Universal Service Administrative Co.

Schools and Libraries Program
News Brief

March 10, 2017

> **TIP OF THE WEEK: You have less than five weeks to certify your FCC Form 470 in EPC for FY2017.** April 13, 2017 is the last possible day to certify an FCC Form 470 and still be able to certify an FCC Form 471 within the filing window.

Commitments for Funding Years 2016 and 2015

Funding Year 2016. USAC is scheduled to release Funding Year (FY) 2016 Wave 38 Funding Commitment Decision Letters (FCDLs) on March 16. This wave includes commitments for approved applications for all service types and at all discount levels. As of March 10, FY2016 commitments total over $2.34 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 74 FCDLs on March 17. This wave includes commitments for approved requests for all service types and at all discount levels. As of March 10, 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.

Top Ten Window Tips

To help you to file successfully for discounted services for the FY2017 application filing window, pay attention to the following tips. Each tip contains one or more hyperlinks to additional information.

1. Familiarize yourself with the application process.

- Review the application process flow chart. You can find this chart in the Before You Begin section of the USAC website. It contains high-level information about the entire process for both applicants and service providers and will help you understand what you need to do and when.
- Read through the applicant process steps. Each step in the process is summarized in that step's description, and you can find more details on each step by clicking on the hyperlinks provided within the text.
- Practice filing forms. USAC has an EPC training site for applicants to use for both training and practice filing forms. The training site page includes a request form for logins and instructions for setting up your test entity.

2. Create and/or delete users in your organization's EPC account.

- From your landing page in EPC, your account administrator can create new users in your account and delete users who are no longer with your organization. You need at least one user who has full rights — that is, who can create, update, and certify program forms. (Partial-rights users can create and update but not certify forms.)

- Even though most profile information is locked for the filing window, account administrators can change levels of rights for their users.
- Note that you also need to assign rights to other activities and forms in addition to the FCC Forms 470 and 471 (e.g., rights to submit post-commitment change requests and complete or certify FCC Form 498).

3. Review the process and requirements to apply for newly eligible fiber.

- Starting with FY2016, applicants could apply for certain fiber services that were not eligible before. Those newly eligible fiber services come with additional program requirements – for example, if you post for bids to lease and light dark fiber, you must also post for the provision of those services over lit fiber so that you can compare the offerings and choose the most cost-effective solution. Review the following documents on the USAC website before you file your FCC Form 470:
  - Fiber FAQs
  - Fiber
  - Fiber Requirements
- Applicants whose states agree to provide up to ten percent of the cost of special construction projects may qualify for an equal match of funds in addition to the discount amount approved by USAC. Review the State Matching Provision page on USAC's website if this could apply to you.
- Make sure you follow all the program requirements in the guidance documents listed above if you are applying for newly eligible fiber. To get additional help, contact our Client Service Bureau (CSB) by opening a customer service case in EPC or calling 888-203-8100.

4. Run an open and fair competitive bidding process.

- File and certify an FCC Form 470 to open your competitive bidding process. You should be able to accept bid responses to the services you request on your form. Note that you do not have to certify an FCC Form 470 if an existing contract covers your services (multi-year contract, contract with an exercised voluntary extension, or a state master contract where the state filed the establishing FCC Form 470) or for business class, commercially available low-cost, high speed Internet access. See last week's SL News Brief and Step 2 - Responding to Bids for details on these contracts and services.
- Attach your Request for Proposal (RFP) and RFP documents to your FCC Form 470 when you file it. We use "RFP" generically to refer to any official procurement document similar to an RFP, and "RFP document" to refer to any document you produce that gives potential bidders more information about your services and competitive bidding process than you include on your FCC Form 470.
- Be ready to answer questions from potential bidders. Post those questions and your answers to your website or other location of your choosing so that all potential bidders have access to the same information. Be sure to also post those documents to your certified FCC Form 470, as well as any other RFP documents you issue after you certify your form. Refer to the February 4 SL News Brief for guidance on posting RFP documents to a certified FCC Form 470.

5. Wait your 28 days.

- You must wait a minimum of 28 days before selecting your service provider, signing a contract (if applicable), and completing and certifying your FCC Form 471. You can wait longer, but do keep the FCC Form 470 and 471 deadlines in mind.
- If you make a minor change to your project or the services you are requesting that is within the scope of your original FCC Form 470 and/or RFP, consider restarting your 28-day clock. You do not need to certify a new FCC Form 470 (you can add one or more RFP documents explaining the minor change), but you would have to track your new 28-day deadline yourself. However, if you make a fundamental or cardinal change, such as adding new services or enlarging your project beyond the scope of your original FCC Form 470 and RFP, you must certify a new form and include those changes on your FCC Form 470 and RFP documents.
- Do not delay. April 13, 2017 is the last day you can certify your FCC Form 470, meet the 28-day competitive bidding requirement, and certify your FCC Form 471 within the application filing window.

6. Review your contracts.

- A signed contract is the best evidence of a legally binding agreement. If you have something other than a contract, be prepared to explain why it is a legally binding agreement.

- Consider memorializing in your contract the details related to receipt of discounted services that you have agreed upon with your service provider – for example, specifying the invoicing method you will use. (Will you pay for your services in full and invoice USAC yourself, or will you pay discounted bills from the service provider?) See Step 6 - Invoicing for more information about invoice options.
- For any new contract, create a contract record in your organization's profile in EPC. (You can do this even though your profile is locked.) Contracts with voluntary extensions do not require a new contract record – simply work with your service provider to extend the contract and then, in the appropriate fields on your FCC Form 471 funding request, cite the existing contract record and report the new expiration date.

7. File your FCC Form 471.

- Answer the connectivity questions for your schools or for your libraries in your organization's profile in EPC. If you answered the questions last year, review your answers to make sure they are still accurate.
- Talk to your service provider about the products and services that will be featured on your form. For applicants with more than 20 entities or for complex service requests, consider asking your service provider if they can assist you with the bulk upload templates. These templates can be completed and then uploaded to the form rather than completing the funding request information manually within the form.
- Remember that the filing window will close at 11:59 PM EDT on Thursday, May 11, 2017 with or without your certified form. Plan now to get it in on time.

8. Retain and file all program-related documentation.

- Create a method for archiving and storing your program documents where you and others in your organization can find them. Examples of documents you should store now – while you still know where they are – include:
  - RFPs and RFP documents
  - Receipt Notification Letter (RNL) modifications to FCC Form 470
  - Bids received, both winning and losing – note that service providers are not required to keep losing bids but applicants are
  - Completed bid evaluation sheets
  - Contracts and legally binding agreements
  - Receipt Acknowledgment Letter (RAL) modifications to FCC Form 471
- You can store documents electronically – you are not required to keep paper copies.
- Remember that you must keep all program-related documentation for at least ten years after the later of the last day of the applicable funding year or the service delivery deadline for the funding request.

9. Prepare for USAC's review of your application.

- Program Integrity Assurance (PIA) may need to ask you to answer questions or provide additional documentation. Monitor your email for notices of outstanding PIA questions, click the link in the email to review the questions, and respond promptly and completely. If you cannot respond to the questions within 15 days, you can request and receive an automatic 7-day extension. (Additional extensions require manual review and approval.)
- Alert your service provider(s) that you may need help with some PIA questions, especially those related to the services they provide.
- Review your FCC Form 471 for accuracy. If you see information that is incorrect or incomplete, submit a RAL modification. Be prepared to show documentation in case PIA needs to verify that the correction is a ministerial or clerical error and not information that changed after your form was certified. Refer to the April 29, 2016 SL News Brief for guidance on submitting a RAL modification.
- If your contact information changes or someone else can answer review questions on your behalf, update your holiday/summer contact information through a RAL modification.
- Have your supporting documentation ready. Examples of documentation that PIA may ask to review include:
  - Support for your discount calculations – for example, approval of your Community Eligibility Provision (CEP) percentage, copies of income surveys, or documentation of sibling matches. See Alternative Discount Mechanisms on the USAC website for more information.
  - Evidence of your open and fair competitive bidding process – copies of RFPs and RFP documents, winning and losing bids, completed bid evaluation sheets.

- Copies of your contracts and legally binding agreements, if you did not upload copies to the contract records you created in your profile.
- Network diagrams, service descriptions, and other information your service provider can supply.

10. Know where to go for help.

- Client Service Bureau (CSB)
    - CSB is open from 8:00 AM to 8:00 PM ET Monday through Friday. CSB will be open additional hours during the last week of the window, but we suggest that you start your application process early so that you do not need to call them at the last minute.
    - You can also open a customer service case in EPC. In a customer service case, you can type your question, upload files, or submit a case after regular hours for CSB to work through on the following business day. You will have access to the case if you designate yourself as the contact person, and you can monitor the case for USAC's answer or to see if your request has been completed.
- USAC website
    - The applicant steps – and their hyperlinked webpages – provide both general and detailed guidance on the E-rate program.
    - The Online Learning Library contains how-to videos and form walkthroughs that you can watch for help with specific actions. The form videos in particular are helpful if you have two screens or can toggle (Alt+Tab) between two programs on one screen. Using either of these methods, you can watch a section of the video, pause it, work on that section of your form, then return to the video and continue watching.
    - You can also find user guides for FCC Form 470 and for FCC Form 471.
- SL News Brief
    - Receive program information by subscribing to our weekly newsletter, the Schools and Libraries News Brief. We provide up-to-date information on the E-rate program, including upcoming funding commitment waves, recent developments, and timely program guidance.
    - We encourage you to subscribe to the SL News Brief from more than one email address if that is more convenient for you.

Now that the window is open, we encourage you to follow our tips, file early, and be prepared.