



Universal Service  
Administrative Co.

# Schools and Libraries Program News Brief

December 2, 2016

**TIP OF THE WEEK:** We encourage you to file your FCC Form 486 if USAC has issued you one or more funding commitments. Remember that USAC cannot pay invoices submitted by you or your service provider if we do not have a certified FCC Form 486 approved and on file.

## Commitments for Funding Years 2016 and 2015

**Funding Year 2016.** USAC released Funding Year (FY) 2016 Wave 23 Funding Commitment Decision Letters (FCDLs) on November 28 and is scheduled to release Wave 24 FCDLs on December 5. These waves include commitments for approved applications for all service types and at all discount levels. As of December 2, FY2016 commitments total over \$1.14 billion.

On the date the FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in the E-rate Productivity Center (EPC).

**Funding Year 2015.** USAC will release FY2015 Wave 71 FCDLs on December 7. This wave includes commitments for approved requests for all service types and at all discount levels. As of December 2, FY2015 commitments total over \$3.31 billion.

The day after the wave runs, you can check to see if you have a commitment by using USAC's [Automated Search of Commitments](#) tool. FCDLs for FY2015 will continue to be printed and mailed to applicants and service providers, and emailed to service providers who have signed up to receive electronic notifications.

## Category One, Category Two, and the Definition of "Campus"

When applying for funding, you should remember that the E-rate program has a very specific definition of "what a school or library campus" is which may impact the category of services you are seeking. The [FY2017 Eligible Services List and its Frequently Asked Questions Appendix](#) provided an explanation of the term "campus" based on the FCC's definition of internal connections and Wide Area Networks (WANs).

These definitions are important because a connection will be classified as a Wide Area Network eligible for Category 1 (C1) funding if it connects different schools or libraries, or different campuses within a school or library. It will be classified as an internal connection eligible for Category 2 (C2) funding if it is confined to one school or library on a single campus. The pre-discount cost of C2 services count against an entity's five-year C2 budget.

In this issue, we will first discuss the definition of campus and then provide examples of C1 and C2 connections.

### Definition of campus

A "campus" is defined as the geographically contiguous grounds where the instructional buildings of a single eligible school or the non-administrative buildings of a single eligible library are located.

We recognize that not all schools and libraries fit this situation. The following two examples illustrate other possible scenarios:

- A single school may have multiple campuses if it has instructional buildings located on grounds that are not geographically contiguous. Similarly, a single library may have multiple campuses if it has non-administrative buildings located on grounds that are not geographically contiguous.
- Different schools or libraries located on the same grounds do not comprise a single campus for the purposes of the E-rate program. The portion of the grounds occupied by the instructional building(s) for each school is the campus for that school. Similarly, the portion of the grounds occupied by the non-administrative building(s) for each library is the campus for that library.

"Geographically contiguous" grounds are grounds that are not physically separated. For example, grounds that are not divided by a stream or a road.

- A road may divide property, creating distinct edges that are not touching, and thus render the grounds on either side of the road "not geographically contiguous." A stream or similar division would have the same effect.
- Whether a road is a public right-of-way is irrelevant, because public rights-of-way no longer determine C1 or C2 eligibility. The rebuttable presumption that a connection that crosses a public right-of-way is not an internal connection was eliminated from this definition starting in FY2016.

### **Delineating separate campuses on non-contiguous grounds**

Schools or libraries that wish to delineate separate campuses should document their bases for considering different grounds to be separate campuses, including why they are not geographically contiguous, and observe the delineation consistently.

- However, if a single school or library defines two parts of geographically contiguous grounds as different campuses for its own administrative purposes, the geographically contiguous grounds will nonetheless be treated as one campus for the purposes of the E-rate program and the connection will be eligible for C2 support.

### **Determining whether a connection is eligible for C1 or C2 support**

Now that we have defined "campus," we can use the definition to determine whether certain kinds of connections are C1 or C2.

#### **1. Connections on a single campus between multiple instructional buildings of a single school campus or within one or more non-administrative buildings that comprise a single library.**

Some schools and libraries have multiple buildings on one campus. Connections between multiple instructional buildings of a single school or multiple non-administrative buildings of a single library that are located on a single campus (i.e., contiguous grounds that are not separated by a road, stream, or other clear division) are eligible for C2 support.

Examples of these C2 connections include:

- Connections between multiple instructional buildings of a high school all located on the same campus (geographically contiguous grounds).
- Connections between multiple non-administrative buildings of a public library located on both sides of a small driveway (geographically contiguous grounds).

#### **2. Connections on different campuses between multiple buildings of a single school or single library.**

Occasionally, the same school or library may have buildings on multiple campuses. Connections between multiple instructional buildings of a single school or multiple non-administrative buildings of a single library that are located on non-contiguous grounds that have been defined by the applicant as separate campuses are eligible for C1 support.

Examples of these C1 connections include:

- A connection between two instructional buildings of a middle school that are located on both sides of a major thoroughfare. The middle school has administratively defined the grounds on one side of the thoroughfare as "Campus A" and the separate and distinct grounds on the other side as "Campus B."

#### **3. Connections between two or more different schools or libraries located in the same or in**

## different buildings.

A connection between two or more different schools or libraries – and therefore between campuses - is eligible for C1 support. Connections between different schools or libraries are C1 connections regardless of whether they are located on the same grounds or in the same building. If they are located on the same grounds or in the same building, the portion of the grounds occupied by the building(s) for each school or library is the campus for that school or library.

Examples of these C1 connections include:

- A connection between an elementary school and a middle school regardless of the distance between them.
- A connection between a public library and a research library (considered separate libraries by the state library administrative agency) that occupy different floors of the same building is eligible for C1 support. Each library is considered to have its own campus.
  - Note: If the public library is located on three floors of that building, the connections between *those* floors are eligible for C2 support.
- An elementary school, a middle school, and a high school share a single building, but do not share any classrooms. The connections between the schools are eligible for C1 support.
- Three separate schools share a single building and also share classrooms. The connections to the shared classrooms are eligible for C2 support. The schools must allocate costs pursuant to their established, program-compliant method for shared services.

If you have any questions, you can open a customer service case in EPC or call the Client Service Bureau (CSB) at 888-203-8100.

## Applying for a Deadline Extension for Fiber FRNs that Receive a Late FCDL

Applicants may only receive funding for special construction charges associated with a self-provisioned network or dark fiber lease if the fiber is used or lit within the same funding year (i.e., by June 30). Starting with FY2016, program rules allow applicants to receive up to a one-year extension to begin using the network or light the fiber if they demonstrate that construction was unavoidably delayed due to weather or other reasons.

If you are not able to use or light the fiber within the funding year, you must complete an [FCC Form 500](#) and request a service delivery deadline extension and provide the reason(s) for the delay, e.g., a late FCDL.

- If you are filing an FCC Form 500 on paper (before the form is available online in EPC), attach an explanation to the paper form that provides the reason(s) for the delay.
- If you are filing an FCC Form 500 in EPC, the form will include a text box for you to provide this information.

If you receive an FCDL on or after March 1, 2017, you must still submit a service delivery deadline extension request by submitting an FCC Form 500. You do not receive an automatic extension of this deadline simply because your FCDL was issued on or after March 1.

### Last Week in "File Along with Me":

"File Along with Me" is a blog that covers the E-rate Program application process step-by-step, and serves as a schedule you can follow to manage your application. Ready to join us? [Read the Blog](#)

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