FUNDS FOR LEARNING.
YOUR E-RATE GUIDES

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January 27, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: _Ex Parte Communication_
Modernizing the E-rate Program for Schools and Libraries -- WC Docket No. 13-184
Schools and Libraries Universal Service Support Mechanism -- CC Docket No. 02-6

Dear Ms. Dortch:

On January 17, 2018, Cathy Cruzan, President of Funds For Learning, and I met with FCC staff to share our analysis of FY2017 E rate funding data and the responses to a nationwide survey of E-rate applicants. The following are the FCC Telecommunications Access Policy Division (TAPD) staff with whom we met:

Ryan Palmer, Division Chief, (TAPD)
Elizabeth Drogula, Deputy Division Chief (TAPD)
James Bachtell, Attorney Advisor, TAPD (via telephone)
Bryan Boyle, Attorney Advisor, TAPD
Kate Dumouchel, Attorney Advisor, TAPD

Cathy Cruzan and I also met with Mark Stephens, Managing Director, and Cara Voth, Counsel, Office of the Managing director; and, in a separate meeting, I met with Travis Litman, Commissioner Rosenworcel's Chief of Staff and Senior Legal Advisor.

In these meetings, we shared that over 118,000 school and library sites benefit from the E-rate program. This impacts over 50 million K-12 students and millions of library patrons each year. We commented that 93% of respondents to our survey said that Wi-Fi is critical to fulfilling their organization's mission; 84% of respondents to our survey indicated that the E-rate program is vital to their organization's Internet connectivity goals; 78% of respondents believe that they have faster Internet because of the E-rate program; and 75% of respondents expressed the opinion that they have more students and library patrons connected to the Internet as a direct result of E-rate discounts.

Other major observations that we offered, included:

- The total annual impact of E-rate discounted services currently exceeds $4.5 billion. (pg 9)

- The decline in participation that began in 2015, as measured by the number of sites supported by the program, has slowed. We forecast steady participation in 2018. (pg 10)

- Although the demand for broadband connectivity has grown significantly the past five years, the amount of E-rate funding requested for broadband has remained flat. (pg 11) Applicants have benefited from lower pricing driven by the bidding process and new competition.

- The decline in funding requests for on-campus Wi-Fi (pg 11) does not reflect real world demand for connectivity; instead, this phenomenon is likely a reflection of three converging elements: (1) the phase-down in support for voice services, the reimbursements from which many applicants used as a source of funding for Wi-Fi projects; (2) the difficulty using the online EPC application tool, and (3) the size and implementation of the C2 budget caps.

- 24% of respondents expect their broadband Internet needs increasing by 100% or more in the next three years. Only 10% anticipate no change in their broadband needs. (pg 15)

- 82% of school respondents and 63% of library respondents believe that the Category 2 budget cap should be increased. (pg 16)

- 55% would reinstate discounts for voice telephone service. (pg 17)

- 88% agree that C2 budgets should be administered at a district/library system level. (pg 18)

- 77% believe secondary Internet connections should be eligible for discount. (pg 18)

- 73% agree that inadequate off-campus Internet is a major issue in their community. (pg 18)

- 24% are likely, or somewhat likely, to consider a self-provisioned network. (pg 19)

- 81% agree the E-rate is ensuring affordable access broadband (pg 21)

- 63% agree the E-rate is maximizing the cost-effectiveness of eligible purchases. (pg 21)

- 33% agree the E-rate is fast, simple and efficient. (pg 21)

Of the many comments provided by survey respondents, there is one that perhaps best captures the sentiment of applicants: "Very thankful for the E-rate program; despise the EPC." (pg 48)

The full report is included as an attachment to this letter.

Respectfully submitted,

/s/ John D. Harrington

John D. Harrington

Chief Executive Officer
Funds For Learning, LLC
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Edmond, OK 73013

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Attachment: FY2017 E-rate Trends Report

cc: Mark Stephens
        Travis Litman
        Ryan Palmer
        Elizabeth Drogula

2017 E-RATE TRENDS REPORT
by Funds For Learning®

A NOTE FROM JOHN HARRINGTON

LOOKING AT THE 2017 REQUEST DATA

THE 2017 APPLICANT SURVEY

APPLICANT SURVEY OPEN-ENDED RESPONSES

A NOTE FROM JOHN HARRINGTON

Dear E-rate Stakeholder:

The E-rate program is celebrating its twentieth anniversary – and what an amazing twenty years it has been! The basic mission of the program stands unchanged: connecting students and library patrons to the world around them. But the means of achieving that goal has changed significantly. Back in 1998, connectivity meant dial-up Internet and a wired computer lab. Today, connections take many more forms and are much, much faster. Fiber optic networks link sites together and Wi-Fi signals blanket campuses. We no longer talk about kilobits, or even megabits per second, and the idea of "wiring classrooms" with a data drop is a quaint notion from a bygone era. Today we transfer gigabits of data per second and count the number of wireless devices per student. The world is a very different place than it was twenty years ago.

Yet, the work of connecting schools and libraries is far from over. In fact, in many ways, the work is just beginning. It was more simple in the past when our focus was merely getting schools and library patrons connected to the Internet. Now, we talk about capacity, and the exponential growth in bandwidth requirements. Grades, homework, and tests all are online. Classes are taught remotely and virtual reality field trips are very real. There are users and user devices to authenticate, social media accounts to monitor, and denial of service attacks to mitigate, not to mention hacking, ransomware and other cyber threats. I.T. professionals oversee dynamic networks that are constantly evolving. Having sufficient bandwidth available via a persistent and secure network requires careful planning, sophisticated tools, and expertise. Connectivity is more needed and more challenging to maintain than ever before.

Fueling this connectivity is the bandwidth that the E-rate program helps provide. Over 118,000 school and library facilities benefit from the program. The program itself has evolved over the past few years. In 2014, the FCC took historic step to modernize the regulations governing the program, placing a new emphasis on high-speed connectivity to buildings and on-campus Internet access. Following this change, the program administrator, the Universal Service Administrative Company (USAC), began an ambitious program to modernize its day-to-day operations using a new system called the E-rate Productivity Center (EPC).

The E-rate program serves a vital public interest: keeping our students and library patrons connected in an increasingly digital society. Therefore, we owe it to our communities to be well-informed about the program. The enclosed report provides a snapshot of the E-rate program, circa 2017. It is based on a survey we conducted, and is intended to aid policy makers, administrators and all E-rate stakeholders by emphasizing the strengths of the program while highlighting areas that need improvement.

Thank you for taking the time to read this report. If you have questions about it, please feel free to reach out to any Funds For Learning team member, or to contact me directly via e-mail at jharrington@fundsforlearning.com.

Sincerely,

John D. Harrington

CEO Funds For Learning

Funds For Learning

Funds For Learning, LLC (FFL), is an advocate for the use of educational technologies and student Internet access. Formed in 1997, FFL is a professional services firm that focuses on E-rate funding management and compliance support. Each year, FFL's work directly supports millions of students and library patrons throughout America.

Professional Standard of Conduct

FFL has established and implemented several self-imposed professional consulting standards for our firm and its employees. Although no formal regulation exists governing E-rate consultants, FFL voluntarily complies with the following Code of Conduct, Code of Ethics, and Code of Client Confidentiality.

Code of Conduct

FFL understands that conflicts of interest or the appearance of impropriety can negatively impact customer trust and/or E-rate application success. Therefore, FFL has a comprehensive Code of Conduct to which its staff complies.

Below are several key elements of this code:

- FFL does not sell or offer any E-rate eligible services
- FFL does not have a SPIN (Service Provider Identification Number)
- FFL does not prepare technology plans
- FFL does not advise clients on what technology to procure or from whom to purchase it.
- FFL does not receive payment from service providers based on their sales to applicants.

FFL first developed a formal, internal code of conduct in 2002; and, in 2004, FFL became the first E-rate consultancy to publish a code of conduct and to submit itself to public accountability in this manner.

Code of Ethics

FFL is a founding member of the E-rate Management Professionals Association (E-mpa®). This association has developed a comprehensive Code of Ethics for E-rate consulting firms. This Code of Ethics is based on similar codes established for Certified Public Accountants. As a member of E-mpa®, FFL agrees to comply with the E-mpa® Code of Ethics.

Code of Client

FFL places a high value on client confidentiality. FFL employees frequently receive confidential information from client customers. FFL does not share that information with other parties. Furthermore, as a condition for employment, each FFL staff member agrees to and signs a strict client confidentiality agreement.

ABOUT THE E-RATE DISCOUNT PROGRAM

Universal Service Funding for Schools and Libraries, commonly referred to as the E-rate program, provides discounts to eligible entries in the United States towards the purchase of goods and services necessary to connect students and library patrons to the Internet.

ABOUT THE REPORT

The E-rate program supports nearly every school and library in America, annually providing billions of dollars of much needed support for Internet access, telecommunications, and computer networking. Over 23,000 applicants and 4,900 vendors currently participate in the program. For most, their perception of the program is limited to a handful of funding requests and a few personal interactions with USAC customer service representatives.

The purpose of this analysis is to provide stakeholders with a broader picture of the E-rate program. The data provided is derived from publicly available funding request data as well as a nationwide survey of applicants conducted in June 2017. All information is current as of November 15, 2017.

This report is not intended to be an encyclopedic review of the program. There are many additional statistics and reports that could be presented. Furthermore, while we strive to be fair and even-handed, this is not a scientific analysis conducted by an independent third-party.

It is our hope that this information will serve as a catalyst for discussion, new ideas, and ultimately, further improvements to this vital program.

LOOKING AT THE 2017 REQUEST DATA

E-rate funding request data is publicly available and provides unique insight into the communications needs of schools and libraries. The most basic data includes an applicant's name, their service provider(s), E-rate discount rate, and the category of the goods and services being requested (Internet access, telephone service, internal connections, and so on). This data has been available since year one of the program and provides the most consistent source of data for year-to-year comparisons.

Beginning in 2015, applications have required detailed line item information for each funding request, such as specific line counts, connection speeds, unit quantities, and make and models of equipment. The method of collecting this data varied somewhat between 2015 and 2016, making comparisons difficult or impossible. There is also variation in how applicants prepare their responses. As more data is collected and as applicants receive consistent guidance, it is expected that the detailed funding request information will become more useful for year-to-year trend analysis.

FY2017 E-rate Applicants Across the United States
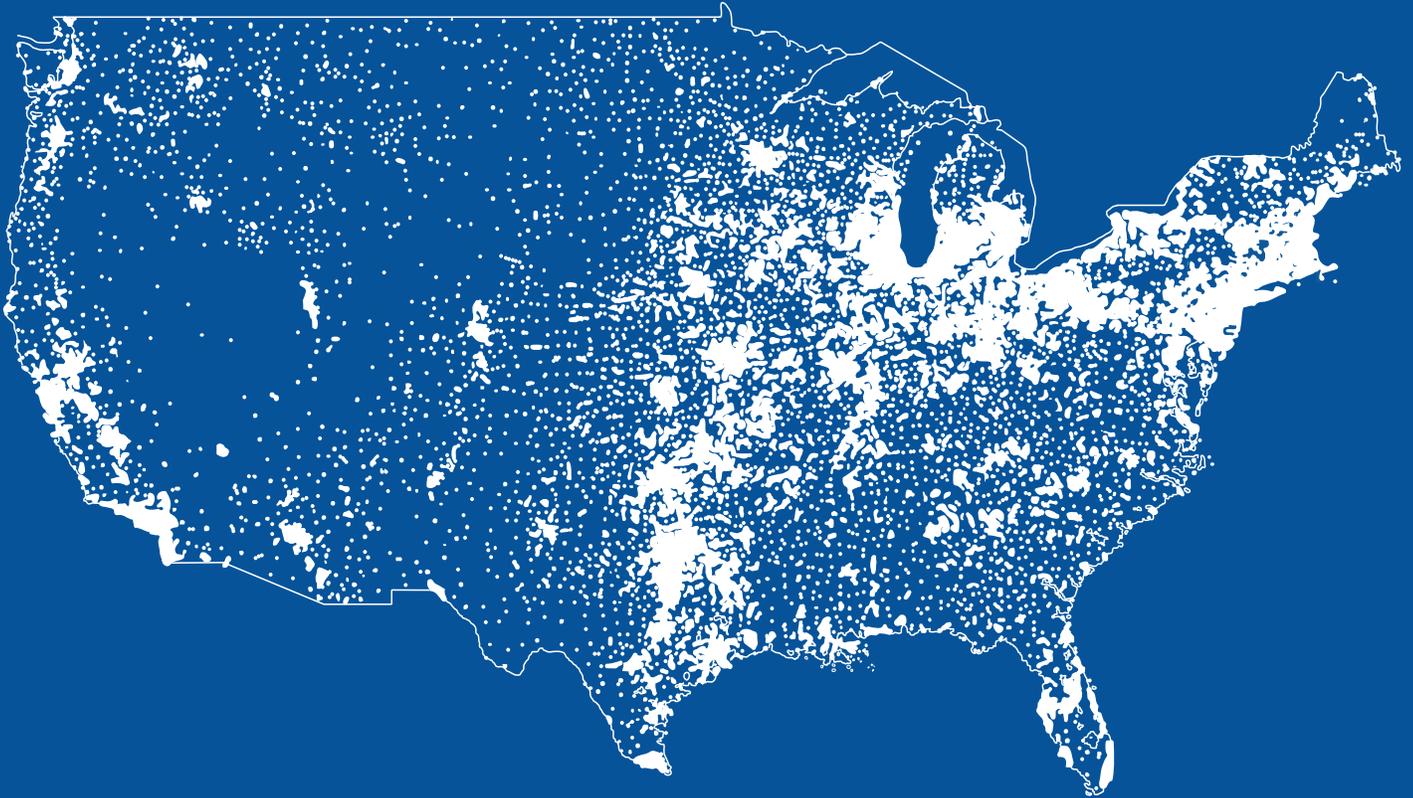
$4.5 Billion in Services Supported by E-rate
TOTAL OF FUNDS REQUESTED AND APPLICANT PAYMENTS (IN MILLIONS)

■ E-rate Portion of Cost   ■ Applicant Portion of Cost   ■ Total

	E-rate Portion of Cost	Applicant Portion of Cost	Total
DATA & INTERNET SERVICE	$1,940	$581	$2,521
VOICE SERVICE	$136	$482	$619
SWITCHES & ROUTERS	$391	$181	$572
ON-CAMPUS WI-FI	$195	$93	$288
ON-CAMPUS CABLING	$112	$64	$176
ON-CAMPUS INSTALL	$99	$34	$134
MANAGED WI-FI	$67	$26	$93
BASIC MAINT & C1 HW	$56	$24	$80

Count of E-rate Applicants
FY2012 TO FY2017 BY TYPE

	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017
Consortia	491	487	501	573	493	489
Library Systems	4,149	4,181	4,193	4,101	3,461	3,036
Single Schools	8,680	8,907	9,282	8,500	6,862	6,699
School Districts	13,193	13,334	13,511	13,987	13,221	12,812

Legend: Consortia, Library Systems, Single Schools, School Districts
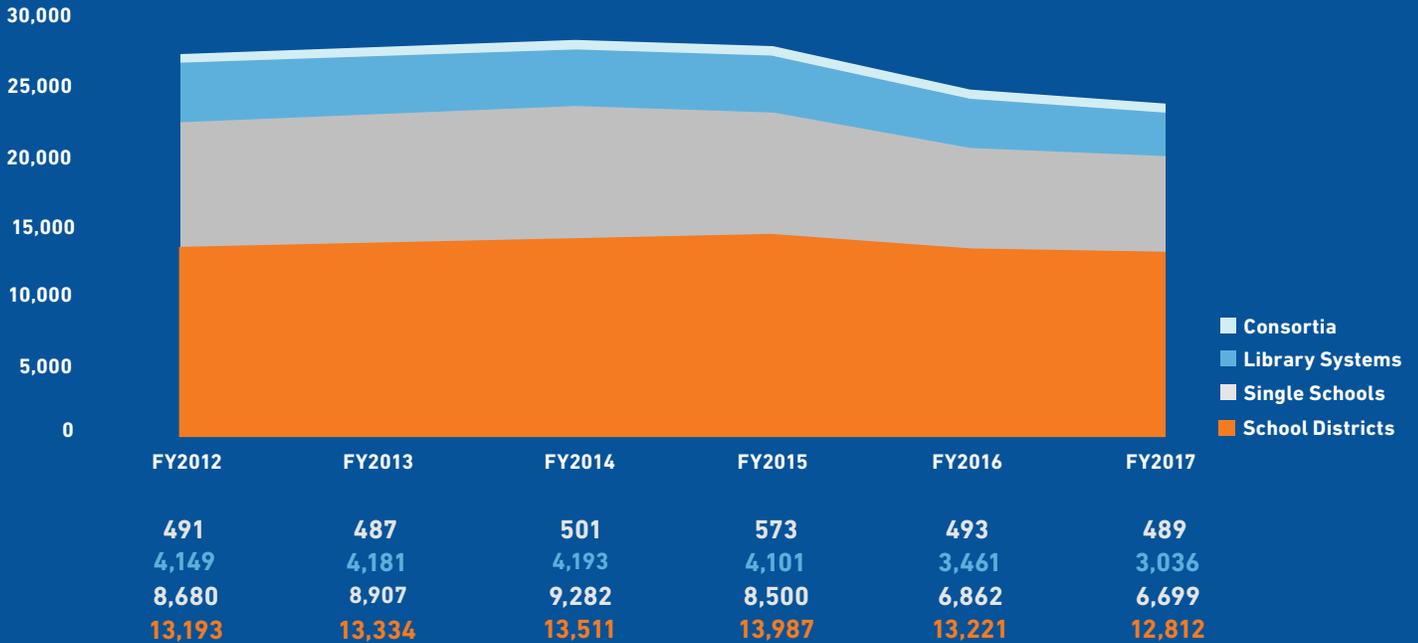
Count of Sites Listed on Applications
FY2012 TO FY2017 BY TYPE

	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017
Library Sites	12,236	12,066	12,063	11,574	12,565	12,027
Non-Instructional Sites	13,123	13,729	14,295	14,701	14,544	14,907
School Sites	113,488	112,984	114,167	113,048	106,647	106,321

Legend: Library Sites, Non-Instructional Sites, School Sites
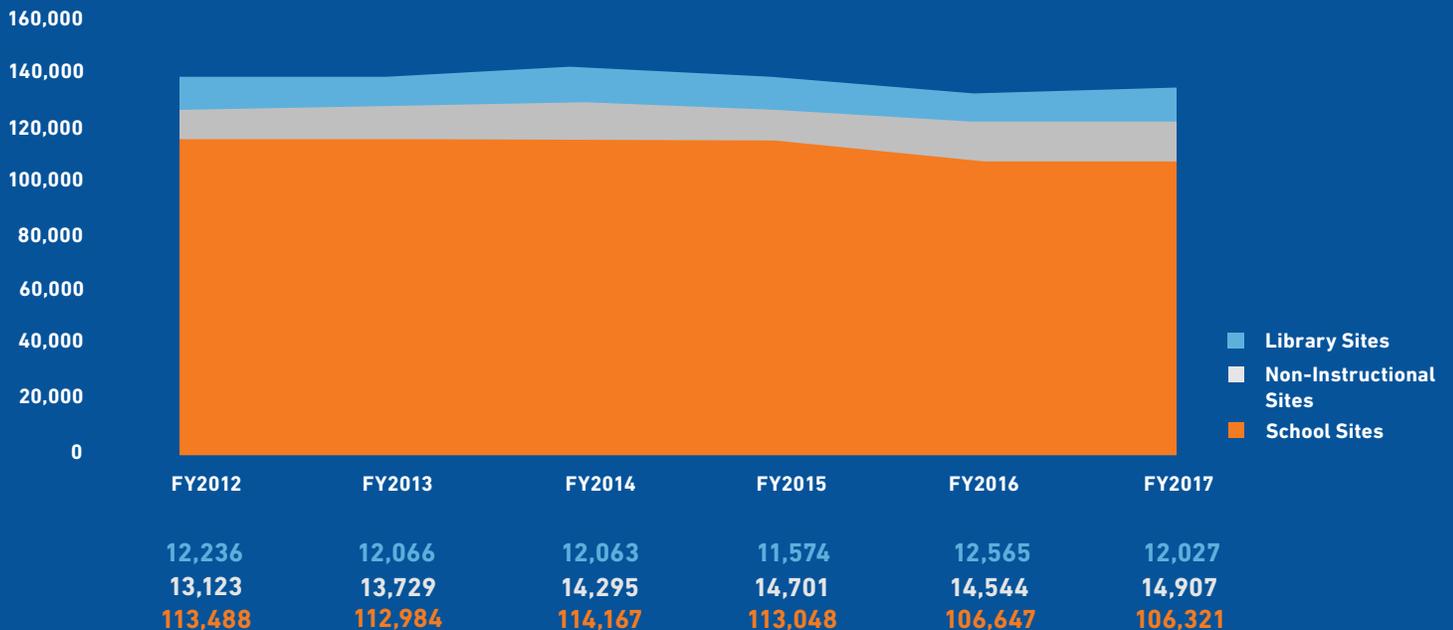
E-rate Discounts Requested in Billions
(FY2011-FY2017)

■ Broadband **■ Voice** **■ On-Campus**

Year	Total
FY2011	$4.7
FY2012	$5.2
FY2013	$5.1
FY2014	$5.0
FY2015	$3.9
FY2016	$3.6
FY2017	$3.0
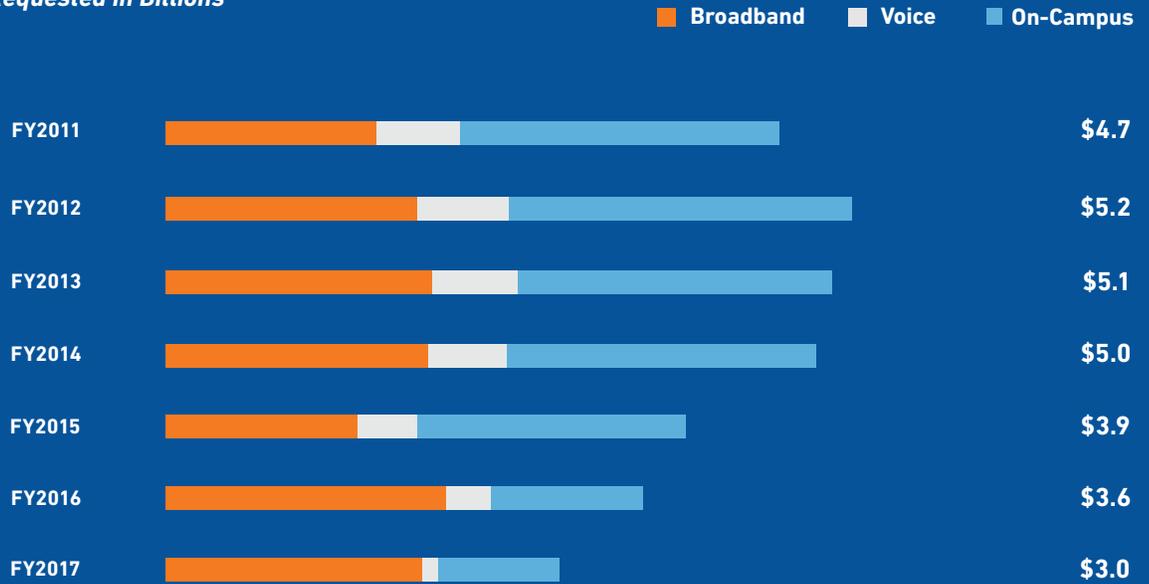
Average Category 2 Spending per Site
(OF SITES SEEKING CATEGORY 2 DISCOUNTS)

■ E-rate Portion of Cost **■ Applicant Portion of Cost** **■ Total**

		E-rate Portion of Cost	Applicant Portion of Cost	Total
SCHOOL SPENDING	2015	$28,615	$9,296	$37,911
	2016	$21,975	$9,057	$31,032
	2017	$23,050	$9,525	$32,576
LIBRARY SPENDING	2015	$9,092	$2,183	$11,275
	2016	$7,458	$1,910	$9,368
	2017	$9,880	$2,261	$12,141
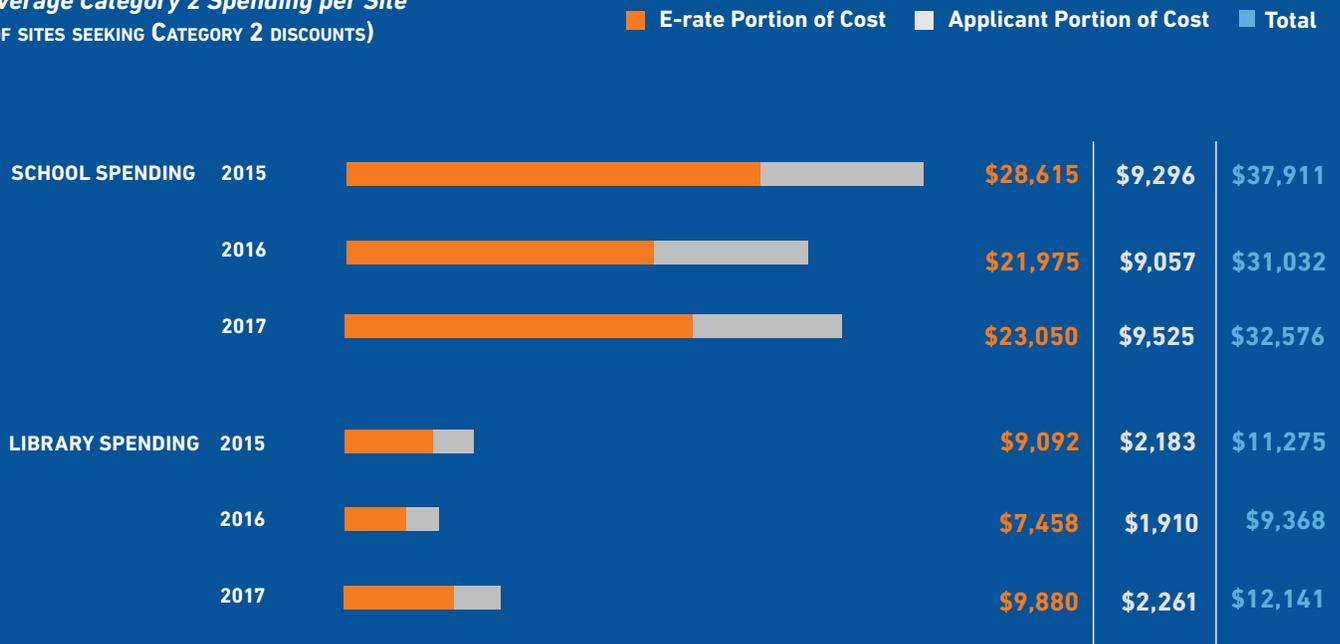
THE 2017 APPLICANT SURVEY

In June of 2017, Funds For Learning conducted its 7th annual E-rate survey, designed to gather feedback and insight from the schools and libraries who participate in the program. The survey is necessary because E-rate funding request data paints an incomplete picture. Not all information is gathered on Form 471 funding applications. For example, applicants may have need of services that currently do not qualify for E-rate discounts. By definition, these services are not included on funding applications.

Additionally, there is no basic mechanism for applicants to provide feedback to the FCC about the administration of the program. Applicants can submit Letters of Appeal to the FCC; however, this only captures a certain subset of feedback, mainly negative feedback, related to specific USAC actions or decisions. There is no forum for applicants to express what is working well.

This year's survey received 1,096 applicant responses. This sample size equates to a margin of error of +/- 3%. Because the respondents represent a cross-section of applicants that closely matches the overall population of E-rate applicants, we believe that this survey provides a very good indication of what applicants think about the E-rate program today.

SURVEY DEMOGRAPHICS

Applicant Type

- **59%** School District
- **20%** Library
- **10%** Individual School
- **6%** Library System
- **5%** Consortium
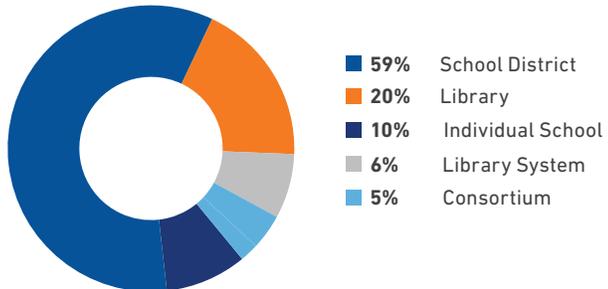
Public or Private Institution

- **96%** Public
- **4%** Private
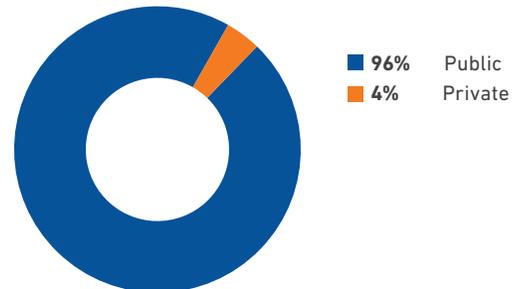
Urban or Rural Institution

- **65%** Rural
- **35%** Urban
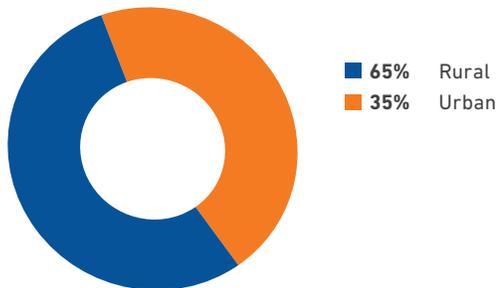
Using Paid E-rate Consultant

- **45%** Yes
- **55%** No
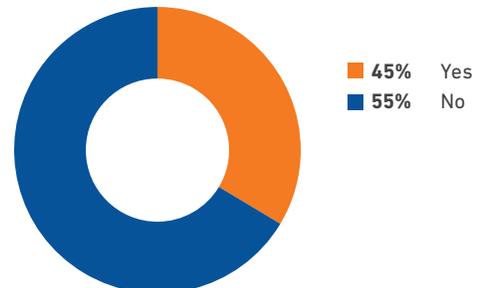
FY17 Funding Request by Type of Preparer

- **35.8%** 8,708 self-file, no consultant individuals
- **31.8%** 357 consulting firms and sole proprieters
- **32.4%** 24 E-mpa® consulting firms

SCHOOL NETWORKS
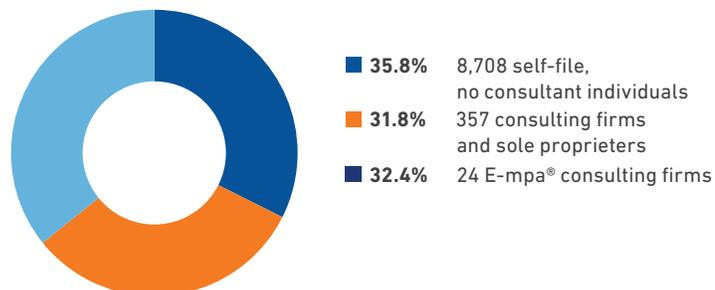
**93%** say that Wi-Fi is critical to fulfilling their organization's mission.

54% of surveyed applicants applied for Category 2 funding in FY2017

**Considering all of your sites, when will you have exhausted the current C2 budget cap?**
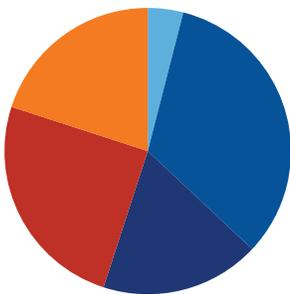
- 🟧 **29%** FY2017
- 🟥 **21%** FY2018
- 🟦 **13%** FY2019
- 🔵 **2%** We exhausted our Category 2 budget cap in FY2015
- 🟦 **15%** We do not expect to exhaust our Category 2 funding caps

How old is your Wi-Fi network?

9% NEW (WITHIN 1 YEAR)

46% 1–3 YEARS

25% 4–5 YEARS

19% OLDER THAN 5 YEARS

2% N/A - WE DO NOT HAVE A WI-FI NETWORK
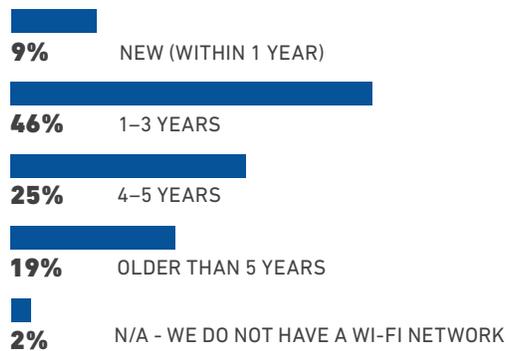
How much do you expect your Internet bandwidth to increase over the next 3 years?

10% NO CHANGE

26% 25% INCREASE

32% 50% INCREASE

7% 75% INCREASE

15% 100% INCREASE

9% MORE THAN 100% INCREASE
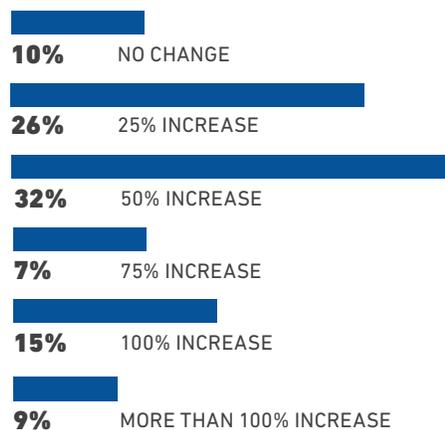
SCHOOL NETWORKS

What budget cap is sufficient to meet your school's needs?

- **18%** Current sufficient
- **35%** $250/student
- **28%** $350/student
- **19%** More than $350/student
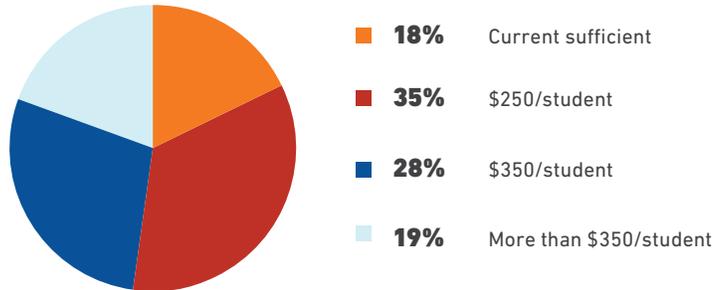
What budget cap is sufficient to meet your library's needs?

- **37%** Current sufficient
- **25%** $3.00/sq' [r] $6.50/sq' [u]
- **26%** $4.00/sq' [r] $7.00/sq' [u]
- **12%** More than $4.00/sq' [r] More than $7.00/sq' [u]
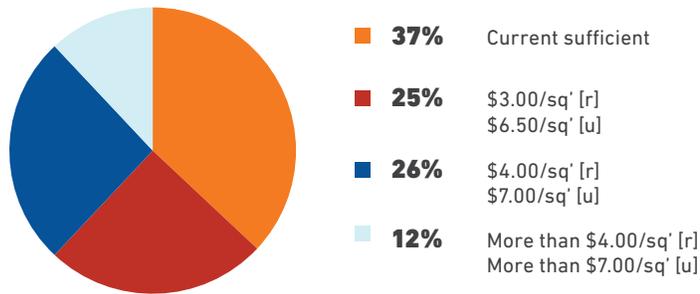
How many devices per user on your network?

- **23%** MORE THAN 1 DEVICE PER USER
- **25%** 1 DEVICE PER USER
- **44%** 1 DEVICE PER 2-49 USERS
- **8%** LESS THAN 1 DEVICE/50 USERS
- **1%** N/A. NO WI-FI.
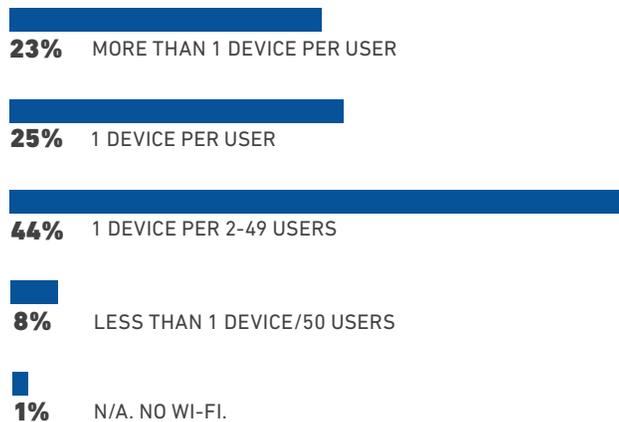
What changes would you make to the Eligible Services List?

55% VOICE SERVICES

14% FILTERING/SECURITY

10% END-USER DEVICES

8% CELLULAR HOTSPOTS

4% WEB HOSTING

4% FAILOVERS INTERNET

3% SERVERS

3% NO CHANGE
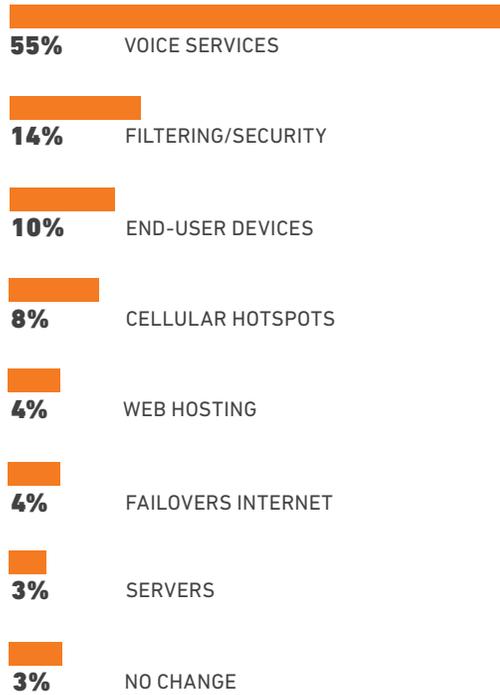
For those that did not request Category 2 discounts, why not?
Applicants checked all that applied.

86% WE DO NOT INTEND TO APPLY FOR CATEGORY 2 DISCOUNTS

84% WE EXHAUSTED OUR CATEGORY 2 DISCOUNTS IN FY2015 OR FY2016

81% UNABLE TO COMPLETE CONTRACT AWARD BEFORE FORM 471 DEADLINE

80% CATEGORY 2 FUNDING REQUESTS ARE TOO DIFFICULT

**78%** NOT ENOUGH MONEY LEFT IN OUR CATEGORY 2 BUDGETS TO JUSTIFY WORK
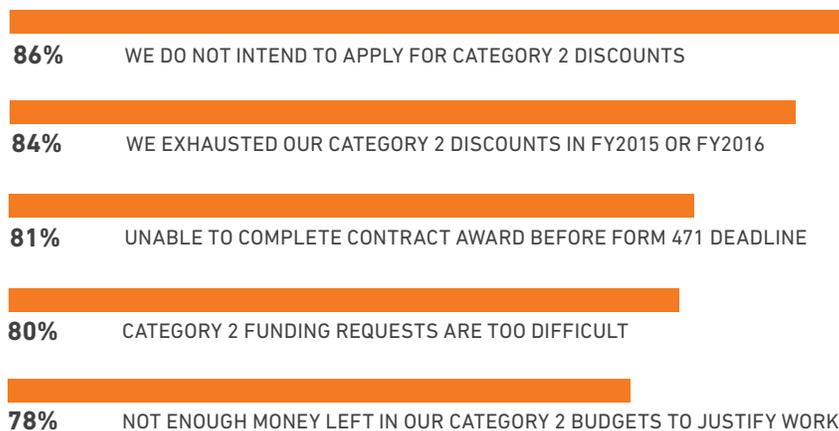
SCHOOL NETWORKS

Should C2 budgets be administered at the district/library level?

- **88%** Yes
- **12%** No
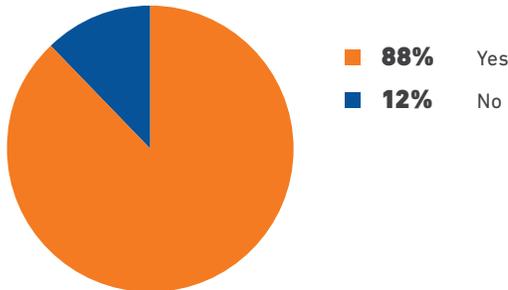
Do you have a back-up or a secondary Internet connection?

- **19%** Yes
- **81%** No
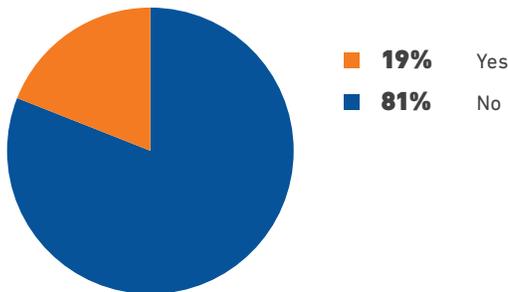
Should back-up or a secondary Internet connections be eligible?

- **23%** No
- **77%** Yes
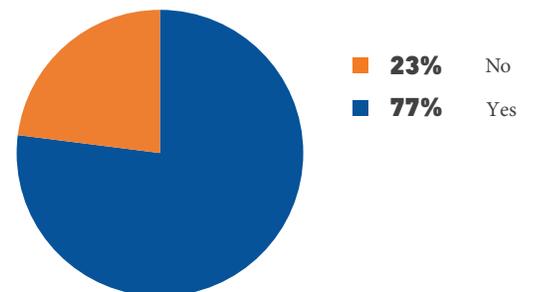
HOMEWORK GAP

Insufficient off-campus Internet access for students or library patrons is a significant issue in our community.

- STRONGLY AGREE — **41%**
- AGREE — **32%**
- NEITHER AGREE/DISAGREE — **15%**
- DISAGREE — **6%**
- STRONGLY DISAGREE — **2%**
- I DO NOT KNOW — **4%**

SELF-PROVISIONED NETWORKS
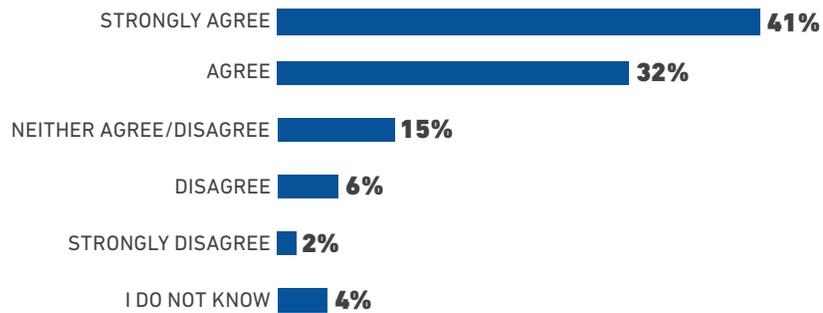
Did your organization submit a Form 470 that included an option for a "self-provisioned" network?

■ **Yes** 11%   ■ **No** 89%

Self-Provisioned Option Lowered Price per Megabit

- **4%** STRONGLY DISAGREE
- **5%** DISAGREE
- **21%** NEITHER
- **30%** AGREE
- **18%** STRONGLY AGREE
- **23%** I DO NOT KNOW
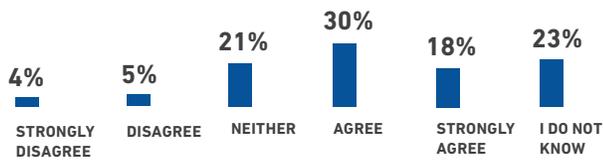
Considering Self-Provisioned Networks in the Future

- **49%** NOT LIKELY
- **17%** SOMEWHAT LIKELY
- **7%** VERY LIKELY
- **27%** I DO NOT KNOW
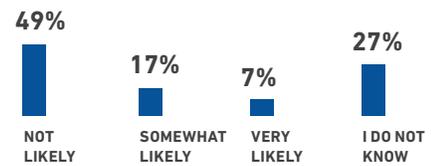
Result of Seeking Self-Provisioned Network

- ■ **16%** Signed contract for a *self-provisioned network* for our entire network.
- ■ **23%** Signed contract for a *self-provisioned segment* and other segments are leased or owned.
- ■ **20%** Other
- ■ **25%** Signed contract for *leased* fiber-optic, and *prices were likely lower due* to the option of self-provisioned network
- ■ **15%** Signed contract for *leased* fiber-optic, yet *prices were likely unchanged* even with self-provisioned network

Reasons Not Currently Seeking Self-Provisioned Network

- ■ **41%** We have an existing multiyear contract with a vendor
- ■ **36%** We are not interested in owning our own network
- ■ **17%** Application process doesn't meet timeline and/or too cumbersome
- ■ **4%** Already own our own network
- ■ **2%** Did not know that was an option
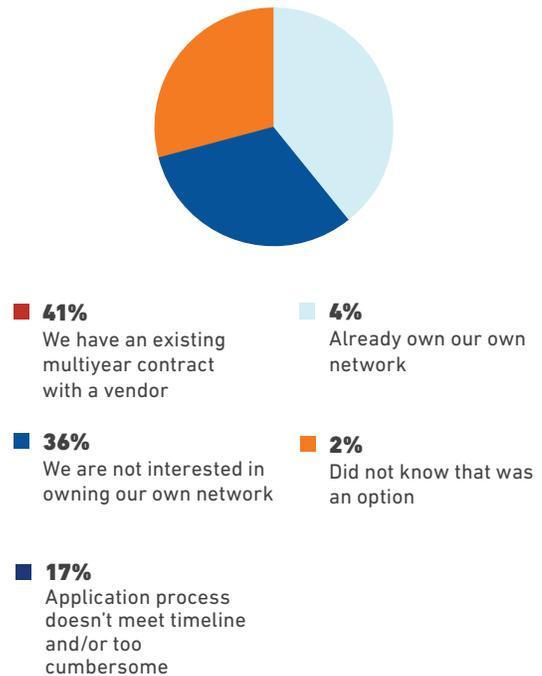
Percentage of Applicants Who Rate USAC Resources as Moderately Helpful or Very Helpful

86%   USAC NEWS BRIEF (WEEKLY E-MAIL)

84%   USAC WEBSITE

80%   USAC CUSTOMER SERVICE HOTLINE

78%   IN-PERSON USAC TRAINING EVENTS

81%   USAC VIDEO TUTORIALS / WEBINARS

58%   HELP FROM USAC'S FIBER OPTICS NETWORK SPECIALIST

56%   REGULAR USAC CONFERENCE CALLS WITH STAKEHOLDERS
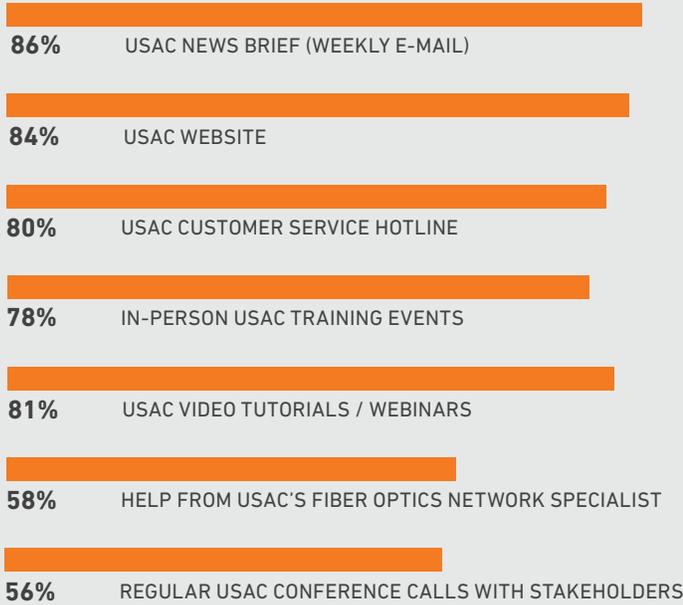
When would you prefer the filing window close?

8%   January

15%   February

31%   March

24%   April

21%   May
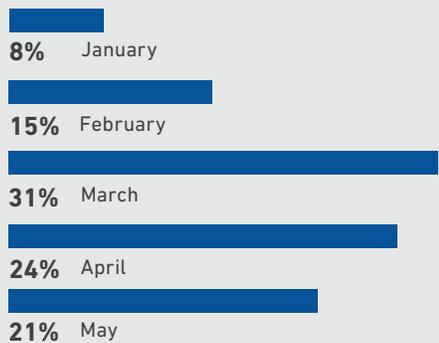
What is a reasonable deadline for USAC to respond to post-commitment requests, such as service substitutions?

- **43%** 2 weeks
- **39%** 4 weeks
- **9%**   8 weeks
- **3%**   >180 days
- **6%**   4 weeks
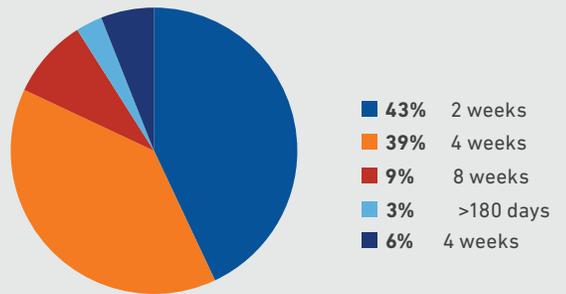
*Is the E-rate Program accomplishing the three goals set by the FCC?*

Affordable Access to Broadband
Ensuring affordable access to high speed broadband sufficient digital learning in schools and robust connectivity for all libraries.

STRONGLY AGREE	28%
AGREE	53%
NEITHER AGREE/DISAGREE	12%
DISAGREE	5%
STRONGLY DISAGREE	2%
I DO NOT KNOW	4%
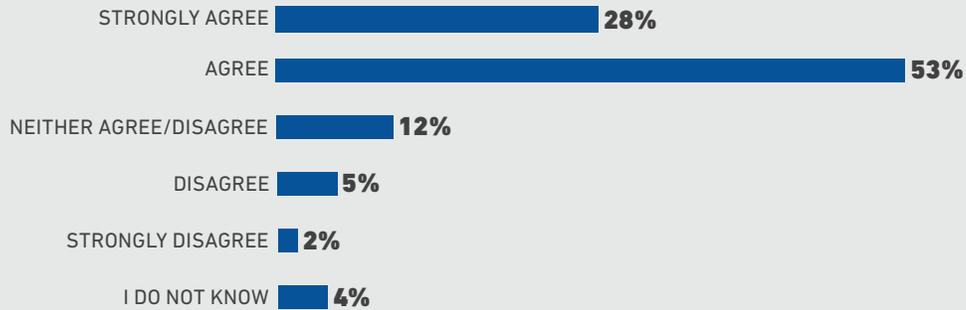
Cost-Effectiveness
Maximizing the cost-effectivness of spending for E-rate supported purchases.

STRONGLY AGREE	16%
AGREE	47%
NEITHER AGREE/DISAGREE	22%
DISAGREE	7%
STRONGLY DISAGREE	3%
I DO NOT KNOW	4%
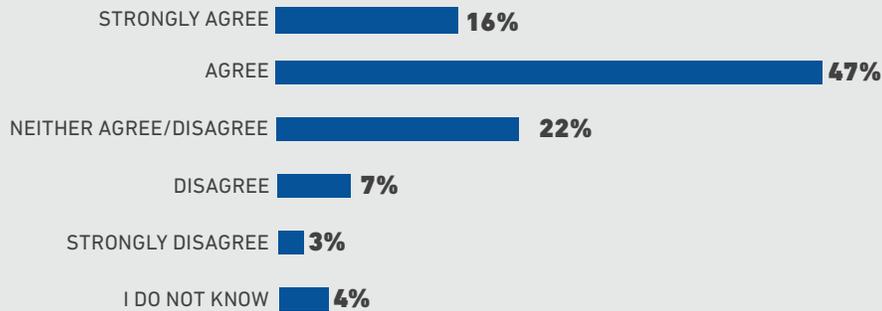
Fast, Simple, Efficient
Making the E-rate application process and other E-rate processes fast, simple, and efficient.

STRONGLY AGREE	8%
AGREE	27%
NEITHER AGREE/DISAGREE	20%
DISAGREE	24%
STRONGLY DISAGREE	20%
I DO NOT KNOW	2%
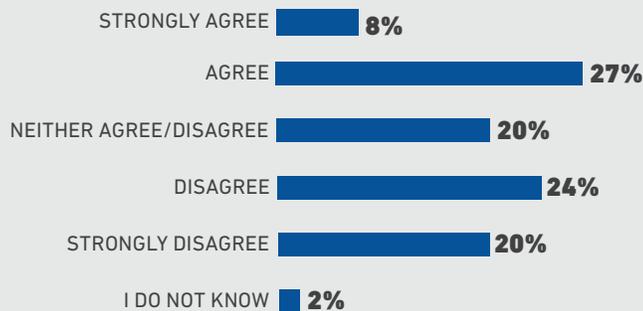
E-RATE PRODUCTIVITY CENTER

What areas of EPC did you struggle with this year?

22%   NAVIGATING THROUGH EPC

13%   MANAGE ORGANIZATION (UPDATING ENROLLMENT/NSLP DATA)

11%   CREATING FRN LINE ITEMS

9%   GETTING KICKED OUT OF EPC/ RETURNING TO 471

9%   CONNECTIVITY QUESTIONS

8%   GETTING TIMED OUT OF EPC

7%   SETTING UP YOUR ACCOUNT ADMINISTRATOR AND/OR USERS

7%   CONTRACT MODULE

7%   CREATING FRNs

6%   YES/NO FRN PURPOSE QUESTIONS
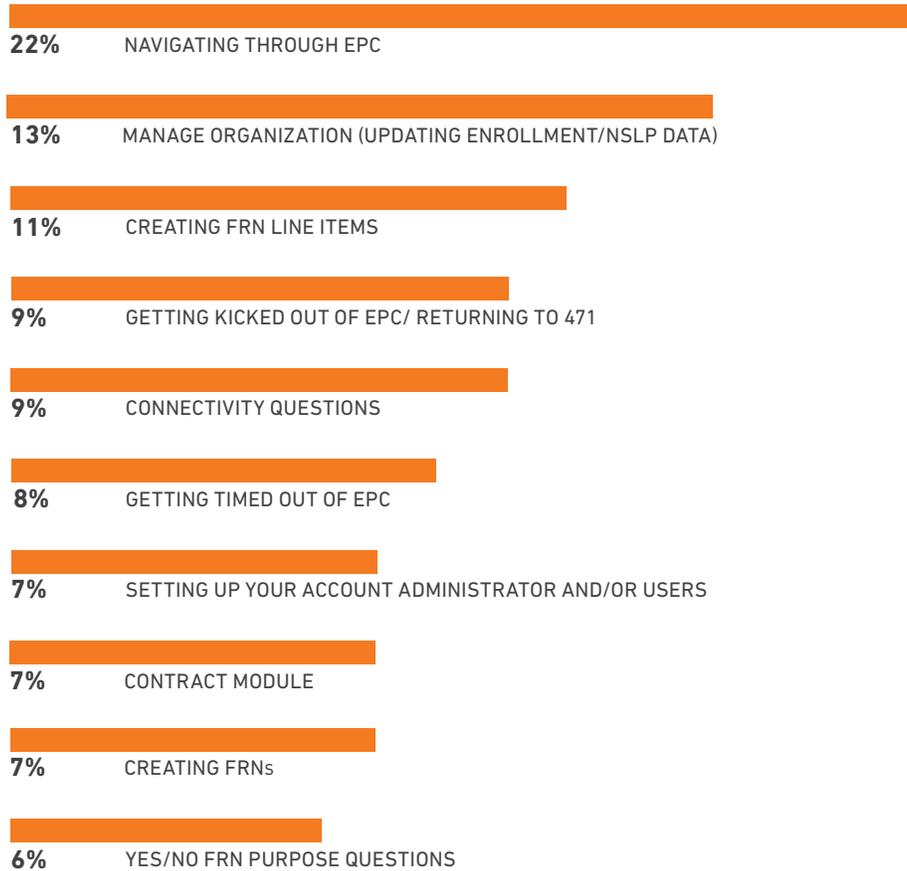
SURVEY STATEMENTS

91%   *My organization will continue to apply for funding in the future.*

84%   *E-rate is vital to our organization's Internet connectivity goals.*

78%   *We have faster Internet because of the E-rate program.*

74%   *We connect more students/patrons to the Internet because of E-rate.*

62%   *Our organization can depend on E-rate to help us.*

48%   *E-rate competitive bidding lowers prices for services.*

42%   *FY2016 application(s) took longer than in previous years.*

28%   *E-rate has been simplified and streamlined the last two years.*

APPLICANT SURVEY OPEN-ENDED RESPONSES

This survey offered applicants a chance to anonymously share their thoughts in an open-ended format. This gave each applicant the opportunity to have their individual voice heard. Unlike multiple choice questions that limit the range of potential responses, open-ended questions allow an applicant to freely share their ideas and opinions. And, because the responses are confidential, applicants could speak their mind freely.

Included in this report are all of the responses provided by applicants. In a few cases, responses have been edited to remove information that might be used to identify a particular respondent; otherwise, the information shared is precisely as it was given via the survey.

By reading all of the survey responses, one can easily see the broad range of experiences and perspectives present within the E-rate applicant community.

> *What is the number one area of program rules/compliance that you would like to see clarified by USAC/FCC?*

1. Clarification of language/terms used
2. Multiyear contracts
3. Reasoning about how they make decisions on funding applications and/or reimbursement reviews
4. The EPC portal is extremely difficult to use. I don't understand why you don't allow our E-rate consultant great access to our portal and allow them to manage the portal for us?
5. What exactly is covered under Category 2 funding?
6. Funding for technology, internet, wiring and hardware
7. The technical terminology is confusing for me. I don't have a helpful IT person to help me file so when it gets into the nuts and bolts of connections and pieces needed it gets confusing. My consultants help with this.
8. Easier and more concise web access and regulations
9. Bidding process
10. MIBS should be returned to Category 1.
11. Eligible services need to be more detailed.
12. Invoicing audits for reimbursement
13. Filing procedures
14. More specific lists of what categories/ items should go under more detailed; user friendly instructions all around
15. We use a vendor.
16. Too many to list
17. Stability in what is going to be covered: We went to VoIP phone service and now are told it is being phased out. The extra cost for us will be prohibitive and now we are stuck.
18. Self provision is important, but the rules make it useless, and funding takes forever.
19. Bidding process; required docs
20. Off campus devices; filtering requirements
21. Simplification of the EPC system! It is cumbersome and very hard to use.
22. Independent School Entity (e.g., Charter Schools)
23. Eliminate the voice phase-down.
24. There are several.
25. Detailed descriptions of qualifying equipment
26. Multi campus filings; one spin for a service provider
27. School district owned fiber installation
28. Duplicative services (internet)
29. All
30. Categories
31. Phone/landline/VoIP services
32. Ambiguous/contradictory/insufficient information
33. Voice service
34. Eligible expenses
35. I would like to see clarification around the Category 1 and 2 funding.
36. After-hour use of data connections for students or home Wi-Fi for after hours and weekends
37. Removal of "gotcha" rules
38. Managed services
39. Mobile data and voice services restored
40. Reduce the document retention period from 10 to 5 years.
41. Ability to use different levels of services and equipment more often
42. The whole process and rules are too complicated for a non-specialist.
43. EPC
44. I kept receiving bids after the 28 days. I'd like to see the deadline date be more pronounced to all companies. Companies are paying attention to dates.
45. Deadlines
46. Main library
47. What should participants do when they receive only one bid?
48. Questions; direct connection on the application
49. When it comes to the BEAR invoices, why does the preparer have to have a pin number when that wasn't a requirement before?
50. CIPA programming
51. Priority 2 projects or equipment
52. Application process and the forms
53. Continue to allow discounts for voice services. Do not phase them out.
54. Bidding process
55. Fiber; community usage; new schools/ annexes
56. How to file
57. Fiber
58. Fiber
59. Caching
60. VoIP; priority 2 hardware and cloud services
61. The rules around fiber are still confusing.
62. Fiber special construction provisions
63. Basic maintenance
64. Network management
65. Appeal processes
66. Bring back voice / telephone coverage.
67. Wi-Fi restrictions
68. Once something is approved, do NOT come back and decline it!! This is unfair to schools and not budgeted for!!
69. Voice services
70. In general, if things were clear, we would not use consultants
71. Fiber; product substitutions; extensions
72. Technology neutrality
73. I think the total allotment of money should be split up on a per student basis like we do everything else and do away with all the application process.
74. Category 2 eligibility (too many provisos)
75. 2-in-5 rule
76. Timeline for reimbursement: we have still seen NO reimbursement money!
77. Eligible items list needs to published much earlier.
78. Category 2 funding: why did we lose funding for phone service? Rural areas do not have services for much data. In our area we do not get fiber to three schools. Why can't state or schools get funding for this? 475,000 for these schools to get service with fiber
79. Voice service
80. Extension deadlines
81. Internet speed

82. Discount levels
83. Dark/lit fiber bidding and funding procedures
84. Changing/modifying existing ISP contracts
85. Telco
86. Application process
87. Bidding / RFP
88. Direct certification
89. Documentation length: some of the documentation required in the E-rate program has to be kept longer for E-rate than the program it comes from (i.e. lunch information). The lunch program keeps documentation for 5 years while E-rate is 10 years.
90. Voice
91. The 'entire' process of the PQA.
92. The website is incredibly difficult to navigate.
93. How can you exhaust matching funds in the final year while changing services? Previously we'd apply for some overlap.
94. EPC portal
95. The review process takes too long.
96. Voice
97. How can we know how much funding is available for each school after some funds are spent?

110. Special fiber construction eligibility: specifically if installing fiber, only needing a single pair of fiber strands, but standard installation protocol is for 6 to 12 strands for future-proofing /expansion and significant long-term savings; Why isn't the full price eligible?
111. Include the 486 in online filing
112. A more concrete list of ineligible products and services
113. Portions of services that are not E-rate eligible
114. All schools need financial support for connectivity, even the ones with low NSLP. A higher percentage reimbursement would be nice for them.
115. Library Systems designation as NIF, therefore not eligible: our internet services are used in training member libraries.
116. Timelines/deadlines windows
117. Category 1
118. Support
119. Individual school site budget tracking
120. Why is the lifespan on equipment purchased with E-rate required to last 5 years, when the normal lifespan of network equipment is 2-3 years?
121. How to file for a library cooperative

140. CIPA
141. Self provisioned fiber
142. Moving to leased fiber should not be considered duplicated service.
143. Get rid of CIPA compliance.
144. Make all E-rate forms easier to fill out annually.
145. Bidding process
146. All processes/forms through the portal: we missed a deadline because the form we needed to complete was on a completely different website.
147. Ability to extend connections outside of 4-walls
148. Less complicated form
149. Bandwidth designations: what a waste of time
150. It is much clearer than it used to be. The cost allocation for a partially eligible piece of equipment could be easier.
151. Procurement /vendor selection
152. Filtering requirement!
153. Fiber related purchases/leases
154. How much can be spent at each school building over a time?
155. Why certain items are not covered
156. Category 2 funding over five years
157. Streamline the process. Why not just take the allocated funds and divide it by the number of students and give each district the amount entitled to by that process? Use the Category 2 formula for Cat egory 1.
158. Phone service
159. USAC needs to revisit its internal procedures regarding consistent review of applications to avoid duplicate requests for information in invoicing that result in confusion and inaccurate record keeping.
160. Work out issues before implementation (i.e. EPC).
161. Gift rule
162. Fiber construction
163. More timely to coincide with approval and therefore to have the ability to install over the summer before the new school year begins
164. Dark fiber
165. Bidding compliance and approval
166. Connectivity
167. Too much paperwork
168. The school budget per student is too low!
169. Include directives and explanations within applications to avoid having to do to a separate page.
170. Category 2 items
171. Evaluating vendor proposals
172. Ten year record keeping is excessive.
173. USAC
174. Contract term: often depends on when the service is installed rather than when the contract was signed
175. Allowed communication with service

More timely to coincide with approval and therefore ability to install over the summer…

98. CIPA requirements
99. Biding process completion and rating: I was confused on what is expected in the process and had many questions.
100. Ability to update entity information
101. Self-provisioned fiber
102. Calculating the discount rate with NSLP
103. Submitting for reimbursement and going through a 2 step process: two different links and username/ passwords
104. We need better and more communication with the applicants. Possibly a group discussion prior to implementing changes to the system
105. Categories of service: What's a 1? What's a 2? It is so confusing.
106. CIPA rules need to be simpler.
107. Doc retention
108. The 28 day wait period after filing the form 470.
109. Please provide more specific listings of what equipment is eligible since much of it is left vague and service providers sometimes are less than truthful about what is eligible.

122. Make it where we can understand what they want.
123. Provide digital locker for ten year document retention on USAC system
124. CIPA
125. Eligible services list
126. Dark fiber applications need a way to be pre-checked by USAC for compliance to all rules before applying.
127. What qualifies for the E-rate discounts?
128. Fiber construction: we were denied funding even after following the guidelines to a T.
129. Bidding rules
130. Cardinal change
131. Form language is confusing; too many "check this, not that" type of situation
132. Special construction
133. Readability
134. PIA reviews and communication
135. The timeline
136. Longer filing window
137. POTS
138. Better explanation of eligible services; less tech jargon
139. Whole process

providers during the bidding process: the reasoning for not allowing cancellation fees to be considered when selecting service providers
176. How to get Category 2 funding
177. How bids must be handled and whether they are needed for all parts annually
178. What exact documentation does E-rate want when submitting Form 471?
179. Less paper work
180. There has to be a way to make this process easier!
181. Schools using a cooperative agreement should be able to be listed so I don't have to do a PIA on my attendance data every year.
182. How long to keep files
183. Provider bid uniformity
184. Voice services
185. Eligible services
186. All rules. There seems to be a lot of federal bureaucracy and very little input from users who would like to see needed changes.
187. I think the changes are confusing and would prefer to be able to finish the application and move on to the next part without having to wait to be notified that it has opened.
188. Late forms should not be denied.
189. Invoicing
190. Make it easier! Why do we need to fill out so many forms?
191. Internal connections
192. All USAC/FCC communication with authorized E-rate Consultant should also be sent to the applicant.
193. Preschool: add to coverage.
194. How to generate all of this paperwork
195. Funding formulas for internal switches and wireless
196. Determine what corrections are allowed and why
197. Changes and updates need to be released sooner.
198. Qualifying for the percentage of funding
199. Bidding
200. Eligible services
201. Internet safety
202. Eligible services - Category 2: simplification of upgrading the district backbone or point to point connections
203. Bidding
204. Type of internet connections/internal connections are extremely confusing and the explanatory notes are not much help.
205. Lowest bid is not necessarily best vendor
206. Existing products and services that will be disqualified in the future
207. All of it: it is such a jumbled mess of bureaucratic nonsense that my organization has to pay a company to do it all for us. That industry shouldn't

even exist.
208. How to get "assistance" from vendors without losing compliance
209. How to use a contract for services; When it is necessary to have one or not?
210. Cabling: what is allowed/covered by USAC?
211. Broadband internet speed
212. Category 2 use of wireless devices and number of years to keep inventory: why 10 years?
213. Provide the funds and get out of the way. Feel free to audit.

How to get "assistance" from vendors without losing compliance.

214. Records retention
215. What each form means and what role it plays in the process
216. State consortium viability
217. Bidder rules
218. Fiber
219. Number of years we have to keep records
220. Self-provision fiber
221. Contracts
222. Deadlines
223. Locating SPIN numbers
224. In general, navigating the site is not easy. Directions should be simplified. I never know if I'm doing things correctly.
225. Category 2 internal connections and basic maintenance
226. Timelines for deadlines seem to change often.
227. Bidding
228. The window for making changes to the profile is somewhat confusing. I was locked out from making profile changes before my 471 was filed.
229. The ability for USAC to make phone calls to the library/school in the PIA process so that clarifying questions could be asked by the library/school to save everyone time and headaches from miscommunication issues based on misunderstanding what the PIA questions are truly asking for
230. Discount formula
231. Category 2 funding
232. Filters
233. Competitive bidding process
234. SIMPLIFICATION
235. CIPA
236. Fiber Category 1
237. Eligible services and clear definitions of those services
238. Special construction on fiber networks

239. Documentation retention
240. Deadlines
241. WEB filtering; firewall
242. The entire process is mind boggling. I would like to have a check list of things I need to do and when they are due.
243. Filtering requirements
244. Priority at funding
245. Record retention
246. $150/student/campus
247. Move the 471 window back to where it was several years ago, closing in the late March or early April time frame.

248. Please use plain language rather than technical.
249. Both Category 1 services and Category 2 hardware - program rules concerning eligibility are too complex.
250. Fiber
251. CIPA compliance
252. Redundancy - adding a second ISP is not allowed
253. Appeal process
254. What determines cardinal changes for a reset of the 28 day period? It seems like USAC can pick and choose on a case by case basis who it deems has a cardinal change on the apps.
255. Dark fiber
256. Category 1 and Category 2 issues
257. Cost effectiveness
258. Clarify the steps to be taken each year and the timeline for each.
259. The EPC is not easy to use.
260. Using district population totals vs per school student totals for discount totals: does not help when one school only has 250 students
261. BEAR reimbursement
262. Applicant's responsibility to consider as valid 470 response when a vendor sends non-specific marketing about products/services that may or may not be relevant to a posted 470.
263. Licenses and firewalls
264. The appeals process is very convoluted especially regarding the FCC involvement.
265. 28 day clock resets during bidding process
266. Invoices and how vendors should supply with E-rate built in
267. How all the pieces fit together
268. FORM 500
269. What happens if you should go to

another provider instead of the provider that the consortium uses. We are often approached by other companies. Sometimes my board does not understand this.

270. What is covered
271. Priority 2
272. The rule/compliance are not the problem. It is just very difficult applying for funds for multiple public libraries.
273. Fiber special construction
274. Bidding process: if the products or services are available through well known sources at a lower cost then those should be available for purchase, following all other guidelines.
275. I would like to see the program rules be set and not changed throughout the year.
276. Internal connections
277. Dark fiber
278. Category 2
279. Simplify the process
280. Concise list of forms and timelines
281. Video conferencing solutions eligibility
282. Fiber funding should be thoroughly explained and not changed during the filing window. All instructions should be posted by the time the ESL is approved by the FCC.
283. The audit questions are not very clear as to what they are asking for.
284. Priority 2 funding
285. What to do when USAC isn't able to get information to local ESD: I did not get to apply this year because we were waiting on numbers from USAC that never came.
286. How to use the USAC website
287. EPC
288. Eligibility list needs to be more clear.
289. Fiber rules which have changed during the funding year!
290. Fiber WAN service (dark, lite, gray, managed)
291. Approved services
292. Title
293. Poorly created electronic forms; landing page is a mess.
294. How to apply for multiyear subscriptions/licenses for internal connections
295. Service agreements with extensions
296. VoIP when you use phone and internet as one service from the service provider, but have to cut it up for E-rate
297. Fiber deployment
298. Eligible services: too complicated
299. Fiber build
300. Wasteful PIA review: USAC is a barrier to USF funding.
301. Budget cost per pupil
302. Funding for self-owned fiber
303. All
304. Category 2

305. Application deadlines and strict interpretation
306. In-depth training for the entire program would be helpful. The reason our district contracts with a consultant is because the two employees who handle E-rate for the district have never received formal training.
307. PIA review has become more cumbersome on the new system.
308. Guidelines for more detail on rules of 470 & 471 request
309. More down to earth instruction
310. Streamline the process.
311. The date range is very confusing. Changing it to fiscal year or calendar year would be great.
312. District owned devices (iPads, Chromebooks, etc.) that are used off district need to be filtered
313. Redundancy for equipment and connections
314. Complexity and ever changing nature of what is eligible; the ever changing application process; website not intuitive
315. Different types of fiber defined better
316. Telecommunications
317. Providing internet access for students at home
318. More info on what is E-rate eligible as far as internal connections
319. Telephone service
320. Streamline the applications process

> *I would like an outline of dates and forms with links so that we don't miss deadlines.*

321. I find it hard to know what has been certified. The EPC can be very confusing.
322. Distance learning
323. I would like an outline of dates and forms with connecting links so that we don't miss any deadlines.
324. Why cut the fund for telecommunications service?
325. Funding of special construction
326. CIPA; dark fiber
327. Fiber rules
328. Supplemental internet connections: redundancy is not allowed, but with the increased reliance on internet connectivity, we desperately need both redundancy and the additional speed.
329. Category 1 services
330. Make it easier to understand the dash board.
331. Just make the portal easier to use. It is

AWFUL!
332. Timeline to receive BEAR funds once form is submitted
333. Resilient internet connectivity
334. Internal connections; to see cell service covered again
335. Make it all simpler!!!
336. Why can't we store all of our filing related documents in EPC. This would streamline the PIA reviews if everything needed were already at their fingertips.
337. Fiber maintenance with applicant owned WAN networks
338. I would like vendors to understand the rules and not put it at risk by doing things they shouldn't do!
339. Consortium / local district and building relationships
340. Documentation needs
341. Internet firewalls
342. Fiber applications
343. Only using approved bidders
344. USAC adopting a customer service orientation rather than enforcement
345. Losing voice coverage means we lose E-rate coverage. The ILA discourages internet filtering for libraries, and we do not have the staff, money, or time to filter and follow the filtration rules (ability to turn it off, etc.). We depended on E-rate for help with our phone bill, and now that it's no longer recognized, we don't bother with E-rate.
346. MAKE REPORTS EASIER.

347. All of it: it's about as clear as mud!
348. PIA Reviews
349. Website functionality and streamlining of the application process.
350. Category 2 items
351. Which forms to complete and when: then step by step instructions on how
352. Duplicative services
353. Explanation of ineligibility
354. Deadlines
355. Cost allocation
356. Eligible use
357. PIA reviews
358. Fiber and network equipment simplified
359. In this day, redundant broadband should be allowed.
360. Make the procedure steps more clear.
361. I still find tracking the years a problem. I'm filing in this year for next year's funding while requesting last year's refund and being asked to predict 6

months out what I'll be implementing and purchasing. In an IT life cycle a lot of change can take place in that amount of time.

362. Competitive bidding requirements
363. Eligible services/equipment
364. Invoicing
365. Cat 2 allocation by school - should be district allocation, not by school
366. Procurement process
367. Parent/child relationship when entity numbers are changed. I have had great difficulty resolving access to my previous entity number's forms to complete the process despite a multitude of phone calls and emails. They all say it's in the proper place in the process.
368. Inclusion/exclusion of charter schools in our district
369. RAL
370. Eligible services
371. Simplify the process.
372. Special construction: fiber builds
373. PIA/PQA
374. What fines/fees are allowable expenses? USAC told me the service provider are supposed to tell me what these are, but the service providers don't know.
375. CIPA
376. Category 2 equipment and all that goes with it: what is covered specifically?
377. Billing
378. Contracts and competitive bidding
379. Duplicative service funding
380. Bandwidth analysis
381. Outdated equipment during the process
382. Lowest corresponding price
383. Amount that our school qualifies for and how long until we can reapply
384. Fiber connectivity
385. I do not speak USAC. Our state librarian has a wonderful person who translates for us.
386. NIF, CESA eligibility
387. The whole process
388. The whole thing could be simplified. Less acronyms would help.
389. Would like to see fewer rules
390. Despite recent clarifications, I find it confusing to define what is considered a part of a campus and what must be an annex or separate BEN
391. Category 2 funding
392. Category 2 eligible services
393. Eligible services with descriptions that a non-techie can understand
394. Simplification of the forms
395. Document retention: with the change to epic we do not receive PDFs or files. In many cases I take screenshots to continue to collect the same information for retention.
396. On-line filling system

397. The 470 bid deadline: the countdown window for filing needs to be clarified.
398. The documentation required for every single individual piece of equipment received, even if it is just a part of a larger piece of equipment! They wanted maps, detailed item by item locations, it would have been nice to know upfront all we needed to document. We did but there are so many warnings and alerts when you go to certify, it would be nice to have that as one of them.
399. Application process
400. Qualifying Category 2 services
401. Cat 1: circuits/service
402. Have all the rules in ONE place ahead of the game including dates.
403. Self-installed fiber: they told us to put EVERYTHING on one application, then didn't fund the equipment part because we put it on the same application as the data part.
404. Direction of Category 2 budgets after this initial 5-year implementation
405. EPC usage instructions & more defined procedures on answering PIA requests
406. Category 2 discounts
407. USAC invoice review and approval
408. Self-provisioned or dark fiber
409. Rules to apply for fiber are ridiculous. The new WAN definition is a joke.
410. Why is it 10 years for document retention? It seems excessive.
411. Ability to easily discern if a specific product or service is eligible
412. Dark fiber and subscription internet
413. Ensure that audits are conducted using the rules that were in place DURING THE FUNDING YEAR that is being audited/reviewed.
414. The process has become muddled and communication is poor for issues. Response is quick but resolution is not and seems dependent upon the customer to do all the work.
415. Complexity! The forms and process are far too convoluted!
416. Special construction
417. 471
418. Status of applications / SPIN Changes
419. Processes
420. Funding caps
421. Gift rule: can we demo equipment from a vendor for a limited time (60 days)?
422. Better instructions: step by step - how to navigate EPC without watching a video
423. Figuring percentage based on free / reduced lunches (but better than it was)
424. Special construction
425. Bidding rules need to allow for the buyer to determine if an addendum is material enough to warrant an extension of the time to respond.
426. Wished they realized that technical specifications for all internet / WAN

connections are not the area of most educators
427. Discounts
428. Support for spending to entity Category 2 budgets (i.e. projects) should be able to exceed Cat 2 budget, but be reimbursed only up to the budget. For example, if Cat 2 budget is $100; eligible widgets cost $6/unit; 17 widgets ($102) needed for project; allow applicant to apply for 17 widgets instead of 16 ($96) and pay for the extra $2 as part of the applicants share, but still receive support for the other $4.
429. Fiber between campuses
430. Cost allocations for internal connections
431. State master contracts: filing individual applications
432. Using master contracts
433. Seems to me to be very clear if you read the descriptions, pay attention and read the ESL thoroughly
434. Fiber

If you could add one item or service to the E-rate eligible list, what would it be? Why?

1. Increased coverage of telephone services & toll free lines
2. Hotspots
3. PRI: I know they are currently eligible (at 20% discount FY17-18, then not covered). PRIs are still the best option for us to connect to the public network for voice communications and with 200 sites we spend nearly $100,000 per month on PRI. So it is costing us $80,000 per month by not having our prior 80% discount.
4. Voice services: Now that voice has been phased out, we don't have the funds to upgrade our internet connection to something large enough to meet our needs. Unless we can get our voice services funded by E-rate, we may have to turn off our data circuit all together.
5. Network cards for USPs: we are being told we have to pay for them now, even though the funding was approved.
6. Purchase of PCs: district is in dire need of this
7. I'd like to continue to keep the phone and if I added anything it would be a portable hotspot people could check out.
8. Classroom technology
9. Telecommunication (telephone) service: every entity needs telephone service for patron safety.
10. Phone lines at 100%: internet does not work during storms.
11. Internet filtering because everyone has to filter
12. Content filters are a required piece of the network puzzle, but are not covered.
13. Keep voice services
14. Voice services
15. Redundancy in connections; single point of failure
16. Just increase what we get
17. Server software
18. Resilient internet configurations
19. Individual Mi-Fi devices/plans provided by libraries
20. End-user devices because a good network is not enough

21. Add telephone handsets to internal connections
22. Ability to cover network security in LAN places with no students
23. I cannot 'just' think of one...
24. On premise VoIP systems
25. Keep phone service
26. Our branches: we cross LATAs and telcos, so joining us all together is not feasible at this time, but would be very cost-effective, and improve services at our branches.
27. Communications equipment: we are losing out on Cat 2 based on number of students
28. Smartphone service
29. Firewalls priced out separately but provided by the same service provider as internet
30. VoIP phone and emergency notification services, cloud based services
31. Phone/landline/VoIP services
32. Telephone: essential and expensive
33. Hardware
34. Computers: network/connectivity is useless without end-user devices.
35. Content filters because we are mandated to have them
36. VoIP: because it's a vital communication tool that has to be paid for
37. Voice
38. Hardware acquisition
39. I would like to see the voice service to continue to be fully funded.
40. Cell phones / hotspots service for low income students: home access is still a big problem for students in my district. We currently have students with low or no Wi-Fi connection at home, limiting them to take part in digital assignments at home.
41. Voice
42. One-time sign in service to help users
43. Mobile data technology since we have a large homeschool population
44. Security cameras for safety
45. Telephony
46. Telephone systems and service

47. Telco: the expense to our organization
48. Community internet access; phones/VoIP; classroom technology/on-line curriculum and on-line testing equipment: Everything is so integrated now.
49. IT services
50. VoIP
51. Telco: it was very important in our budget
52. We need more of a step by step (for understanding) what we put in Cat 1 and Cat 2. Example: for Cat 1 you put the following [then list what should be in Cat 1], and the same for Cat 2. I know it seems like you are holding our hand to walk us through each Category.
53. Servers and switches that are not specifically used for Wi-Fi
54. Advanced network control software
55. Phone service
56. Mobile hotspots for patrons to access internet at home
57. Hotspots
58. Telecommunications: because it is costing our district about $40,000+ per year & we no longer receive any reimbursements from USAC/E-Rate.
59. Voice: every district has to have it. It's a security and efficiency necessity. Also, E-rate funds come from voice fees.
60. Funding for equipment
61. Continue to cover voice services. The discounts are a big help to our budget.
62. Devices: connectivity can only take us so far without up-to-date devices with which to access online resources.
63. Voice/phone
64. Software license fees
65. Telephone service; broadband service for buses
66. I would put telephone service back on the eligible list.
67. Better reimbursement for local and long distance voice service
68. Telecommunications
69. Voice: bring it back.
70. Landlines because even with internet

access, telephone access is still a necessity.

71. VoIP phone services
72. Reinstate VoIP & cell phone services. We are a boarding school located in very remote area of the Crow Creek Sioux Reservation. Our funds are very limited.
73. Cloud data services: more and more libraries and schools are using cloud based services for library management.
74. Web filter
75. Filtering because it is a government mandated requirement and is bundled with many eligible services. Also, DDoS service as part of internet. Also, next generation firewalls. Oops I submitted three and not one item.
76. Servers
77. VoIP
78. I would like funding for telephone service and telephones to be fully funded again. This is a necessary service for schools and requires a large amount of funds to install, operate, and maintain.
79. Cyber security resources
80. Voice service: this is what a small library needs most.
81. VoIP and telecommunications
82. Phone hardware because it should be included for connectivity purposes
83. File servers
84. Restore telecommunication voice services to full discount levels.

Restore telecommunication voice services to full discount levels.

85. Devices provided to patrons: more cost effective to provide connectivity to patrons
86. Internet CIPA filter
87. Hardware/computers/iPads: they are expensive and would ease our budgets for buying items like this for our schools.
88. Bring back voice! We have to have phones in classrooms for safe schools and now we have to pay for them. Really miss that Category 1 service!
89. Filtering: schools are still required to use them.
90. Voice coverage: cell phone necessary for school nurse and psychs
91. Assistance in completing the various forms
92. Bring back POTS
93. Hosting for data backup and online services: with the growth of the internet and reliance on data, a huge expense is being recognized from program hosting

and data backup.

94. Network security products
95. Telephone
96. Content filter for firewall: CIPA compliance
97. Servers
98. Copying/printing equipment/contracts
99. Content filtering since it is a requirement for CIPA
100. Fiber connections drops from ISPs.
101. Voice Service: in a rural, under-served area as is most of VT, our voice service is integral to the operation of the library. It is a costly line item for which we used to receive and appreciated a 80% discount (recently). We are a small private library in a small rural town of 2000. Our budget is tight; we are not municipal.
102. Add USAC staff training so we can finally get paid.
103. Hardware
104. SPEED in reviewing applications
105. Voice: communication is a vital part of every day.
106. Telecommunications
107. Telephone services
108. Antivirus and malware software & cloud back-up services: in this day and age not having protection has become a very high risk. However, the growing cost of the service along with the low school budgets are forcing the schools who rely on E-rate the most to compromise their systems.
109. Wi-Fi for low income students at home: it's about equity
110. VoIP
111. Category 1 phone and VoIP service discounts: our county district just does not have the budgetary means to provide the internet, network upgrades, and phone costs without assistance.
112. Maintenance support
113. Voice/ VoIP
114. More support for voice services because the increase is killing us: we have to find other funding sources, which many times means budget cuts in other areas.
115. Restoration of full voice
116. Network control software programs and filtering: both are imperative to manage CIPA laws and to manage the network and its traffic.
117. Web filter: it is an extension to the internet service.
118. Special WAN fiber builds that were

started "before" they became eligible

119. Cloud internet filtering for CIPA compliance on remote student devices
120. Telephone service (I'd like to see it added back.)
121. Restore phone and cellular service
122. Allow NIF areas/sites to also participate.
123. Bring back voice service discounts.
124. More of discount percentages for both Category 1 & Category 2: our funding cannot provide enough each year with budget cuts.
125. Servers: they are costly to replace; software
126. VoIP / phone services
127. IT staff
128. Telephone/VoIP phone systems are essential to schools.
129. Phone service
130. Technology upgrades: we have great internet and better phone system but all our computers school wide are very old and can't keep up with demands.
131. Computers
132. Voice services
133. Voice (telephone/cell phone) service
134. Mobile Mi-Fi's; rural area and many students participating in extra-curricular activities can work on the bus
135. Phones
136. Telephones/cell phones: we now use money we would have used for students to pay these services.
137. Student web-based instructional software for math and reading
138. More end-user product
139. Telephone
140. Put back phone systems. We have had the same system for 18 years, therefore, never used E-rate to supplement it and will need a new one some day. This will be difficult for the district to pay for alone.
141. Telecom
142. Wireless connections in the classroom moved to Cat 1.
143. Student devices for students who cannot afford them
144. Student internet for use at home for online program or after school work
145. Website
146. Voice Services: VoIP primary; cellular secondary
147. Internet content filtering services: not only is it required in order to receive E-Rate, but it is also a necessary component to delivering internet to a school or library.
148. Redundant components that are essential to ensure continuous connectivity
149. Voice services
150. Internet at non-public training facilities
151. Continued telecommunication support
152. Wireless data services for students since school is extending beyond traditional

walls; poor, rural students need access to internet but can't afford it.
153. Category 3
154. VoIP services
155. Wireless phones
156. Could internet workstation reimbursement be added to E-rate on a 3 year life cycle? We provide 1000's of workstations for our public to use the internet.
157. The old system
158. Add back telephone service.
159. Hosted telecommunications service
160. VOICE, VOICE, VOICE: schools need VOICE!
161. Would like voice discounts to continue
162. Telephone and website
163. Continuation of voice coverage which is a large expense for our library
164. Voice services renewed
165. Administrative costs to the applicant should have some value to be included in applications
166. A shorter equipment time-frame. Our system replaces routers on a 3 year cycle so we can't apply for E-rate funding because the rule is 5 year life.
167. Phone Service
168. Hardware

Wireless data services for students as school is extending beyond traditional walls.

169. Allow network service to include AD and GPO services; having connectivity is great but if user management becomes a bottleneck it is not as good as it can be.
170. Just give greater discounts
171. Protection against network threats such as DDoS attacks
172. Training
173. Security systems (camera, etc.)
174. End-user devices & servers
175. More for POTS
176. Data backup solutions (cloud & on-site)
177. Funding for broadband on buses and to the community
178. Mobile hotspots: high circulations in the library supports the educational goals of our community
179. Cloud hosting services
180. Environmental monitoring and control system: our space is limited. When installing equipment in a room to limit access, the equipment must be kept at a moderate temperature, as the internet wireless system is the backbone to everything else the library functions.

E-rate should support the care of that equipment.
181. Basic telephone: for our smaller libraries this funding stream was very important to them.
182. Allow all states to include Pre-K. Unfair for those that states do not include.
183. Phones
184. Continue voice
185. No CIPA compliance for Category 2: most libraries in our system are not in favor of filtering and so miss out on almost all E-rate with legacy phone service gone.
186. Non-caching servers: they are needed to maintain connectivity and are super pricey.
187. I would keep voice services which are especially important for rural schools.
188. Cellular data services for low-income
189. Simplify forms & use the previous year's input w/updated info.
190. Voice telephone: put back on ESL.
191. Telecom service restored to discount level: we have streamlined but it is still necessary
192. Internal and external network security: it is part of the internet connectivity reliability / quality.
193. Phone/fax: we are faxing for the public more now than ever.
194. Network infrastructure: to carry traffic within our buildings
195. Web filtering: E-rate requires it so why not fund it?
196. Technology distributors
197. Give back the phone service. We are rural school and the phone bill is a pretty big bill for our school district.
198. Cell phone for school communication
199. VoIP telephone installation services: it is very costly to a school district when having to replace their VoIP phone system
200. Hosting services: we are almost required to have hosting options to meet E-rate rules.
201. Phone service
202. Because of high-stakes testing required by states and DDoS hacker attacks of networks, having a redundant internet service that is E-rate eligible is almost as critical as having internet service to provide consistent reliable service to our student and stakeholder population.

203. Reinstate telecommunication services.
204. VoIP
205. Back up Internet connection for when the original line is out. Also, off campus Internet for student use
206. Bring back voice
207. Telephone services
208. Email/web communications: these are means to expand communication.
209. Voice full discount
210. Provide hotspots for students that do not have internet at home.
211. Off campus data access and filtering for students in programs.
212. Equipment: servers specifically
213. Computer leasing
214. Hosted service /with phones
215. Server maintenance!!!!!!! Small schools cannot afford to have certified server technicians on staff and server maintenance is critical to a school's viability in today's world.
216. While most everything can be done online, we still have a large number of people who want to do things by fax or phone, and we are still providing a public service with the phone service. I don't understand why this would become an item that is not going to be supported by E-rate in the future.
217. VoIP
218. Computers: for up-to-date equipment to service the area
219. Voice
220. Computers, Chromebooks, laptops, tablets etc.
221. More Cat 2
222. A base level of funding for some voice service (phasing down to 20% instead of 0)
223. Voice Communications
224. School servers: they are critical to all the connectivity.
225. Bring back funding for voice services!
226. Computers or interactive panels: to teach to children they are a MUST have in school districts; difficult for school systems to purchase and refresh as necessary.
227. Internet access at home for students
228. Servers
229. Voice
230. Bring back voice. Hopefully, the declining application numbers shows this was a bad idea. In addition, it would be nice to have funding for security products as this has become a huge lift for everyone. The last piece is to add funding for support. I'm amazed at how E-rate supports districts on the initial purchase, but there is no funding for maintenance. The cost of maintenance is just as high as the cost to buy and set up the equipment.
231. I would like to reinstate

232. Warranties
233. Phone service
234. Keep phone lines at full coverage. Rural areas do not have internet options.
235. Simpler!
236. More leniency with wi-fi hotspots when they can be used to provide better service to our patrons by allowing technical staff and employees to access the system when the wired system is down, or from other areas when traveling and getting back into the secure system requires a static IP.
237. Return telephone service as eligible for E-rate.
238. Voice services
239. Voice services
240. Voice services: that is a large expense for our district and CTF discounts are very minor.
241. Phone service
242. Upgrade and repairs for hardware: it gets out-dated so fast.
243. Internet filtering service
244. Website hosting: it's too expensive.
245. Internet filter: it is a requirement for E-rate funding and it can be extremely expensive.
246. Cellular phones: we are on 65 acres of property, and in multiple buildings across that property. Obviously we need our regular phones in the offices because of how rural we are. Most cell phones don't ever work in the buildings with limited connectivity outside of the buildings. If an administrator or anyone else is between locations there is no way to get in touch with them without cell phone access.
247. Telephone services & internet connection
248. Content Filtering: mandated that you be certified CIPA compliant
249. Phone service
250. Return funding for POTS and Centrix service. Rural schools still rely on them, and a 10% refund is ridiculous.
251. Reinstate voice, long distance, wireless communication. All schools continue to need and use these services
252. End-user equipment: computers, projectors, etc.
253. Maintenance: it is very expensive for the rural districts. We cannot afford qualified maintenance staff.
254. Telephone service
255. Network support hours
256. Telecom equipment: expensive for district
257. Content filtering because it's required
258. Ability to buy servers
259. Maintenance; upgrade connectivity
260. Telephone discount to continue
261. Online software license renewal

262. Just simplify it and make it clear who gets what money and why.
263. Hardware/ computers
264. Filter because it is a must have to qualify
265. Mobile data services
266. Keep voice communication (telephone): helps my budget!
267. Acquisition and maintenance of public PCs
268. Continue phone service
269. Telephone service: this is still a big service in schools and it is a form of communication for the schools to the home.
270. Secondary fiber solution for persistence
271. Phone service
272. Add voice services back for districts. Communication is very important and costly.
273. School to home connections
274. Voice services in all forms: Voice services remain a vital part of the instructional process.
275. Restore telephone
276. Home internet access for students
277. Increase budget allocation per student
278. End-point computing devices: budgetary constraints play an integral part in funding end-point computing replacements
279. Servers: they are needed for network functionality.
280. Allow all hardware not just if used for certain purpose
281. Telecommunications: we keep our phone lines and internet access separate so if the internet goes down, our phone will still work.
282. Simplify the entire process! It costs way too much of my time to figure how to do everything.
283. Filtering: we are required to have it but it's not an eligible service.
284. Filtering
285. Content filtering: this is something that is required to be in compliance with; it would be nice for this to be an eligible service.
286. Fiber connectivity to the provider
287. Internal equipment to provide direct services to patrons
288. Computer updates
289. Support for the library to make broadband accessible beyond our brick and mortar building
290. Money for computers
291. Web hosting: it is a way to get information out to public.
292. Voice services: phone service is expensive and now it takes away from other district technology initiative budgets.
293. Telephone line service: discounts available to all districts

294. VoIP systems: they are the "norm" now and are vital.
295. POTS phone: being phased out and small schools need it.
296. I would add Telecom/Hosted VoIP services back
297. VoIP: necessary communication tool
298. Redundant connections: internet access is mission critical. E-rate acknowledging that and allowing for some redundancy capabilities is vitally important to any E-rate participant.
299. Phone service: we have to have it.
300. Voice as Category 1
301. Big ticket items: Robots, CAD printers, maker space equipment, wood shop machines, automotive etc
302. Hotspots to circulate
303. End-user computing device refresh
304. Intrusion detection
305. Wireless APs etc. should be Category 1 because at least half of our internet is delivered to wireless devices. What good is Gigabytes of data if I cannot deliver it to the devices?
306. Reconsideration of Category 1 services
307. Telecom services to be reinstated
308. Resurrect discounts on voice. That has encouraged us to integrate it into our newer technology infrastructure.
309. Computers for 1 to 1 initiatives for students
310. Continued funding for local voice service which is being discontinued after FY17
311. I think some portion of the cost associated with filtering and antivirus protection software and services should be covered. School districts are required to filter district internet access on and off campus yet we get no financial support in order to meet those requirements. Filtering and antivirus cost my district about 12K per year in services alone and we get no help with covering that cost. That's expensive and we are a small district. The larger the district, the more it costs.
312. Content filtering: it is required. It is RIDICULOUSLY expensive. If it becomes eligible, the price becomes transparent and the cost will go down!
313. Phone equipment: costly to convert to newer phone service options with old equipment/technology
314. Monitoring tools
315. Faster internet speed
316. End-user device maintenance: for those of us with no IT staff, the access is no good without working equipment.
317. VOICE!!!
318. Ability to purchase computers and/or tablets
319. Provide student internet service while not at school facility.
320. POTS/ Centrex telephone service:

necessary for business and safety

321. Firewalls
322. Security products, web filtering, data center products, storage which are critical to a network
323. Subscription based public computer systems
324. Keep helping with phone service!
325. Storage (SAN)
326. Content filtering: CIPA is required to

345. Content filtering: it is a required element for schools with an internet connection.
346. Telecom
347. Hotspots such as Verizon's Mi-Fi or Kajeet to cover students without internet access at home.
348. Telephone is more important to us; we have great internet access
349. Bring back all non cellular voice products. The universal service fund is

368. Cell phones
369. Telephone service: this is a major expense to our district.
370. Dual/backup Internet connections
371. Backup internet connections: connection to the internet is now critical and internet interruptions cause major disruptions to classroom instruction and affect student safety.
372. CIPA Filter
373. Servers
374. VoIP phone service
375. Filtering or backups: both are essential, even required by law, but not covered and expensive
376. Telephone service
377. Internet filtering
378. Automatic application covering years of a contract
379. Mobile phones for emergency communications
380. Redundant link: redundancy is becoming mission critical
381. We would like to see phone services continue to be covered. We are a very rural school district with the bare bones in phone service, and our budget is stretched thin. With the gradual decrease in E-rate funded phone services, we are feeling the financial burden.
382. Voice service: it is an essential part of our business
383. Voice: most school districts are not ready to go to a completely data environment and still need funding in this area. I believe before no funding is given, a more in depth look should be given at the districts that are still using this. Maybe cut the funding percentage but continue to fund until E-rate can tell the request are actually getting to be fewer.
384. Cell phone
385. Expand and continue phone service. Add cell service.
386. Filtering support
387. Devices: we cannot purchase them without additional funds
388. Redundant internet connection, school productivity and student learning stops without the internet. Two of our four core subjects have online only resources.
389. Telephone services
390. Wiring of new buildings or rewiring: all associated with connectivity
391. Firewall/content filtering solutions
392. Bring back phone services. This is where we save the most money via E-rate
393. Continue POTS/CELL: large cost for our district and increase the amount of money for Cat 2 funding
394. VoIP phone service

Managed web security services to ensure the protection of instructional systems.

participate in E-rate but CIPA compliant devices are not financially supported.

327. Video or tele-presence connections: it allows for resource sharing without the travel.
328. Servers
329. Server hardware supporting virtual end-user machines used primarily for internet access: even though internet bandwidth and internal connections are robust, a deficit of server space to support adequate processing for end-user throttles performance of connections; and/or non-virtualized end-point devices for internet access e.g. public desktops
330. Internet for buses and homework
331. Subscription services such as Netflix, Amazon, and Hulu
332. Mobile devices for low income students
333. Video conferences equipment
334. VoIP used to be supported and is going away so it costs us more now.
335. PHONES: IT'S EXPENSIVE.
336. Cell phone service reimbursement
337. We miss not being reimbursed for our voice lines.
338. Fiber: for real instead of pretending
339. Landline phone service
340. Bring back the voice services for the districts.
341. SIP trunks used for voice: if we are being encouraged to purchase larger bandwidths, the trunks used for Voice (which is a very important service) should be eligible
342. Website: very expensive for small districts
343. Telephone services retained: keeps telephones in classrooms
344. Server hardware and software: you can't get to the internet without at least a DHCP server and a DNS server. What good is a switch if I can't get an IP address?

on all our phone bills and that collects money for the fund. Either bring back all non-cellular phones to be eligible or start taxing the internet providers to collect more money for the fund. This just does not seem fair. Our district is hurting with the phase down of voice products.

350. Filtering: It is required by E-rate and it is a necessary item.
351. Web hosting
352. Not eliminate the phone service
353. Return servers to the eligible list to keep our network up-to-date, reliable, and secure.
354. Phone
355. Voice or hosting services more recurring services: some schools are falling out of the program.
356. Telephone (ours has been taken away)
357. POTS
358. I would expand eligibility to off campus student connectivity
359. Student home internet
360. Summiting any forms all year like a real business
361. Free
362. Voice telephone service because that's what pays USF fees and is vital to conducting business in schools
363. Continue to fund telephone service
364. Restore voice service. It was a major funding source for our libraries.
365. Voice
366. Managed web security services to ensure the protection and integrity of core infrastructure and operational/ instructional systems for K-12; Why? increasing threat landscape; increasing risk for district vulnerabilities; K-12 staff skill sets are not keeping up with demand and deep levels of exposure and risk for institutions, staff, students, parents.
367. Attorney fees

395. Secure web gateway/filtering products: these are critical today, but often too costly for small, poor districts.
396. Adding phones back
397. Telephone service: must have to communicate with parents and emergency needs
398. I would like to see voice services funded again because it is a critical part of school communications.
399. Student devices
400. Server maintenance
401. Content filtering
402. Internet connectivity in our rural households where there is currently none available
403. Internet filtering: it's required by CIPA, but not eligible for E-rate.
404. Local/LD phone service: this is pertinent to the classrooms/students/staff.
405. Bring back the telephone discount.
406. Servers and data storage appliances due to costs: it used to be covered from my understanding now it's not.
407. Phone systems and phones because they are necessary communication items in the classroom
408. Telecommunications
409. Voice
410. I would continue to allow VoIP and PRI service to remain eligible after the phase down. The need for cost allocation would be lessened, leading to fewer unnecessary audits and more time spent on more important matters to E-rate.
411. Bring back telephone service. It is expensive and we had become dependent upon it. Also add off-site internet access for students.
412. Web hosting: expense and importance
413. Dark fiber easier to apply for

421. Standard telco: it is a necessary communication and safety tool.
422. Content filtering and servers
423. Internet content filtering: it is require for eligibility for the program and is part of many firewall services anyway.
424. Voice services: non-cellular
425. Keep telecommunications.
426. Update how to apply guides for untrained admin.
427. Filtering products/services, whether bundled or not: it is an unfunded mandate.
428. Reinstate voice-only coverage! We are not interested in filtered internet, but E-rate was a godsend to help cover our phone costs.
429. Our phone service is no longer eligible. Why?
430. I would like to see VoIP changed to a Type 1 service rather than including it with legacy voice. VoIP is far cheaper than POTS and should not be considered the same.
431. Voice
432. Filtering costs
433. JUST MAKE REPORTS EASIER
434. Website management: so many of our services are now offered online and combining web master duties with other duties is difficult to manage.
435. More bandwidth and faster speeds
436. Computers or devices for access
437. Ability to purchase laptops and/or tablets: this would allow our school to go completely online for all textbook adoptions. It would also bring us closer to the goal of having a computer for every scholar to use at school.
438. Data plans: for backup support when connectivity not available
439. Firewall maintenance because for some

effective communications
448. Virtual private network because it's a cheap method to get a WAN
449. Filtering
450. Mobile hotspots
451. Pay for the filtering you require for participation.
452. Telephones
453. Redundant internet
454. Telephone services
455. Redundancy in circuits: we cannot afford to go down. Content filters are also very expensive.
456. Redundant internet and connections
457. Any core/internet equipment housed in the data center
458. I would take basic maintenance into a different category, because we spend many dollars in maintenance and this is counted against our schools
459. Keep voice because it's a large cost area
460. Phone/VoIP: emergency and parent communication via telephone service is not optional.
461. Support that is consistent from one person to the next
462. Firewall; support
463. Cat 2 for ESD-ESA's and filtering
464. I would keep telecommunications services funded at 80%.
465. I would continue allowances for voice service discounts due to the growing need for outreach services requiring the use of mobile phones for communication.
466. VoIP
467. Cellular voice and data
468. Wish you would bring back telephone services
469. Voice
470. Webpage housing and updates
471. E-rate consulting services
472. Basic maintenance handled as Category 1: just fund it.
473. VoIP Communications
474. Video services
475. Phone service
476. Would like to be able to apply for equipment and connections when needed such as when construction occurs
477. Allow for multiple ISP vendors to provide district wide broadband since reliability is sacrificed when forced to use only a single pipe for all schools in the district.
478. Websites: it has been funded in the past. This is where so much of our students and parents access information and databases. It is absolutely necessary to have in this day and time and if the goal is to make resources more available for students, teachers, and parents then this is a must! There's no reason it should not be funded.

Internet filtering: it's required by CIPA, but not eligible for E-rate.

414. Continue phone service.
415. Cell service: we need this. You all do not have any sense of reality if you think we are all just able to use traditional WAN technology!
416. Server
417. Telephone
418. Voice Communications
419. Fiber moves (being forced to move fiber because of construction or other documentation that supports this need)
420. Filters and anything to help with cyber threats

reason it is ineligible
440. Hotspot Wi-Fi: our patrons love this.
441. Technology staff; hotspots to lend patrons.
442. Better website
443. VoIP, hotspots, Wi-Fi
444. Public computers (the hardware): connectivity is great but if we can't afford to replace our computers, the benefit is limited.
445. Bring voice back
446. Servers added to network hardware
447. Telecom collaboration hosting for more

479. Failover/redundant connections for regional networks and/or ability to use 2 vendors to create divergent paths for critical network reliability
480. Phone service: ridiculous to remove it
481. Return of telecom: has always been one of our main interests in the E-rate program
482. Keep the telephone discount the same as our internet discount
483. Cellular data for teachers that must reach out to students in remote areas
484. Mobile hotspots: this is a way that libraries can reach those without internet at home but for a library our size, it is too expensive to offer as many as would be desired.
485. VoIP equipment; phones
486. Phone systems
487. Mobile hotspots
488. Voice: we did not qualify.
489. VoIP: an absolute must for schools and a financial burden on the local budget which deters funds from other programs/projects to pay cost
490. Student devices: OK so now we have a great infrastructure, can we afford all the devices students need?
491. Voice
492. Support maintenance on existing Category 2 items
493. Add back voice.
494. Server
495. Voice!!! We still need telephones in libraries and by not funding them, we have to divert money from our other telecom needs to pay for them. So, we can't afford to increase broadband or expand the wireless network because we are now paying 5 times as much for our phones.
496. Reverse the decision on voice services because voice services are still a large part of doing business.
497. Funding for back up internet services connections
498. Voice services because they are expensive and vital
499. Content filtering
500. Expand firewall or threat prevention
501. Voice telephone service
502. Computers, interactive displays
503. Phone services and equipment
504. Go back to funding voice services. They are still needed
505. Content filtering
506. Self provisioned dark fiber: once it is placed there should be no requirement to bid for lit subscription service. At that point, you are simply asking for maintenance on an installed product.
507. Reinstate phone service.
508. Allow 1 level of redundancy for equipment/services (e.g. a secondary internet connection).
509. Cloud based services for student instruction

510. Bring back voice service: there is a serious need!
511. Less data should be provided by applicant to apply for funding
512. Voice services for emergency lines and child transportation
513. Internet filtering because it's required for E-rate compliance
514. Servers; content; web; mail
515. Local/long distance voice (if it is going away)
516. Telephone: such a big expense
517. Traditional telecommunications should be returned to original funding levels. This provided all schools with a simple predictable funding source.
518. Cellular for anything, including data, on any device
519. Filters
520. Local/long distance telecom (Category 1) and supporting telecom infrastructure (Category 2)
521. Phone service: schools need phone service to communicate with students, families, and the communities we serve
522. Community Wi-Fi: we would like to offer students access at home for 1:1 device roll-out.
523. Voice services
524. Data service (and the equipment necessary for it) on school buses because many of our students still do not have adequate internet service at home and this would provide up to an additional hour of access for them each day.
525. End-user devices: they are vital to using the services.
526. I would strip some more things out. Basic maintenance, for example, is obviously not part of the intent of the original legislation

1. Slow going to vendors
2. We use the SPI method which works well with our current ISP.
3. Would like for it to be consistent and the process stays consistent: since phone reimbursement is ending, it is a moot point anyway.
4. I like the new payment process. We now receive our reimbursement much quicker than when we did it by mail. What I don't like are the increase in reimbursement reviews especially for the same FRN for consecutive billing periods.
5. We like that we receive our E-rate discounts on monthly telephone bills.
6. Payment should be paid to school districts.
7. FY16 Form 498 was cumbersome. We expect less than 2 weeks to receive reimbursement.
8. EPC is much more complicated and USAC has lots of errors that need to be corrected. It does not work and schools are not getting their funding.
9. My biggest frustration with the E-rate program is the lack of transparency, especially when it comes to the invoicing department when BEAR or SPI requests are submitted. It seems to take months for that department to review the documentation and then if they don't like the documents that were sent to them, they deny the request without telling you why, then you get to start the process over by calling the help line to ask why it was denied. I believe they have to escalate the question because they also do not know. It seems if you receive an approval funding letter for say wireless access points and submit an invoice to them showing the access points were installed/purchased, it shouldn't take literally months to get the payment. One of my schools has been waiting since January for a payment. We are on the 5th reimbursement request and I'm not confident this will go through.

The school is waiting on this payout so that they can purchase their switches, which were also approved by E-rate. They wanted everything installed by April for testing and couldn't do that. Now, they're hoping for summer but we have no idea if they can. It would be nice if the invoicing department was quicker, more communicative, and less stringent on how the invoices look. Applicants really have no control on how vendors send their invoices. One other major frustration is the lack of ease of EPC. I understand the thought behind EPC but it just doesn't work well. Three times I had a 471 just disappear from my tasks. The first time it happened the help desk was able to restore it within an hour. The next two times we were told we had to wait 24 hours to see if it would reappear. No one has 24 hours to wait, especially closer to the deadline so we ended up re-doing it. There are just too many bugs and after two years and since it is day in and day out, I still don't know how to work all parts of it. It's just not intuitive. Another major frustration is the way USAC treats vendors that have been under scrutiny. Instead of making applicants jump through 100 hoops to get a payout from these vendors, maybe don't allow them to participate in the program. I think it would be better for applicants to choose upstanding vendors so that they know they will get their money back in a reasonable amount of time. Literally waiting almost a year and 3 audits later to get an internet reimbursement seems unnecessary. The last major frustration is the building Cat 2 budget: with the student population changing year to year and the amount per student, it is virtually impossible to track this. I agree that you should have to tell USAC where the equipment will be installed and which students will use it, but I strongly agree that this should be figured by

district and not by building. It's just way too cumbersome and I don't think it even makes sense. Some districts aren't able to use their entire Cat 2 budget because they run out of money in one building and need something for a different building but can't transfer that money. I'm not sure why this should matter. If the money is there for the students, allow them to use all of it.

10. Long delays
11. My only comment is the review process needs to be handled better for the reimbursement reviews. Very frustrating when I would receive a request for documentation, and I would supply that info to USAC stating for them to get in touch with me if they needed anything else and wouldn't hear a word, then would receive the BEAR NL showing $0 was approved with the reason being something that I could have fixed had they reached out to me. So, then I have to file an appeal, wait for the appeal to be approved, file another BEAR, then get another review asking for the same exact info as before, and they can't go back to that review and look at the documents that were previously provided, so have to send them a second time. There is no reason this should be happening. It is such a waste of everyone's time and is so unnecessary.
12. The new Form 498 ETF process is much better but the invoice review process has become more onerous and difficult since EPC profile information is ever changing and invoicing does not always keep up with the changes in addresses, site names, etc. It's almost scary to submit an invoice anymore because you can be denied payment for something even though you went through all of the trouble to apply and get approved.
13. It is adequate.
14. It should not be so difficult.
15. I hope Cat 2 will reset and remain

16. funded. This has been a huge thing for my district. We couldn't have had the opportunity without this program.
16. The EPC is very cumbersome, not user friendly. Tasks that use to take me less than 1 hour to do, now take me hours to do as you have to click back and forth and the notifications are difficult to read.
17. We use the SPI process but our service providers provide little in the way of information on what they invoice to USAC so it's very difficult to monitor their discounts

29. I don't handle the accounts receivables but I think 90 days then issue the money is good. Gives you time to go over things and gives everyone to get their forms in to you.
30. If E-rate was the only job responsibility I had it would not be as difficult. Managing my department and responding to in-house client needs on a constant basis doesn't leave a lot of uninterrupted time to work the E-rate process. The new EPC website has some good features but it is extremely difficult to deal with

withholding of payment. Technology took all of the blame for this. All building level TCs and technicians were cut as well as budgets for equipment. We are entering into our third year under these financial constraints. Because of E-rate, technology here continues to plummet toward the state it was in a decade ago.

It is frustrating not to be able to check the status of the payment.

18. The setup of our school has now been redone three times in 9 years. Not happy with cumbersome changes that seem to show no benefits to E-rate or us. Cat 2 funding does not meet small school minimum needs. Only fair and weighted or rural schools.
19. The new payment process is a lot faster, but a nightmare to get setup.
20. With the EPC issues, delayed funding commitments have caused service provider delays in invoicing.
21. Process moved to a E-rate consultant as it became more complicated to keep a handle on from year to year.
22. Getting commitment letters earlier would help with the ordering and installation of services/equipment before the beginning of each school year.
23. There were numerous difficulties along the way (both from USAC and local/state rules) that prevented us from filing in a timely manner. It was highly discouraging and frustrating.
24. I have used both methods and prefer the BEAR
25. Would like comprehensive, timely documentation on all check-to-bank transactions
26. Slow
27. Everything should be more timely. It is very difficult to not know funding commitments when we are planning our budgets. Then our credits do not appear until way into the fiscal year, making cash flow and budgeting very challenging.
28. Payment process now flows much quicker via EFT's than earlier process - thankfully. Getting districts set up via 498 process was cumbersome though!

all the quirks it has and it possibly has the most convoluted interface with which to deal. It is difficult to find what and where you need to input data. To enter some data you have to continue to restart lengthy processes from the beginning instead of doing something straight forward as entering into a table. The same information has to be re-entered over and over when once would do. The email messages generated from EPC leave me mystified as to the reason I am receiving a notice. When I follow the email embedded link into EPC there isn't enough information to understand why the message was sent.
31. Did receive the payment through direct deposit quickly.
32. When it came to doing the BEAR invoices, I needed a pin number. We have someone in another office and would certify/approve the documents with a pin number. I asked to be issued a pin number and never received one. There's not much point in going through the process and not be able to clear the invoices for the reimbursement.
33. My biggest concern remains the phasing out of the telecommunication services. School districts still have to pay for these services regardless of being phased out AND the USF fees are still being collected by the FCC. So I see no reason why these services are being discontinued. I am very concerned and frustrated by the phase-out.
34. It has improved this year with direct deposit. However, I don't always know when they come through, because EPC only notifies the financial contact.
35. Answers to appeals take too long.
36. Our district was devastated by the

37. The process is much better with electronic reimbursements going directly to the district. Purchase orders for Category 2 process is more difficult due to campus budget cap.
38. I've not filed the 471. Frankly, I didn't know if the 470 "took." The new "center" has made it much more complicated. A library director now has so many websites, newsletters, list serves that valuable information is lost. I wish you'd go back to the rules you had 5 years ago. I could handle it then. It's frustrating because my organization is missing out on assistance. However, the multitude of briefs you send out and the new "service center" website/database you set up have made it difficult to fit in the E-rate application process with all of my other responsibilities. We are a small library and cannot afford to hire a consultant. What makes me sad is that my library is missing help it could use.
39. Payment to the service provider is sometimes delayed for several months resulting in high bills for part of the year.
40. Better with direct deposit
41. It is frustrating to not be able to check the status of the payment. Although if this is an option in the new system, it is not easily found.
42. Confusing the first time
43. Burdensome on applicants and service providers
44. When discounted rates are used this is not a problem, but when it is a matter of billing then it sometimes becomes a problem.
45. E-rate has been lengthy and cumbersome.
46. The invoicing for BEARs has now been handed over to the districts. The process of verifying the invoices is very time intensive and the reviewers are very quick to deny claims. The BEAR process is by far the most frustrating part of the E-rate program.
47. KEEP IT OUT OF EPC. It works better than EPC. Don't break it by putting it in EPC.
48. Cumbersome, difficult, and you don't explain it well.
49. Unless the process has changed this year, one has no idea when to expect reimbursement.
50. The PIA reviews are RIDICULOUS! We

receive funding but then the PIA review comes back and denies things that were approved. This is very unfair to a district. It also majorly affects budget! Once the money is spent and we are expecting reimbursement, we cannot UNDO this! I've been doing E-rate for 18 years and never had as many issues as I have this year. It's very frustrating.

51. A bit difficult
52. Complex process
53. Need more information from USAC on full or partial BEAR denials
54. Again the process would be so much easier if they just gave the money to every school/library based on a per student amount. This would do away with this whole cumbersome process.
55. The Form 498 process is confusing and glitchy. We should be able to immediately upload the banking verification document in EPC rather than going to an obscure page in E-File. Also, USAC suddenly decided that my 498 wasn't approved after I had already been approved and received a direct deposit. I have no idea why I had to submit the exact same documentation again.
56. It's very unclear to me when we'll be reimbursed. We've not seen any money yet for FY17. Would like to have known sooner that payment would not take place until the next fiscal year.
57. I am listed as a consultant since I file for our schools to take the burden off of them. However, I list a person at the school as the main contact person. Last year I was not notified when a request for additional information was made. It would be helpful if consultants were notified at the same time. I will be listing myself in the future as the main contact person, so that will help with this in future funding cycles.
58. It works well with my district
59. Wish you could take the most rural areas/ states and their needs into consideration. Phone service is a biggie! Not all areas of our state of Vermont has the ability to have internet connectivity. We all need phones.
60. We are still waiting to get paid for 2015 due to USAC changes and USAC not processing our forms in time. We are giving up on E-rates.
61. E-rate funding has been a tremendous help for our school district.
62. I haven't received payment yet because of the 498 delay
63. Thank you for providing funding for internet connectivity. Without your support, we could not possibly fund internet for our students.
64. Our service provider does the SPIN method and it has worked well for us.
65. Arduous. Too many ifs and buts. Can't

really know even if approved and the equipment is ordered that you will get reimbursed and that you have to get every receipt/deposit/canceled/ everything.
66. Just that the new web portal is incredibly difficult and non-intuitive to navigate. It could use a lot of work.
67. BEAR is no longer used due to electronic transfer, so we don't directly deal with payments.
68. Website needs better flow.
69. New way to decide how you want funding to either your school or to the vendor seems to work well.
70. I like having the funds direct deposit but I would like a notification when the funds are there
71. It's much better having direct deposit. It's very quick.
72. Like the way funding is now coming directly to the School District (applicant)
73. I had difficulty submitting my 471 because I was unable to update my information for library. Our BEN was changed and that made answering entity questions frustrating because I had to use the old BEN number. I could not answer those questions with the new BEN number that was given to the library. I had to redo the form with all the old information and try to put the new information in the narrative. That makes me feel uncomfortable because I am afraid we will get the wrong discount rate.
74. The direct deposit electronic payment process is terrific.
75. Our school had an ethical problem being required to get direct deposit setup with their bank account. This was because of strong advice from accounting firms specialized in public schools and concerns about that information being co-opted by other parties to steal school funds. Since there was no alternative, the school agreed to this. Please work with school finance experts, state officials and security experts to somehow resolve these apparent policy discrepancies.
76. When all paperwork is complete, E-rate has a prompt response.
77. I am unsatisfied with how STRICT the "rules" are for asking for reimbursement. I would understand strict requirements for the application process but not to receive reimbursements.
78. It seems to be working better after you get the form 498 approved but that has been a hassle for one of my districts due to their entity name not listed the same on their bank statements.
79. Adequate
80. New website is somewhat difficult to navigate and find things. Also, currently filed forms waiting approval should be easily seen on dashboard. Some type

of notification on site that the form was received and is being processed would be helpful (like providing a status notification section).
81. It is very difficult to go back and forth between legacy system and EPC. Also this year, districts are telling us that they are not properly notified. We should be able to see when EBT goes through and the email should go to multiple people.
82. It's a Godsend.
83. I know it's complicated or I would find time to do it myself.
84. The modernization of the payment process has been great, but I would like to see upgrades made to the BEAR form to make it more streamlined.
85. Online is much more efficient than paper.
86. The 486 and 472 seem redundant. If a funding request is approved, USAC should just assume the money will be spent where the request said it would. You would need an audit no matter what in order to uncover any misuse.
87. More detailed information when payments differ from submittals.
88. I do like that the payments from BEAR go direct to bank accounts now.
89. Direct ETF is an improvement over waiting for vendors to release checks.
90. Simple process that is straightforward
91. After form 498, it is easier and faster to get refunds
92. ACH payments have worked beautifully (best improvement of the program).
93. I have not successfully filed for E-rate since USAC moved to EPC. I think my problem as been how to file for all libraries in our cooperative. I have received conflicting suggestions regarding how to file. Do I use one form for all libraries? I have always filed a separate form for each library. Suffice to say that I have not been able to file successfully since the switch to EPC.
94. I dread it every year, it just gets more complicated as time goes on.
95. In the past if there was an error on the BEAR form, we indicated an E-rate employee would reach out to help correct it. Lately it feels like the first years of E-rate where they are in "gotcha" mode. Not too friendly which makes you weary and not very trusting of the government program. We still must file as it is doing right by our students.
96. Filing in EPC will eventually become quicker as we all learn the system. Direct deposit was a good move. Statewide contracts are a move in the right direction.
97. I have not had any issues with the payment process.
98. I've applied for many years and every year it's a hassle. The rules keep changing

or getting harder to follow. The new website has been hard to navigate. I decided this year, it was not worth the trouble and did not turn in the 471. We are dropping it especially since the telephone discount was disappearing. Believe it or not, rural libraries still depend on getting a break in their bills for telephone when their budgets are so small. We're talking about a population of less than 2500. The choice of vendors for rural areas is very small and the options for internet service are tiny.

99. The initial setup was rather complicated. However, the end result was worth the trouble

100. Now that I have completed the forms for the last 3 or 4 years, I feel more confident about the process. It would be nice if we were allowed to update data at any time.

101. Too slow for USAC to reimburse small libraries that are cash strapped

102. It is beyond slow and unpredictable; while we try to use E-rate funds, we never get them in a timely fashion so they are really more of a hope than a budget consideration. The new ACH method of depositing funds was much better than checks, so that is an improvement.

103. Case managers/reps are switched off of accounts causing duplication of information to be submitted because the new one always says, "even if you submitted you have to submit to me again." Why? It seems like case managers could be a little more consistent or at least share information they have already obtained.

104. EFT works great.

105. It is a very complicated program with little return. Maybe for bigger places, it still works, but for smaller institutions, it is becoming too complicated with little benefit.

106. The payment process has improved. We have had a positive experience with the new process.

107. I really find the SPI format better if vendors actually do the credits in a timely manner. BEARs just take extra time but with the direct deposit, we do receive our funds faster.

108. For a larger district the PIA review process was brutal this year. USAC talks about easier, friendlier process but the PQA I went through was unprofessionally delivered and took 5 months to complete.

109. While the 498 was challenging to set up for our multiple consortium members, the payoff of direct deposit was worth it.

110. E-rate helps us to increase our broadband speed.

111. I find the online system much better and easier than the traditional paper process. The process for FY 2015-16 was exceptional! I was denied funding for one of my 471 because the SP failed to confirm the amount due. By time I realized this it was after the 120 and my appeal was denied. SP comment was "oops, overlooked the form". I liked that the reimbursement claim goes completely through USAC and the turnaround is quick.

112. Absolutely love the fact that USAC now reimburses applicants directly

113. Direct deposit is much improved.

114. Too complicated for a one-person library: use previous year's info and update the amounts/figures if there are changes.

115. Improved since electronic deposit of funds

116. Okay

117. Needs a big review: the applicant / beneficiary should be consulted on every single bill prior USAC paying them.

118. The 498 lookup tool leaves a lot to be desired!

119. I have not dealt with that process very much since we have a consultant that does all our paper work. It is a shame that small school district's feel so threatened by the process we have to pay someone to do ours. In some years we are basically giving the consultant 10% of our E-rate award.

120. Since direct deposit has become part of the payment process, it has been much easier and faster to get out reimbursements. I do like not having to wait on the vendors to sign off on the BEAR forms. It has cut down the steps of the reimbursement filings in half.

121. Payment process now works well. Process that needs work is the Form 471 review process that leads to the payment process.

122. Many libraries have elected to no longer utilize the program primarily due to telecommunication costs no longer eligible and the continue problems with EPC. A few things are easier with the program but that is offset by the constant problems (i.e. EPC) ongoing rule and program changes and the reliability of the system. Many libraries do not filter by the E-rate standards resulting in not being eligible for Category 2 services. With telecommunication costs no longer eligible, many single entity libraries are no longer eligible for any E-rate reimbursement. Due to the phase out of Category 1 and all the EPC issues, many libraries have made the decision to not

apply knowing the reimbursement years are limited and not wanting to spend all the time required with EPC.

123. BEARs should be submitted in the EPC system.

124. Payment process itself is OK via ACH.

125. The difficulty lies in the IT questions. Even our IT staff have difficulty determining what information USAC is seeking. The questions are too black/white and there is often a gray area.

126. The confusing part is not knowing clearly where things are located. I did find it much easier this year than last year though. It may be just getting used to a new way of doing things.

127. I love that they changed to direct deposit, as we pay the vendor and get refunded our portion.

128. Payments are much quicker and more timley.

129. Being a public institution, we prefer that our discount be provided through invoice credits, but the providers seem to take a long time to issue the credits once they have received all the paperwork, usually 3 billing cycles.

130. Payment has been received in a much faster time period since USAC began to pay applicants directly.

131. I like the new automatic deposit system.

132. It works but sometimes is a little cumbersome.

133. The whole process has gotten more complicated and clumsy each year. The EPC website is terrible with problems submitting through it, problems communicating through it because sometimes it's "down". All of the forms which were updated for EPC are now so much more complicated than they were before. If you could view the whole form and its questions, that would be helpful in gathering the info needed to complete the form. Instead, you must answer a question before you can move forward in the form, forcing applicants to find the answer to one question at a time, a cumbersome and tedious process. Also, it's difficult having all communication go through the dashboard or the news feed. Sometimes it's busy and we may not remember to check it. Why can't we get an email?

134. Needs to be more user friendly

135. We used discounts from our provider which works very well for me.

136. Some invoices take longer to process through on a state level even though they are paid with previous year's funding

137. Great first step in supporting schools and libraries as the cost for technology continues to grow: bring back support for voice as well as add funding support

for information security tools and add funding for maintenance and support. A fair number of schools and libraries most like have let their support and maintenance agreements lapse because they could not afford to keep them.

138. It can be very confusing.
139. Should all be discounted on bills
140. I think the payment process has improved.
141. Invoices are still open from 2015 and USAC keeps denying due to the fact that their invoice extension list not current.
142. Too much work: if the government has made the funds available, just give them to us without all this work.
143. Wish all vendors were required to participate in discounting their charges instead of the recipient having to pay up front and file for reimbursement.
144. Payment in the last few years has been prompt.
145. Direct payment from USAC should make for a smoother process.
146. It takes way to long to be reimbursed for Category 2 projects. In some cases, it has been over a year.
147. I think it is a necessity for funding for schools; however, with cutting off support for both land lines (or VoIP that we currently have), it has already caused a huge burden on technology funding, at least in my district.
148. I love that BEAR is now sent directly to the districts and not the vendor. In the past, it took a very long time to get reimbursed by certain vendors.
149. The current payment process is great once you go through the process a couple of times, allowing you to learn the new system.
150. It has been simplified.
151. Confusing and if we did not have help from the cooperative, we would not be able to file due to staffing levels at our library. TOO much time and confusion for the small "reward"
152. It is just OK.
153. Why can't payments be made directly to the payees? Instead of reimbursement through the old program?
154. Wish it could be consistent. We prefer discounted bills, but sometimes a vendor writes a check.
155. It takes too long to get the 486 reviewed and, from what I have observed, this has effected many districts.
156. Works pretty well for me
157. I like the way the funding is paid out.
158. Direct electronic payment is the preferred method.
159. God help entities that don't use a consultant. The E-rate process is the time hog of all time. I processed my own applications for years and will

never do it again. As is often the case, the government creates a program to benefit schools and inadvertently creates a niche business due to the unnecessary complexity of said program.

160. The current process is working. Don't attempt to fix something that's not broken.
161. I believe that the process is more organized through the EPEC portal
162. We normally get the discounts in our monthly bills.
163. Receiving the reimbursement is the simplest process and thankfully goes very smoothly.
164. The Bear (Form 472) is ease and fast. Payment is much faster than the old way.
165. We receive the discounted bill from

MERIT rather than a reimbursement from E-rate. We want to continue doing it this way.

166. It is hard to keep track of deadlines; hard to know what will and won't count in reimbursement; and EPC is not user-friendly or well-designed for the end user
167. Often, I have a hard time collecting my funds from the provider. Even tracking when payments come can be convoluted.
168. The process is WAY to convoluted. While USACs support has gotten better, the process has gotten MUCH worse.
169. The process is like getting through a maze. It is awful to use but you have to use it to get connected. I dread it every year.
170. It is a slow process.
171. This program is very time consuming and labor intensive. The rate of return does not justify the amount of time spent on submitting forms for this lousy program.
172. Payment comes as pass-through from our cooperative.
173. Never easy, and if there is an error, why is it not addressed early instead at the end of the audit and then denied?
174. Confusing; unclear
175. It has gotten better.
176. Because I am not a "business manager" I would prefer that the vendors could file the discount amount directly on our

behalf and bill us for the non-eligible amount. I do not like to do a BEAR! I have to get accounting/etc involved to try to get everything needed.

177. The SPI process is welcome. No longer allowing reimbursement to be sent to the provider for crediting future billing was not a welcome change. Our division does not control access to outside funds sent to us. They are deposited in a City account, and we may or may not actually receive them.
178. This is my first experience with Category 2 funding requests, and the process was painfully difficult. As a small school we do not have the manpower to handle this level of complexity on a regular basis, and I only did it because I felt the return would be worth the extra work. I am not sure I

> *I love that BEAR is now sent directly to the districts and not the vendor.*

was right.

179. Direct deposit works. Our phone bill is paid in full and a BEAR form is filed for reimbursement.
180. No comment
181. With funding commitment letters issued so late, we have issues with monthly vendors who apply the discount. We are required to pay 100% until the approval process is complete, then we receive bills with large credits for several months after the vendor starts applying the discounts retroactive to July 1
182. Much faster this year
183. It is much better now that the funds go directly to the applicant.
184. It was supposed to streamlined, but I don't think so. However, it has been a learning experience working with the process and rules changes from year to year.
185. As a district we are seeing reimbursements much quicker now that they are electronic and bypass the service provider.
186. Would like to see reimbursement information in EPC portal to make it easier to track 472 filing and reimbursements.
187. We had funding denied at invoicing (ineligibles) that were approved by PIA. Then the Form 500 process is very difficult as you have to return money by line item. I have a lack of trust with USAC. The new payment process was

difficult to set up as our district is under the county.

188. Sometimes confusing
189. I just do what I'm asked to do by our third party consultant; I don't really understand the different parts
190. Felt the direct deposit was over-reaching in information shared

Vendors report that the service provider invoicing is better than it has been.

191. Since this system is based on free & reduced lunch, I would like to see the funding divided up and handed out to each district without the bureaucratic process. Too much of the money is paid out for administration and auditing (probably more than would be misused). Send the money out and ask for receipts that show the money was spent correctly or send the money back. SIMPLIFY.
192. We use the discount option.
193. Vendors report that the service provider invoicing is better than it has been.
194. The Form 498 process for getting direct deposit has greatly helped our district to get our money.
195. In a small school district, people wear many hats and are limited for time. Process should be simple.
196. Difficult to get vendors to file the SPI. Funds come from the schools funds. Slow payment from USAC sometimes exceeds our external audit date.
197. Need better communications with service providers
198. Better with the Form 498 auto deposit. Was not smooth setting up the Form 498 and getting it approved. When I called the phone number provided, the man that answered could not assist me and basically just took messages. Not helpful. CSB also has to many new employees that have to get assistance with responses (long time on the phone not effective or efficient).
199. We use the discounted method and it is very smooth for us.
200. Payment process seems to work better than the application process.
201. Greatly improved with direct deposit to applicant
202. Way too complicated
203. It's a mess.
204. I like that it goes right to our bank. We get paid faster.
205. This is the worst run program. Tell me

one business model where this works. It should be an all year program and when the system runs out of money it stops until the next year.
206. Good
207. We are no longer applying as the percentage goes down and the work level to apply goes up it isn't economically reasonable.
208. One of our vendors (because of new/inexperienced E-rate staff) miss invoicing deadlines, and waver deadlines and have not credited all our FY2015 discounts. What is the remedy?
209. I could keep better track of my forms when they were on paper.
210. The entire process is horrendous. I have to go out to bid for equipment knowing that it will obsolete before I ever get a chance to actually purchase it. Technology changes much faster than this process and it actually hurts our students. I need the right equipment at the right time and in the right place. It shouldn't take 18 months to get an access point and then when building enrollments change be unable to relocate it. So frustrating!
211. Direct reimbursement to the applicant has been a vast improvement, but we have experienced denials, stating something was ineligible, after it was approved by PIA. Also, we received a denial without any outreach from a reviewer. When we reached out to USAC, we were simply told "file an appeal".
212. The E-rate program is dysfunctional in large part due to an enforcement culture pervasive within USAC and within the FCC. The modernization order was meant to simplify the program, instead it broke the program further. EPC was a disaster of epic proportions - absolutely no pun intended. USAC is a terrible administrator of program funds and should be investigated for fraud, waste, and abuse. The FCC should rid itself of key personnel who share the punitive approach to E-rate applicants. The E-rate program as it is currently run by both the FCC and USAC is a disgrace.
213. Ever since going to EPC it has been a nightmare to fill out the 471 for Priority 2 funding. The process takes 5 times longer as a small district. Uploading the

spreadsheet has never worked.
214. Good
215. Similar to issues experienced with Form 471 for FY 2016, there was limited instruction on how the BEAR conversion process worked, including forms required to set up direct deposit to our bank. We're past that now and it worked fine, but the ease of transition could have been better.
216. It would be great if all discounts were applied before billing, rather than some being subject to reimbursement
217. Getting approved is a big, cumbersome process and we have not applied for two years because of the time consuming and confusing process. One has to have a dedicated full-time person to follow the red tape.
218. We found that services from a local vendor were much cheaper than what we would have to pay and then wait for reimbursement for E-rate.
219. The E-rate payment process seems to work well.
220. Some things about the new portal actually help, such as being able to copy previous year funding requests. In general, the portal is difficult to use and not intuitive at all.
221. E-rate is very complex and cumbersome. We always have to work with 2 or 3 funding years making the process even harder.
222. The new EPC system is a challenge. The customer service request will issue the question asked but not the answer. For learning purposes, this serves no purpose. If questions are not allowed by vendors from a 470 then it should clearly state this in the rules, not as a reason to say that makes the 470 have an RFP or bid.
223. Fairly straightforward
224. Payments should go directly to applicants, not through a complicated 3rd party reimbursement process.
225. I have had no issues.
226. Works OK as far as I can see.
227. Appeals could be addressed more quickly.
228. Schools seem to be happy, vendors not so much. It was heard from vendors this year declined in providing bids due to the complexity and mainly the time frame it took for them to get reimbursed from USAC.
229. I like that we receive the reimbursement now. Sometimes it was hard to get the money back from vendors. I wish all vendors would use SPI.
230. Very helpful that vendors can be required to incorporate discounts directly into invoices
231. The paper work is ridiculous for the

amount of funds received for just regular phone lines.

232. It is the most complicated program I have dealt with in education in my 31 years that I have been involved. Now they are cutting the funds we used to receive.

233. Complicated and slow

234. The reimbursement process is great. Wish you could edit a BEAR after you submit to correct minor errors like last date to invoice or M&C type errors. Having to refile a BEAR to just fix a mistake is inefficient.

235. I require my vendors to participate in SPI billing so that I do not have to deal with the payment process.

236. It would be nice for the information to populate from previous request so you could just change the amounts and dates for the new request.

237. It is taking forever to get reimbursed off bear forms, there is never a good answer to where things are in the process or any timelines. I have now been waiting 3 months to be reimbursed over $1 million. On another application, I had to do a change of spin number due to error on 471 and very hard to know if done correctly and what the next steps are. Cannot ever talk to someone who can really give you a warm and fuzzy feeling when answering questions. There are too many steps and no one seems to know where your application is in the process.

238. It is ridiculous that this process is so complicated! The "portal" is really just a black hole of bureaucracy.

239. I was extremely displeased to hear that because our service provider failed to certify on time we lost our funding back in 2015. The fact that service providers no longer need to certify our BEAR forms should cause the FCC to turn back their decision and release payment to all entities who were caught up in that decision. This ruling hurt the school systems and had no implication on the service provider whatsoever. I am quite displeased with that ruling. Please revisit this.

240. Manageable

241. USAC staff are great, but it seems like each year there is another rule or change we need to comply with. No one in the district understands the entire process from start to finish and I have neighboring schools who have not applied because the process is so complex.

242. Vendors seem to be knowledgeable about their end of the reimbursement model and that end is working OK for us.

243. Payment process is not bad except that you have to use a separate system to file for it and the EPC makes it exceptionally difficult to find and file the Form 498 that is also required.

244. I like the direct payment to the bank. I did not like how complicated the process was to get the Form 498 certified.

245. I am glad to get help so I bow to the process as it would be convenient for those that I pay to get it done. Our area has a monopoly with only one provider. I wish that part of the E-rate process was to help discount and increase the speed of our services in this area.

246. Direct reimbursement has been wonderful, but with initial glitches, which suggests some cause for concern in reliability and long-term liability in cases involving mis-directed payments by USAC.

247. E-rate is no longer worth the time and hassle, especially now that voice-only coverage has been dropped. Most small public library systems do NOT filter internet, nor do they have the staff, training, or time to do so, not to mention cost. Eliminating voice coverage is a huge economic blow to small libraries like us that are barely scraping by as it is, especially now that nearly all calls are long-distance thanks to people dropping land lines in favor of cell-only service.

248. I am new to E-rate and it was difficult for me.

249. TOO HARD TO FILE REPORTS AND GET PAYMENTS

250. Windstream has been great with our voice line, however Time Warner took their sweet time with our internet access; we receive credits directly to our bill, and to me that should be easier for the service providers.

251. Every time we file for reimbursement for bills that are the same amount each month, we have to prove that we are not duplicating a previous request. Since our internet services cost the same every month, this becomes burdensome.

252. I like the direct deposit.

253. I was disappointed when I used the web platform. The webinars had not shown screen shots. Forms were hard to locate and repeat information is asked for. I think the website could be made more user friendly and the amount of paperwork could be cut down.

254. Everything is so time consuming and difficult. We are required to stick to strict deadlines, but yet getting our money that was approved can take numerous months without any explanation.

255. I don't understand why we have to submit another form (form 486) after the services have been funded. I think this is not necessary and a waste of time for all parties involved.

256. Electronically deposited payments should have descriptive information about what the payment is for.

257. It was overwhelming. I began the process before but could never finish. As a small rural library, getting a straight answer about what a question meant and what an appropriate answer could be would be amazing. As it is, one must read reams in an attempt to decipher what the question is even asking. I hope that next year will be easier.

> USAC staff are great, but it seems like each year there is another rule or change we need to comply with.

258. I just use consultant to do the filing for us.

259. Should be simplified.

260. I pay a consultant to handle all of the E-rate process because of the expertise needed and time involved.

261. Much improved with electronic transfers

262. Much better now with the direct deposits; invoicing is denying funding that has been approved. It's like a second PIA without the outreach.

263. I strictly use SPI. Even when 486 and SPI is filed timely, vendors are not held accountable to apply the discounts in a timely fashion. Category 2 projects are not bad. I have had issues with all Cat 1 service providers over the last 5 years.

264. We appreciate the financial support!

265. Sometimes a BEAR is approved at $0. What does that mean?

266. It's a pain in the ass, but worth it.

267. PQA and selective review need to understand that no one in the school system is intentionally not following the guidelines and rules. Phone bills are very complicated and procurement is difficult. They need to be more service oriented.

268. There are too many forms and steps

to make it through the process. The constant need to check EPS or email to see where you are is ridiculous. The inability for your help desk to resolve issues directly is more than frustrating. Restoring access to previously submitted forms shouldn't be a year-long process.

269. Reimbursing the applicant makes a lot of sense and makes the BEAR process much easier - but, it should be included in EPC.

270. I like the process being used now; it works well. The only thing I would change is notification to contact person when the payment is transmitted.

271. Form 498 process is awkward and inefficient.

E-rate works! Keep fine tuning EPC and form a user support group.

272. The EPC portal is working but sometimes inaccessible particularly around crunch times. This is understandable but needs to be addressed.

273. E-rate works! Keep fine tuning EPC and form a user support group.

274. The process, whatever it may be, is worth it all. The additional funds really help small school districts whose state funding continues to cut.

275. Electronic payment process is very beneficial.

276. The E-rate process is unnecessarily difficult and not user-friendly at all. The time I spend filing does not make it cost efficient.

277. New Cat 1 BEAR great; Cat 2 can take 6months +

278. Need better description on direct deposit statements

279. The time to receive an FCDL for a consortium application is very slow

280. The report that is issued regarding payments is not relevant. It does not actually tell you what was sent and should no longer be mailed.

281. Has become so slow: you require us to complete multiple forms in a timely manner and once all is completed we have waited over 2 months for reimbursement. I was informed it was for program compliance. Isn't that why we go through the whole process?

282. New management system a bit tough to decipher but it allowed me to save a bit of time by duplicating last year's input to this year

283. It is very confusing.

284. It takes about 3 years to receive our funding.

285. The payment process is fine because that's really worked between USAC and the service providers.

286. Hope the direct payment works better than going through the vendor.

287. If payment is approved for the 471, it should be paid not denied after the fact. An appeal is time consuming and stressful.

288. We have problems with vendors posting SPI credits in a timely manner even when we have approved funding, 486 filed, and all paperwork filed with the vendor. There should be a rule requiring vendors to apply SPI credits to billing in a timely manner. There are E-rate rules that require we pay our percentage share to vendors in a timely manner but nothing that requires vendors to apply our SPI credits in a similar timely manner.

289. I am sure once the tweaks and fixes have been applied, this will be a much easier and more streamlined process. Many schools like our own do not have a person solely dedicated to E-Rate; they have many other responsibilities. Making it easier for applicants will alleviate the stresses of the job and thus cause more effective and efficient job performance. Simply this: simplify the whole process from beginning to end.

290. Really like the form 472 automated in EPC

291. Haven't gotten that far: the Form 471 approval process was so unbelievably horrible this year. Over 10 months!!!

292. I prefer SPI billing. It is the best option for small public school districts with limited funding.

293. I have had constant rejections with no input on why they are rejected. So I keep changing things and trying again. I have to call to get a status. Have filed for 5 years with no rejections. Now everything takes multiple entries. I think(?) I know my mistake but took multiple tries over 4 months and still have only July 16 reimbursed. People on phone are helpful. Auditors are no help and there is nothing in the system to provide input.

294. The payment process is better but the

amount of work to document every single receipt, canceled check etc. is a bit over the top. The following isn't about payment but wanted to make sure someone reads this: They classify some schools in Montana as urban. Really? Have any of those folks been to Montana? I would encourage them to drive here. Everything costs more to get here, we are pretty isolated and all the construction costs of fiber just to get here drives prices up. That is NOT equitable. Population density has GOT to be figured in. We had to go outside of the E-rate program to build our infrastructure and we started the process 6 months before you changed the rules on what qualifies, and now we cannot apply for E-rate because of our only options at the time we built it wasn't eligible and now it is.

295. Quit acting like a bully. We need better trained reviewers and a much better application system.

296. Notification through EPC should be sent to the everyone registered to enter/ certify 471/486s and not just CFO.

297. Extremely confusing for BEAR option certification in 2016.

298. We've had a spin substitution in process for 6 months and SLD is not addressing it, so we can't get reimbursed. We pay for service annually in July, but the SLD won't approve payment until the service has been "used" so we can't get reimbursed until the following June. BEARs may or may not be approved by SLD in a timely manner. It seems random. It has always been squirrelly; the new rules should have made it easier, but the internal hot-mess that is the SLD under EPC seems to have made it worse.

299. The process seems easier now that the payments come directly from USAC rather than the service providers.

300. Since the EPC came online, this process has become very tedious and redundant. It is very fragmented when it comes to requesting guidance on how to prepare and complete USAC requested notices!!!

301. The direct deposit system is one area of improvement that seems to have benefited schools and libraries.

302. Sometimes easy, sometimes very difficult and arbitrary. Invoices are reviewed by a USAC contractor, not staff. No one there will answer questions or return phone calls.

1. We would not be able to handle the process without our consultants.
2. I think the E-rate program works; it allows us to purchase services and equipment we would not otherwise be able to afford. USAC, however, seems to have little or no regard for their customers. When sending us a reimbursement review for instance, they send the request and give us seven days to respond. Then we wait for weeks on end for a response from them without even sending an acknowledgment that they have received the requested documentation. Then they make a decision without requesting additional information if needed. We were denied a reimbursement based on not supplying information that was not requested. When we resubmitted our BEAR form and were reviewed again, the review was approved within a few weeks based on the EXACT information we were denied on previously. Also, 471 approval intervals are absurd. It took us 11 months to be approved for one application and 13 months for another. The program works because of the money we save, but I have dealt with E-rate since it's inception and it is very painful going through the processes and it's gotten worse since EPC.
3. Please go back and start allowing us to apply for E-rate discounts for our voice services and increase the amount you will fund for Wi-Fi on our one school campus!
4. We appreciate the E-rate program, but wish it were less complex.
5. This survey is not accurate as you do not allow for honest answers.
6. My consultant was very helpful with this process. However, I believe the process should be much simpler. I don't understand why it's necessary to bid this out 3 different ways and have a special RFP for it.
7. Please fix the EPC portal. It's just too hard to use.
8. It would be helpful to have stable funding to assist us in keeping up with technology. Again, rural schools do not have the people time to learn another technical program and submit all the needed paperwork on time etc. Please choose the funding to be covered and just fund us! Thank you.
9. I don't know who E-rate uses for advice, but clearly they are not in the field running EPC. You need to find real people who live with E-rate every day.
10. The voice phase-down has had a devastating effect on our technology budget and the $150 per ADA Category 2 budget is in no way close to the actual cost of installing wireless systems.
11. Allow consortium to build their own applicant information and not rely on EPC.
12. Thank you for providing these services which are a great help and benefit to our students and community overall.
13. I have attempted to get funding last year and this year, but have been unsuccessful due to all of the confusing, contradictory, or insufficient information from USAC and all of the municipal roadblocks. We have received POTS funding for 17 years. I was so optimistic about the new E-rate funding, but it seems unattainable.
14. Please bring back telecommunications funding.
15. Make budgets district-wide. We need the flexibility.
16. I have been in my position for 2 years. I have filed for Category 2 funds 2016 and Category 1 funds in 2017. I would like to upgrade our phone services, but funding has been reduced. We are a poor rural system and can't afford to do this without funding that matches current Category 2 funds for district.
17. We would love to have telco refunded.
18. I'm very thankful and appreciative for E-rate. I've always have had someone help me with all the forms and I'm thankful for this also. The way that some things are stated confuss me; E-rate is confusing for me. Especially when the rules and forms change. Thank you.
19. Would love to see the telecommunication services be funded at 100% again!
20. Please bring back discounts for voice services. These provided important support for our annual expenses.
21. We are a 90% discount school district. With the new Category 2 budget cap, it is difficult to maintain the network we have built.
22. I would be amazed if you pay attention to any of my comments.
23. We are grateful for the federal funding provided through the E-rate program. It is essential for our school which serves lower socio-economic students.
24. It would be much more helpful if EPC was user friendly and allowed users to move through it without trying to figure out EPC decided to label areas within the program. The previous system (the USAC website) allowed you to go straight to where you needed to be and move around in the website easily and logically.
25. I would like to see the process simplified further and for items such as the Category 2 budgets to focus more on equity rather than equality. The program is very important to our district and I would love to continue to see improvements.
26. VoIP phone systems are all network based and should not be phased out.
27. USAC has gone downhill and done so fast. Your service and timeliness and reliability have been absolutely awful. It took more than 6 months for you to deny an appeal and you denied it because it was filed 60 days after an FCDL. You could have denied it immediately and had this be automated. You drag out

processes, cost libraries money in decision-making time and made my life incredibly difficult over the past two years. You need to overhaul USAC. EPC is fine and for the most part easier to use, but your back-of-house and customer service is atrocious. People are always super helpful on the phone BUT they can't ever make decisions about pending appeals or cases or ever give you clear information. Sometimes for easy questions the phone call center staff is fantastic. But when it gets complicated you don't allow anyone to make decisions and everything bottlenecks behind the scenes. Enough is enough.

28. Simplify eligibility lists. Return voice funding.

29. Very small schools and districts need to have a much larger Cat 2 budget.

E-rate has allowed us increase in bandwidth in an area where costs are prohibitive.

30. The phaseout of voice service discounts really hurts our library because voice service costs more than internet service in our area.

31. I'm concerned that the Category 1 voice reimbursement is being phased out! We have to have phones at our school!

32. Make the portal user friendly and have all the information available.

33. USAC needs to resolve the unpaid claims for 2015 so that schools and libraries can close out their year.

34. Network neutrality is critical to our continued internet capabilities. Being nickeled-and-dimed by ISPs for using different sites/services would be detrimental to our organization, especially considering that the different services result in negligible cost differences to the ISPs themselves.

35. Please fully fund voice services again. Our organization is struggling to find this without help.

36. USAC should revisit supplying VoIP / voice funding to school districts. Category 2 funding has been good, but the offsetting damage to low voice funding is difficult to stomach.

37. Please provide more funding for voice services.

38. The response time from USAC is terrible both on FCDL and on things such as the Form 500. When I question the CSB, I am just told there is not timeline. Not acceptable. As an applicant, we are

expected to meet deadlines; however, there is no commitment from USAC to do the same.

39. We already had been planning a self provisioned. We cannot apply for funding on something we had a part in. If you are doing budgets why all the paperwork to justify and then have to keep all that around for 10 years?

40. The person that applies for the E-rate knows what she is doing and makes me do what I have to do.

41. DO NOT like the fact that Category 1 funding for phone will be phased out: we still have phone bills to pay and unfortunately we will not get a discount to help pay for them. We don't apply for Category 2 at all. We don't have access to broadband internet as we are in a rural area and it is not offered. If it was offered it would be too expensive. At

this time we get our internet for free from a local telephone company. So this is our last time that we will be filing for E-rate for the foreseeable future.

42. I hope if they redo the EPC portal that they come up with something more user friendly.

43. Phasing out communications, especially VoIP phones, has caused a significant issue for our school district. We have less money to go toward our portion of Cat 2 projects and end-user devices because our VoIP phone bills have increased due to the phase out. We really need funding for VoIP phone service reinstated.

44. It took over 3 months for me to get a response from customer service on an issue. I called 4 times and submitted multiple cases. I was very disappointed by this.

45. We need to have methods for exporting our data.

46. The wait time using EPC for funding commitments was too long!

47. E-rate is vital to our district. The E-rate Modernization Act and online processing is a tremendous benefit, though somewhat cumbersome process to apply and get your money back after you have already been approved.

48. I find the annual trainings very helpful! Thank you for having them.

49. Please go back to the old system.

50. Fund VOICE.

51. The State of Virginia has held workshops to help us with the process which has helped me.

52. Our school loves watching the monthly online webinars, we have at least two people attend each meeting and then share the results and learning. We also write down our questions for the attendees to ask during those webinars it is extremely helpful.

53. I believe there are steps in the right direction. However, the overall process could still use some simplifying, from filing the forms to PIA review.

54. E-rate has allowed us increase our bandwidth exponentially in an area where costs are prohibitive.

55. There needs to be a quicker turnaround time for funding decisions. It isn't very helpful to be awarded money outside of the funding year and then not be able to spend it. Also, form 500 processing took an extremely long time and asked for information that was already provided. It is great when you do receive the money and are able to provide the services necessary to your school. We couldn't have improved our infrastructure without this program!

56. E-rate program is much appreciated by technology folks. We need more education about the program for both superintendents & financial personnel.

57. THE BIGGEST BARRIER TO E-RATE FOR LIBRARIES IS CIPA!!!!

58. One hundred dollars more per child would be sufficient at our district to meet the broadband needs in the classroom. Funding for broadband on buses would help our students continue with their school work when they travel for out of town events or bus ride home. The use of district broadband at home after hours and on weekends would benefit our community due to a major digital divide we have. Our internet resources go unused at night and on weekends and during the summer. Approval to use our broadband resources with our community would be a great step in the right direction.

59. The E-rate process is so confusing, I don't know where I would be without AdTech and ENA!

60. The new EPC system has improved some things and made some things harder to find. Mostly, I like it but it is hard to navigate. The bid process is redundant and does not benefit this district in our very rural area.

61. The time that it takes to secure Cat 2 approval means that work that should be performed in the summer often cannot be completed until late winter.

62. 470, 471 and BEAR forms are too

complicated for a one-person library.

63. E-rate shouldn't be used for self-provisioned networks, the money should be used more for internet access; self-provisioned fiber networks should be considered a capital expense, not E-rate.

64. We rely on the E-rate program and have participated for many years. The changes in 2015 were necessary, but could be revisited. We used up almost all our Priority 2 monies the first year and it still wasn't enough to complete our network upgrade goals so we also spend local funds. I like the focus on Wireless. I like the per student allowance, though accommodations for district core elements should be made. Telecom will not completely go away. Parents use telecom to communicate with schools and it is important. We do appreciate E-rate program.

65. What is self-provisioned network per your definition? If it is internal network, my responses are wrong. If it is about internet access / running fiber to a main ISP hub, my answers are correct.

66. This whole process is just too complicated and time consuming for what we get out of it plus the cost of filtering which is just not worth the headaches!

67. Thanks for E-rate funding. It is a great help to our library patrons.

68. Improving the time frame for FCDLs is essential.

69. I just think there is a really big problem when you have about a 45 page document to fill out an 8 page form!?! That is way too complicated! No one has time for that, especially in IT.

70. The EPC portal navigating is difficult. PIA reviews take long and many times have to be down twice with different PIA reviewer.

71. Changing USAC requirements that apply to already established contracts instead of new contracts, results in potentially unfair competition since the incumbent information is already public. However, they also must resubmit to remain competitive. (Example: Fiber changes between the 14-15 and 15-16 funding years, then FCC/USAC decision reversed to not require the rebidding)

72. The approval process is ridiculous! It delays nearly the entire year. Ours was not approved until February! The fact that they can come back and deny in the second year for something VERY minor is very disconcerting. We are not trying to steal funding but USAC is doing EVERYTHING possible to thwart our efforts to get the equipment into our schools. It has been a very frustrating

process when it should not be.

73. Trying to figure out what kind of budget is left per school is WAY too complicated.

74. Server maintenance should be included. Small schools simply do not have the funds to hire certified technicians to keep servers adequate for student/district needs.

75. The program has become and is becoming more bureaucratic and less useful as it has aged. USF & USAC should be discontinued at the federal level. The investments, fees and surcharges for infrastructure, whether for schools or general public, should be made at the state and district level.

76. We had to make numerous contacts with SLD via phone, appeal, CS cases, etc., to get an error that they made in compiling the data for one of our FRNs. It took 7 months to get this straightened out. That is too long. The SLD staff seemed to be resisting the idea that they could make a mistake and it had to be the applicant's error. This attitude could use a change.

77. Over half of E-rate applicants use a consultant, but the demand for E-rate funding is decreasing. This would seem to indicate that the application process needs to be greatly simplified from the current exhausting multi-step process that stretches on for 18 months before any funding is received by the applicants. This change needs to begin by redefining eligible applicants to include only schools and public libraries associated with villages, counties, and states (no special-type entities). In addition, the SPI method of reimbursement needs to be eliminated. The application process itself needs to be condensed to one simple form to be completed by the applicant that simply states that they are a school or library and what their population/number of students served is. The amount of funds allocated to the support of these services could then be divided amongst the applicants based upon the number of people served.

78. Our major costs continue to be for voice landlines. The elimination of reimbursement for voice services is a major blow to our budget.

79. I am learning the system in a year or two, I am sure all my answers will change. This is one of a dozen things I am responsible for.

80. I know everyone has been trying to throw the EPC system under the bus, but it is better than what we had before. I believe with a few small improvements it can be better. I certainly don't

understand why it has cost so much money to create the system, but I wouldn't junk it and try to start over.

81. I feel the USAC needs to be better prepared for the filing windows and have more knowledgeable staff to assist customers. It takes weeks or even months to receive a response on a case created.

82. USAC telephone customer support is excellent.

83. We have been hurt by the removal of funding for telephone service. We cannot have internet in our building without phone service. If your goal is to provide good reliable internet to all schools and libraries, then you have made a terrible choice in stopping funding. This explains the drop in users of E-rate. People will reach a tipping point where the time and difficulty of the process outweigh the monies reimbursed for services as those services are deleted. Please bring back funding for phone service!

84. Even though you have provided funds for WAN and internet services, we have been cut to the bone and voice service are straining our general funds.

85. Capping Category 2 really hurt us this year.

86. There has been great improvement with the utilization of the EPC. However, I would like more training. I do submit questions but am still unsure after I receive a response. Perhaps the integration of screenshots would be helpful as we are not familiar with all the components of the EPC at this time.

87. Some of the review delays are hard on districts!

88. If you would, please explain in unambiguous terms the definition of "technology neutral" to officials with the State Corporation Commission". They are threatening to deny our state funding of any proposal that uses the word "fiber" on any E-rate RFP.

89. EPC is better but will take a little time to make the adjustment.

90. After the first few years of trying to muddle through this, I hired a consultant to do it all and never looked back. This is way too hard, especially now when it doesn't cover phone lines. It is hardly worthy the effort now. I pay a consultant $150/yr to get $300 or so back? Crazy waste of time for me, the only full time staff person at my small library.

91. Our cooperative files for us.

92. Please simplify the 470/471 applications.

93. We've been waiting for a response from USAC about FY2016's Category 2 funding since September 2016. This

delay is seriously complicating our plan to improve student access to services.

94. We have come to rely on our library cooperative to apply for all members of our wide area network. Without their assistance, applying for E-rate would not be cost/benefit effective due to the time involved in processing the application and the return.

95. Keep funding for all Category 1 services.

96. This is my last E-rate year, I am retiring. If I were going to be here longer, the self-provisioned connection between schools would be of more interest to me.

97. Not sure if I totally understand what was being asked about regarding a self-provisioned network. We own our fiber and all technologies in our network. Nothing is leased.

98. The only reason I didn't find the entire 2017 EPC process more difficult than in 2016 is that I had already gone through the VERY frustrating learning experience. Having kept good notes helped me. My understanding is that this is a purchased product or service and you, (WE), are stuck with it for another year or two, (or more?).

99. Our portion of E-rate is being phased our after FY17. We won't be applying for any E-rate funding after that.

100. The E-rate program is very valuable for our community. Our public computers are heavily used for internet access by individuals who can't afford or don't have access to the bandwidth capacity or technology that we make available.

101. Budget should be by district, not by school site. It's too complicated.

102. Simplify EPC navigation.

103. This survey reflects the problem with the process. You ask about schools and libraries but we are a consortium of libraries. I couldn't answer some of these questions adequately.

104. The lack of accurate guidance and a failure of adhering to previously provided guidance has resulted in extreme frustration and delays. If our project had been accurately and appropriately identified as cost effective, as it was, and was funded we would have saved the USF several hundred thousand dollars already. Due to delays and changes in policies we are incurring additional costs to keep the project alive and moving forward but we still have no decision on our project.

105. All rules and regulations should be set when the ESL has been approved.

106. I do feel filing forms has gotten somewhat easier and quicker, even though there have been issues, it is getting better. Communication and receipt verification of forms is faster.

When I have had to call for assistance, the people I've talked to have been extremely helpful!

107. Cat 2 funding can be improved by changing amounts to district-wide instead of per campus. Over the long term, per campus creates a surplus for some campuses and deficits for others when the goal is to outfit all campuses equally.

108. There are too many known issues not fixed efficiently in the EPC portal. I responded to PIA and can not see or print my documentation. I have had to start forms over because of getting an error message when I did nothing incorrectly. EPC is an epic failure at this time.

109. Faster approval of the 471s would be nice so we would know if we can proceed with our Category 2 projects.

110. Applying last year was a nightmare. This year was an epic fail with not being able to apply at all.

111. USACs stakeholder engagement is not successful. Outreach to the state E-rate coordinators alone is not a communications mechanism that is viable. USAC has plenty of room for improvement.

112. CSB still has inexperienced front line agents giving incorrect information. We used to make multiple calls and try for 2 out of 3, or 3 out of 5 responses that agreed. No matter what the agent response, if it is wrong you still get a COMAD. I frequently ask agents to put their response into the tickets to document their answer. If you don't ask (and they still don't always do it), the ticket only contains your question (in some form, not always correct).

113. I feel that creating the EPC portal has just complicated the application process. I guess I am stupid but I don't understand what was wrong with the forms we filled out online before.

114. Anything that is required by law should be funded, as should anything that is essential to keep networks up and running smoothly. This should include security measures such as robust backup solutions to defend against ransomware attacks.

115. E-rate program is cumbersome and

does not help small libraries that do not have adequate staffing to follow a regimented, time-sensitive process.

116. Very thankful for the E-rate program; despise the EPC

117. I will be doing more investigating about the program but I was told it was a pay first then WAIT for reimbursement. That would not work for our very small budget.

> *...Pay first then wait for reimbursement would not work for our very small budget.*

118. I just want to emphasize that I was unable to answer many of these questions accurately because we contract with a consultant to provide all our E-rate needs.

119. Our school district used the savings USAC provided on our phone bills to acquire technology for our district. This was a much simpler process as we had the power to decide what we needed and where we needed it. Much, much simpler process than the one that exists today.

120. It takes way to long to get a funding commitment letter!

121. I found attempting to work with a meeting planner to be very frustrating. Her failure to do what she says when she says cost my organization a few hundred dollars. I will never attend another training due to her.

122. Please maintain funding of secondary internet. A school district can absolutely not afford to be down during the school day from a service interruption from one vendor. We have had multiple outages this year on our state internet and these outages would have cost us instruction days as well as mandated state testing days.

123. The EPC has not been an improvement over the previous system. In fact, it has made the process harder and even more time consuming.

124. I don't envy the position USAC is currently in, but the implementation of EPC has not been handled correctly. The data structure from day one has made filing applications unnecessarily difficult for big applicants, especially state consortia. More control should be given back to consortiums to manage their users' and members' data. This change alone would go a long way to making the process more efficient.

125. Very disappointed with the process: I have been doing this since the program's inception, and it just keeps getting worse in terms of bureaucracy and user-friendly applications. Let the states administrate this; they did a much better job with this!

126. Please revisit past FCC decisions that denied funding due to service provider failure to certify BEAR form requests.

127. Simplify the application and review process. There is way too much overhead in the system; give the dollars directly to the state to fund its education support priorities.

128. The E-rate program is critical to our schools and libraries for internet access affordability. The EPC needs to be improved in terms of functionality and navigation. Testing with actual applicants would be helpful. EPC also needs a module that works for consortia applications.

129. You should have links to specific areas of the forms on the left so that you don't have to revisit each page. I felt as though every day the process for fiber evolved; that is not a good thing when you are trying to wrap up and submit applications. The process is way too cumbersome. If you choose the best price from the most reliable provider and can show cause then why is there a hassle? A review for fiber in 2017 went from August through the end of

UP should ALWAYS appear to confirm, cancel, or discard form. When going back on any form you should not have to re-answer questions that you have already answered. When reviewing a form you should not have acres of white space between sections or FRNs. When reviewing with your technology team, budget team, admin team, it takes way too long and if you email the draft before a meeting that makes the PDF WAY TOO MANY pages. When you email management at USAC you do not always get a response so you do not know if the issue is being worked on. Changing EPC authority to a new person takes longer that it should. The CSB cases are not always thoroughly/correctly input when you call CSB and when you get a reply that says the case was modified as the end user/question asker the narrative is not normally there with the resolution. Bring Ombudsmen back. Make training 1/2 longer for Q&A's especially when there is a new initiative rolling out; (i.e. fiber). When developing new procedures, have stakeholders on the committees, let constituents know the names and faces so other stakeholders can provide useful constructive ideas during planning, development, testing and deployment.

130. We are in a very rural area with only one provider who does not seem to think rural areas will use many services.

135. Thank God for the new president and FCC chairman. The previous administration was worthless. Mr. Trump, you have our support!

136. Could not go back to fill in unanswered or unsure survey questions

137. PIA people I have worked with often treat me as if I am trying to cheat. They should be more supportive and professional.

138. Review process is horrible. Reviewers are now looking for opportunities to deny discounts rather than assisting applicants. More funds should be allocated to applicant training and less on auditing trivial items.

139. I used to apply for E-rate with confidence that my applications would be funded. Now I apply for E-rate with fear that my applications will not be funded. I feel that common sense has vacated the program. Cat 2 funds should be distributed by district and not by school. Why does the FCC think it knows how money in schools should be distributed? Shouldn't the school personnel be able to determine that? In our district, we have schools that are between 5-70 years old. Does the FCC think that the same amount of money is needed to upgrade the networks? Obviously, that's ridiculous.

140. This year was an absolute fiasco for us with the changes made at your end. Too many contacts at the other end who were not up to speed on the changes. Too many weirdnesses like passwords sent out with a space included at the end (really!) so when I got it I still couldn't log in. Forced to change my BEN and then deal with having to include info from previous filings under the old BEN because the system wasn't setup to pull the old info. I agree with the direction you're heading but this was an ill prepared update.

141. EPC/PIA process does not allow for communication between reviewer and applicant. Canned questions without clarification/discussion leads to uncertainty for applicant.

142. The process is getting easier, but I feel it needs improvement.

143. We could not have grown the district these last 18 years without E-rate funds.

144. Much confusion on service substitutions and form 500

145. I would like to see an online tool for tracking the status of each fiscal year; if I dropped off the planet, I want somebody else to be able to log in, tell where we are for each year, and pick up where I left off. The guide map is cute and useful, although I would prefer a calendar format.

EPC/PIA does not allow for communication between reviewer and applicant.

the year and after spending countless hours answering questions that took the application down to pennies and still denied. Really, 5 1/2 months. The same thing with a PQA: should the process really take over a year to complete to review and site visit? Answering PIA and not being able to see the response to save for future use. Really? PIA going through more that two reviewers, not cool. Using the bulk upload tool for Cat 2 and the process taking multiple hours over several days. Really, the bulk upload is supposed to speed up the process. Why can't an extensive list of equipment be attached to the form like a contract instead of taking forever to add in a form that cumbersome online? The cancel or discard form link SHOULD NOT be next the Back button and a POP

Quite a few people in our area have been told they cannot have internet because there are not enough slots. Our internet service degrades at 5pm so it is like using dial up.

131. USAC seems power mad and unwilling to consider that some state organizations could do better than USAC at administering E-rate funds within their respective states.

132. E-rate should not be so complicated to figure out.

133. DID NOT FILE FOR 2017-2018 AS PAPERWORK TOO DIFFICULT; REIMBURSEMENT FUNDS WENT DOWN.

134. If we are required to have strict deadlines, so should those whom we submit to. We should receive answers quickly in a decent time frame, not months and months after the due date.

146. Our service provider people were very good.

147. This whole process has been cumbersome and unwieldy since the beginning. It seems that USAC is more concerned with possible fraud than actually helping schools and libraries.

148. Still waiting on 2016; needs to be quicker.

149. Please make this process more user friendly for those that apply. As it is, the process is the most stressful application I deal with during the year.

150. Eliminate EPC and all the paperwork and block grant funds to districts based upon enrollment and percent of free and reduced lunch. Trust districts to follow good procurement processes and audit to ensure integrity of funds.

151. I left several responses blank as I'm answering as a Consortium Lead for 50 districts and 4 ESAs.

152. Please just keep in mind we have other work. Only large districts can afford to have dedicated personnel. I often wonder if the cost benefit ratio is truly positive considering how many people it takes to handle this system.

153. Our cities should NOT be classified as urban, none. Please drive here to tell me they should be. We should be able to apply for funding of already built self-provisioned WAN that did not, could not go through E-rate process. The E-rate program was too late to change (not our fault) and too far behind our vision for us to leverage that. That is not equitable!

154. Some of the biggest challenges I've had this year were receiving clear direction from the phone support team. I needed to call multiple times and take all the responses together and go with the one received most. For as long as we've been in this program, our questions aren't FAQs. We are moving our central office, school programs, consolidating programs, closing buildings, etc.

155. We are lawyers, geeks or E-rate specialists. Use language we can understand. Have librarians or educators test beta sites and make suggestions. Upload the contracts as part of the FRN process; it shouldn't be necessary to navigate to another part of the site. Have simple tabs at the top. Log-in. File a form 470. File a form 471. File a form 486.

156. The primary goal of the SLD seems to be to keep their money safe, rather than help schools and library provide service. So, their entire bureaucracy is focused on protecting them from evil schools and libraries trying to steal from them. And they make it excessively hard for rural, small, and

poor communities to benefit because of that.

157. I would really like to see a district wide Category 2 budget. This would really help with the school districts goals. I would also like to see more competition with Category 1 projects. We have vendors that take advantage of the fact that E-rate is paying the majority of the bill so they mark prices way up.

158. E-rate is a great program but, for whatever reason, it seems that those who could benefit most from the program are not applying. There needs to be a review/modification to determine what can be done to make sure those schools and libraries who need it most are not deterred from applying.

159. Overall, I would like for USAC employees to be more qualified & trained to answer our questions when we call in!!!

160. I have asked before: why don't PIA and other evaluators return telephone calls when messages to return a call are left? Many problems could be avoided with a simple, polite telephone response. Stop hiding behind the cloak of the EPC and email.

161. The biggest issue with the process is the completely fluid nature of the rules and processes, specifically regarding fiber rules. Guidance during the fall applicant training was obsolete by December which was changed again in January, February, and March. USAC/FCC need to set the rules before the 470 process and lock them for the funding year. Fear and doubt are the biggest problems with the program.

162. We would like to see the PIA reviewers have access to EPC; would also like to upload all document to EPC , RFP responses, bid analysis, etc. The rPIA reviewer (if properly trained) could access these and not waste our time. This is similar to NIH grants.

163. The separation of Category 2 to the schools for funding helps me organize and prioritize my projects. Using district level Category 2 would hamper my efforts to prioritize and get projects completed.

164. Make the E-rate process easier, less time consuming and improve the connection between process steps as well as communication procedures.

165. EPC has got to go. It has been the bane of the programs existence.

166. There needs to be more flexibility in how the dark fiber one-time expenses are eligible for funding.

167. We have managed to secure state match dollars for fiber build out but we still find that applicants are not taking it up as they are uncomfortable paying

upfront and claiming later.

168. I doubt our school district would be able to navigate the processes and rules of the program, and coincidentally funding support would be significantly reduced without the assistance of a consultant. The program has become so needlessly complex that our participation would suffer, too.

169. The EPC portal seemed to make the process somewhat quicker but it's hard to find what you're looking for and easy to get lost.

170. The biggest problem with EPC is the increase in the amount of information required to complete the funding requests. This is because one of the orders goals was to make the process more cost effective and transparent. The goal of ease of application process is in direct conflict with the goal of transparency and cost effectiveness. As stewards of tax funds (yep it's a tax no matter what you call it) we should prioritize cost effective expenditures over our ease of use every time. Cost effectiveness will suffer as long as the FCC allows districts to purchase from single award state master contracts without leveraging local competition, especially for data and internet circuits. It is a travesty what goes on in Mississippi simply because the FCC allows it. A simple solution would be to have districts show that the SMC is the best option by having a mini bid process. Local access differs widely in our state but the significant increase in competition that such a simple rule could create would push pricing down for everyone. It is just stupid to allow this to continue the way it is, letting districts purchase from the SINGLE AWARD SMC without any LOCAL competitive process. In the case of data circuits STATE WIDE, there is no economy of scale.

171. Fix the system and publish guidance on website not in newsletters or private calls.