

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

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

COMMENTS OF CENTURYLINK

CenturyLink appreciates the opportunity to comment on the E-rate FCC Form 470 “drop down” menu. The Public Notice¹ invites suggestions on how to improve the drop-down system to reduce confusion by applicants, address acknowledged concerns about the menu options,² and reduce administrative burdens on applicants and service providers.

The E-rate program is very complex, and many applicants – and applicants’ consultants – have difficulty navigating its processes. CenturyLink supports the Commission’s and the Bureau’s efforts to address concerns about processes in the E-rate program that can be difficult and confusing for applicants. Even modest incremental improvements in process can make a meaningful difference to applicants and service providers. It is appropriate, and important, to secure input from stakeholders that interact with the program.

¹ 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 (rel. Oct. 1, 2019).

² See, e.g., Letter from Kris Monteith, Chief, Wireline Competition Bureau and Mark Stephens, Managing Director, Office of the Managing Director, FCC, to Radha Sekar, Chief Executive Officer, Universal Service Administrative Co., DA 18-444 (May 1, 2018).

CenturyLink agrees that the Commission should strive to make the Form 470 drop down process intuitive and easy to understand, technology neutral and adaptable, and searchable, as well as facilitating program compliance. CenturyLink offers two suggestions to make the drop down menu clearer and the applicants' procurement requests easier to understand, and which meet these criteria. The first is to have applicants specify whether they are seeking Internet access or WAN connectivity. The second is to remove the requirement of specifying circuit quantity for circuit-based services on the Form 470, which increases errors and could lock out some service providers from bidding cost effective services.

Specifying Internet Access vs. WAN Connectivity

CenturyLink recommends that the drop down menu add an initial step where the applicant selects "Internet access service" or "WAN connectivity." Currently, many applicants and applicant consultants confuse the two, leaving service providers having to guess the customers' requirements, which may lead some providers to decline to bid or to propose solutions less suited to or cost effective for the customer's actual needs.

The menu screen should include a clear definition of the two services. Definitions are set out on USAC's website glossary for the Eligible Services List. Internet access includes (1) the transmission of information as common carriage; (2) the transmission of information as part of a gateway to an information service, when that transmission does not involve the generation or alteration of the content of information, but may include data transmission, address translation, protocol conversion, billing management, introductory information content, and navigational systems that enable users to access information services, and that do not affect the presentation of such information to users; and (3) electronic mail services (e-mail). Wide area network is a network that provides connections from within an eligible school or library to other locations

beyond the school or library.³ Where an applicant seeks both services, it should repeat the menu process for each service separately.⁴

This suggested update to the drop down menu would enable service providers to better understand what services an applicant is seeking. The recommended change is illustrated in the Attachment.

Removing Quantity for Circuit-based Services

Second, consistent with providing greater transparency in the Form 470 process, CenturyLink suggests it would be wiser not to require applicants to specify quantities for circuit based services on the Form 470. A Form 470 should provide a broad level view, allowing the individual service provider opportunity to respond with a more detailed and most cost effective solution. Quantities specified by applicants on Form 470 are often mistaken, requiring refiling.

This requirement in the Form 470 drop down menu also may limit a service provider's ability to bid using a different circuit quantity. Specific quantities are not required for applicants seeking dark fiber, and it makes far less sense to require applicants to specify on Form 470 quantities for circuit-based services. By removing this unnecessary requirement from the process, providers could propose more cost effective service options using a different circuit quantity, reducing costs for the program and potentially increasing competitive options for applicants.

³ <https://www.usac.org/res/documents/sl/pdf/ESL-Glossary.pdf>.

⁴ Note that Internet access and WAN service are distinct from transport, and they are not necessarily bundled together with transport. Selecting Internet access or WAN (or both) in the Form 470 drop down menu will make it clearer whether and how the applicant is seeking transport.

CenturyLink encourages the Commission and the Bureau to continue pursuing opportunities to improve and streamline processes to make the E-rate program more efficient for applicants and providers and more effective in its mission to promote digital education across the nation. CenturyLink provides these recommendations as just two ways the Form 470 drop down menu process should be improved.

Respectfully submitted,

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