

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)	
)	
Modernizing the E-Rate Program for)	WC Docket No. 13-184
Schools and Libraries)	
)	
)	

**COMMENTS OF
USTELECOM – THE BROADBAND ASSOCIATION**

USTelecom – The Broadband Association¹ respectfully submits these comments in response to the Wireline Competition Bureau’s (Bureau) Public Notice² (PN) requesting comment on the Universal Service Administrative Company’s (USAC) drop-down menu options for the FCC Form 470. More specifically, the Bureau seeks comment on whether and how these drop-down menu choices may be improved to minimize the potential for applicant confusion, address concerns about the current FCC Form 470 drop-down menu options,³ and, to the extent practicable, to reduce administrative burdens on applicants and service providers.

USTelecom applauds the Bureau and the Federal Communications Commission (Commission) for seeking comment on this important process issue. Forms such as the FCC Form 470 are designed to ensure compliance with certain E-Rate competitive bidding rules and inject transparency and accountability in the E-rate competitive bidding process. Therefore, it is

¹USTelecom is the nation’s leading trade association representing service providers and suppliers for the broadband innovation industry. Its diverse member base ranges from large publicly traded communications corporations to small companies and cooperatives – all providing advanced communications and broadband services to hundreds of millions of customers around the world.

² Public Notice, “Wireline Competition Bureau and Office of the Managing Director Seek Comment on Improving FCC Form 470 Drop-Down Menu,” WC Docket No. 13-184, DA 19-986 (Oct. 1, 2019) (PN).

³ *See, e.g.*, Letter from Kris Anne Monteith, Chief, Wireline Competition Bureau and Mark Stephens, Managing Director, Office of the Managing Director, FCC, to Radha Sekar, Chief Executive Officer, USAC, DA 18-444 (May 1, 2018).

important to allow stakeholder input into the process used to make applicant information available to potential bidders so that there is no confusion for applicants and bidders.

USTelecom members support any and all efforts to ensure that processes facilitate ease of compliance with the rules and are intuitive and easy to understand.

In an effort to support this initiative, USTelecom members have designed a proposal to improve the drop down menu, making it easier to use, adding transparency and making more effective for all participants in the process.

USTelecom members suggest that USAC include a tool in the drop down menu for applicants to indicate the exact eligible entity or entities and location(s) where the services requested in the FCC Form 470 would need to be delivered, with clarification to exclude entities that just use the service from that host location. While applicants must include exact locations of all affiliated eligible entities in their E-rate Productivity Center (EPC) profile, they are not required to include such detail in their FCC Form 470. Currently, if applicants choose to include location-specific information in their Form 470 documentation their only recourse is to do so in an RFP where used and/or the narrative field. Where applicants do not include location-specific details, would-be bidders have to track down exact addresses with applicants before they can submit a bid. This process is costly and time consuming (especially considering that the E-rate bidding timeframes are often limited to the required 28-day open bidding window) and can become a real barrier for some service providers to participate in the bidding process.

As noted, location-specific information is already submitted by applicants and is captured by USAC in EPC. If USAC were to empower applicants to use that location data to identify where services requested will be needed, it will not only reduce the amount time that applicants and/or their consultants spend in submitting information into the narrative field, but also will

make it easier for a bidder to evaluate RFPs and determine whether they want to submit a bid. Specifically, USTelecom proposes the Commission direct USAC to alter the current process to add a drop down list that would display and allow the selection of the entities and the physical addresses from the USAC EPC database in order to indicate where they would like services to be installed and/or delivered based on the quantity selected. Currently, USAC requires applicants to obtain an Entity Number⁴ and establish a relationship hierarchy known as Parent/Child BEN relationship and the information includes the physical address of each entity – not necessarily the location where service is needed. (See example in Illustration A in Appendix.) USTelecom proposes that this information already documented by the applicants be leveraged in the Form 470 drop down menu.

Specifically, USAC should add a location drop down tab to assist with access to that previously stored location data. (See the mock example in Illustration B in Appendix). For purposes of demonstrating how our proposal would fit into the flow charts provided by the Bureau as part of the instant PN, USTelecom has also included Illustrations C&D in Appendix that show how our proposal would modify Step 4 on the Bureau’s APPENDIX C, Category One Flow Chart and Step 3 on APPENDIX D, Category Two Flow Chart.

In conjunction with this measure, USTelecom proposes that USAC augment the Download 470 Information tools so that it displays the selected entities and locations selected by the applicant/consultants for each FCC Form 470. Mock examples are included in Appendix, Illustration E. These examples show the suggested output for the state of Arkansas including an additional tab of “Location” to the current output file. This sample is illustrative only.

⁴ <https://www.usac.org/sl/applicants/beforeyoubegin/entity-number.aspx>

⁵ <https://data.usac.org/publicreports/Forms/Form470Detail/Index>

The changes proposed herein are necessary in order to ensure full transparency of where services requested will need to be delivered. Additionally, it will save time for applicants, and consultants as well as service providers that would otherwise have to engage in follow up emails and/or phone calls to obtain all of the needed information to evaluate a potential bid. The benefits of this additional transparency and lower operational costs will result in more bid responses to E-Rate requests for provision of services. An increase in bid responses will ultimately create a more pro-competitive environment which will contribute to the financial stability of the program.

USTelecom supports streamlining all processes that will support the Commission's effort to expand the promise of the E-Rate program. USTelecom urges the Bureau to adopt its recommended improvements as part of the FCC Form 470 drop down list so that the Commission's broader policy goal of facilitating compliance with the Commission's E-Rate rules can best be achieved.

Respectfully submitted,

USTELECOM



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