

## Schools and Libraries

# NEWS BRIEF

November 22, 2013

**TIP OF THE WEEK:** Start now to plan the steps you must complete in order to timely file your FY2014 FCC Forms 470 and 471. Remember that the FY2014 application filing window will open January 9, 2014 at noon EST and close March 26, 2014 at 11:59 PM EDT.

Please note that USAC will not issue a News Brief next Friday, November 29, due to the Thanksgiving holiday. Also, the Client Service Bureau will be closed Thursday, November 28 and Friday, November 29.

### Commitments for Funding Years 2013, 2012, and 2011

**Funding Year 2013.** USAC will release Funding Year (FY) 2013 Wave 28 Funding Commitment Decision Letters (FCDLs) November 27. This wave includes commitments for approved Priority 1 (Telecommunications Services and Internet Access) requests at all discount levels. As of November 22, FY2013 commitments total over \$1.37 billion and encompass 30,095 of FY2013 applications.

**Funding Year 2012.** USAC will release FY2012 Wave 70 FCDLs December 2. This wave includes commitments for approved Priority 2 (Internal Connections and Basic Maintenance) requests at 90 percent and denials at 89 percent and below. As of November 22, FY2012 commitments total over \$2.81 billion.

**Funding Year 2011.** USAC will release FY2011 Wave 105 FCDLs December 2. This wave includes commitments for approved Priority 2 requests at 88 percent and above and denials at 87 percent and below. As of November 22, FY2011 commitments total just under \$2.64 billion.

On the day the FCDLs are mailed, you can check to see if you have a commitment by using USAC's [Automated Search of Commitments](#) tool.

### FY2013 FCC Form 486 Deadline Reminder

Yesterday, November 21, USAC issued just under 1,080 FCC Form 486 Urgent Reminder Letters for FY2013 Funding Request Numbers (FRNs). These letters are sent to remind affected applicants that their FCC Forms 486 appear to be late, and that they have 20 days from the date of the letter to file and certify their forms.

- An FCC Form 486 appears to be late for an FRN if no FCC Form 486 has been certified and it has been more than 120 days after the date of the FCDL or more than 120 days after the service start date reported on the FCC Form 471, whichever is later.
- An FCC Form 486 filed online but not certified will still cause a letter to be issued. **You must certify your form before the deadline to avoid a penalty (see below).**
- USAC will issue these letters going forward for FY2013 as new FRNs meet the above conditions.
- USAC will also continue to issue these letters for FRNs from previous funding years that meet the above conditions.

If the date of your FCDL is before July 17, 2013, and your service start date is also before July 17, 2013, you must file an FCC Form 486 on or before **December 11, 2013**. Going forward, you should file your FCC Form 486 after you receive your FCDL and services start – in any case, no later than the deadline featured in your FCC Form 486 Urgent Reminder Letter.

Remember that, if your FCC Form 486 is received or postmarked after the deadline, USAC will reset your service start date to the date 120 days before the date your form was received or postmarked, which may result in a reduction in your funding commitment. For more information, refer to [FCC Form 486 Filing](#) and the [Deadlines](#) tool on the USAC website.

## **APPLICATION PROCESS: Technology Planning and the FCC Form 470**

In [last week's SL News Brief](#) we discussed technology planning. It is also important to keep in mind the relationship between the technology plan and the FCC Form 470. (The [FCC Form 470, Description of Services Requested and Certification Form](#), is the first program form filed in the application process.) Below are several questions that you should consider as you write your technology plan and prepare to file an FCC Form 470.

Remember that, beginning with FY2011, technology plans are required only for Priority 2 services – i.e., Internal Connections and/or Basic Maintenance of Internal Connections.

### **What is the relationship between the technology plan and the FCC Form 470?**

Your technology plan, if properly done, forms the basis for the acquisition and use of the products and services featured on your FCC Form 470. By describing your current and future needs and your goals and strategies for using technology, you can prepare reasonable funding requests and evaluate and monitor your progress toward reaching your technology goals.

The services you request on your FCC Form 470 should follow from your goals and strategies and your current and future needs as described in your technology plan. This helps to ensure that the products and services for which E-rate provides discounts will be put to good and effective use.

### **How do I avoid an overly broad FCC Form 470?**

An overly broad or "encyclopedic" FCC Form 470, instead of being tailored to your technology plan, covers a wide and unconnected range of services that may be eligible for discounts but that do not necessarily advance or support the specific goals and strategies articulated in that technology plan.

Your FCC Form 470 should reflect instead a level of detail appropriate to the size and complexity of your technology plan and feature services that you actually plan to use. Your entries in the "Service" and "Quantity and/or Capacity" fields on the FCC Form 470 should be consistent with both the overall goals and the specific details included in your plan.

### **How long and how detailed should my technology plan and FCC Form 470 be?**

There is not a minimum or maximum requirement for the length or complexity of a technology plan. We suggest that you keep the following general guidelines in mind:

- A small entity or an entity with limited technology needs will probably have a smaller, less complex technology plan than a large entity or an entity with more complex technology needs.
- Your current situation may affect the detail and the degree of complexity in your technology plan and your FCC Form 470. For example, a school with no infrastructure in place could explore a variety of technological solutions, while a school planning a buildout of an existing infrastructure might have more limited options because of compatibility issues with its existing equipment.
- [Technology Plan Approvers \(TPAs\)](#) can set requirements of their own for the technology plans that they approve. For example, TPAs may add requirements to ensure that the technology plan complies with the requirements of other federal or state programs in addition to E-rate.

You should also make sure your technology plan is not overly narrow but could cover more than one solution to your needs. That way service providers that might not otherwise bid on your services may be encouraged to offer cost-effective solutions you may not have considered.

### **What effect should my needs assessment have on my FCC Form 470?**

The needs assessment element of your technology plan should address more than just the number of computers or other hardware you already have or intend to acquire in order to make use of discounted services. For example, an old building with limited electrical capacity may not be able to support your requests for services unless you first make substantial modifications to its electrical system. If this is the case, upgrading your infrastructure may precede your request for all of the services you have included in your technology plan and your FCC Form 470 should take this into account.

### **How specific should I be about the scope of my project?**

When completing your FCC Form 470, you should give service providers an accurate understanding of the scope of your project. For example, if your school district is either growing or shrinking rapidly, or your school district comprises many schools and not all the schools will share all services, you should make that information clear in your FCC Form 470 and may want to include that information in your technology plan as well.

The Quantity and/or Capacity fields on the FCC Form 470 could therefore be simple or very detailed, depending on the information you need to convey to potential bidders.

### **What effects could minor or major changes to my technology plan have on the FCC Form 470 I already filed?**

Minor revisions or updates are those that remain within the scope of the original version of the technology plan and any related FCC Forms 470. Program rules do not require minor revisions or updates to be re-approved, but you should check with your TPA to see if he or she has other requirements.

Major revisions or updates are those outside of the scope of the original version of the technology plan and/or the FCC Form 470. A major revision would require the issuance of a new FCC Form 470 because the provision of the new or expanded products and/or services is significant enough to require a new competitive bidding process. If you intend to make a major revision or update to your technology plan, talk to your TPA.

As you get ready to file your FCC Form 470, you should review any revisions or updates that you have made to your technology plan and consider any other changes that may be necessary. If you have revised or updated your technology plan, don't just copy the FCC Form 470 you filed last year. Think first if those revisions or updates will affect the FCC Form 470 you file for the upcoming funding year.

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