit upload of entire applications

- g. Priority notification system for applicants providing e-mail addresses (with the right to restrict access to USAC only to avoid spam problems)
 - h. Expanded online filing capability, including:
 - i. Online templates for submission of RAL/RNL corrections, appeals, service substitutions, SPIN changes, and common requests
 - ii. Online Form 500, or equivalent capability, for changes to SSD and CED notifications and FRN cancellations and reductions
 - i. Expanded transparency on pending application review status
 - j. Revised notification procedures, specifically with regard to 470/No-471 and missing Item 21 attachment warnings
2. Develop a consultant portal, accessible and modifiable online, incorporating:
 - a. All consultant contact information
 - b. Authorized link/access to client applicant portal
 - c. A single consultant PIN
 3. Develop a service provider portal, accessible and modifiable online, incorporating:
 - a. All service provider contact and banking information, eliminating need for Form 498 updates
 - b. Links to all invoice filing and status information
 - c. Link to remittance information in applicant portal for BEAR payment purposes
 - d. Link to improved SPIN Contact database, including:
 - i. Searchable by partial names including formal, d.b.a., a.k.a., and f.k.a. names
 - ii. Expanded contact information to include fax, e-mail and Web addresses
 4. Reorganize the DRT into a single integrated database
 - a. Replacing, as of FY 2013, at least $55 \times 16 = 880$ separate files
 - b. Standard report formats need to be redesigned, including tools to provide summary status information for state E-rate coordinators
 - c. Expand internal FRN transactional database to provide public access
 - d. Third-party downloads need to be more efficiently available with Web service capability
 - e. External Web service access should also be available to other USAC databases including Form 470s, Form 471 displays, SPIN and Contacts, etc.
 5. Improve invoicing system, including:
 - a. Online BEAR remittance contact database, modifiable online by applicants, for service provider use (see applicant portal)

- b. Fix the online BEAR process to require certification at the end of the process, not the beginning
 - c. Replace or supplement the Quarterly Disbursement Report system to provide online and downloadable reports showing both authorizations and disbursements
 - d. Flag zero-paid BEARs and SPIs (and minimize number by encouraging pre-denial outreach on obvious M&C errors)
6. Integrate system with certain FCC systems, including
 - a. Improved search capability for FCC orders and appeal decisions
 - b. Status information on pending FCC appeals
 - c. Red Light condition reporting, particularly involving non-E-rate issues
 7. Redesign and restore the Eligible Products Database and/or make the Service Matrix database available for public access.
 8. Establish whistleblower system/procedures to prioritize and systemize action steps
 9. Other design requirements
 - a. Unless funding problem is resolved, design system to handle proration of Priority 2 funds and/or prioritization of Priority 1 funds. System might also need to handle over-commitments to take advantage of ADA exemption
 - b. Upgrade of general site search capability
 - c. Permit greater use of "As Yet Unfunded" status

Submitted by,



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