



March 20, 2018

VIA ELECTRONIC FILING

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

Re: State E-Rate Coordinators Alliance March 19, 2018 *Ex Parte* Submission in Response to Notification of Ex Parte Presentation by the Ohio Information Technology Centers dated March 16, 2018

WC Docket No. 13-184
CC Docket No. 02-6

Dear Secretary Dortch:

CSM Consulting, Inc. ("CSM") submits this letter in support of the letter filed on March 19, 2018 by the State E-Rate Coordinators Alliance ("SECA"). SECA's letter was in response to the March 16, 2018 notice of Ex Parte filed by the Ohio Information Technology Centers ("OITC") regarding its presentation to the Commission on March 14, 2018 concerning the August 22, 2018 changes announced by USAC for the manner in which E-Rate applicants are required to select certain Form 470 drop-down menu options in order to be meet E-rate competitive bidding requirements.

The OITC presentation correctly points out the extent of the confusing nature of the changed guidance and provides persuasive references that call into question whether USAC's announced changes are consistent with the 2018 Eligible Services List and within their sphere of authority that is confined to administrative and not policy related guidance. CSM genuinely appreciates the time, effort and high-profile attention the OITC's presentation has focused on the issue at hand and agrees wholeheartedly with each concern and potential solution(s) the OITC presented to the Commission, except for one.

CSM does NOT agree with OITC's suggestion that part of the solution should involve an extension of the Funding Year 2018 Form 471 filing window.

CSM strongly supports the following statements submitted by SECA in their Ex Parte filing:

“An extension will perpetuate rather than solve the problem and will undoubtedly delay the issuance of funding commitment decisions letters.”

“Instead of extending the Form 471 window, we believe that the best solution is for the FCC to instruct the E-rate administrator to not issue any funding denials where applicants attempted to comply in good faith with the Form 470 posting requirements for Internet service.”

CSM further supports SECA’s suggestion that the Form 470 drop-down menu option guidance be revisited and **resolved to be more applicant and service provider friendly prior to the availability of the Funding Year 2019 Form 470.** *(emphasis added)*

We appreciate the Commission’s time, attention, and support for E-Rate participants continued successful funding experiences as the program remains vital in ensuring our nation’s schools and libraries can provide high-speed broadband Internet access at an affordable cost.

Respectfully Submitted,

/s/ Kimberly M. Friends

Kimberly M. Friends
Vice-President
E-Rate Compliance Services
CSM Consulting, Inc.
4160 Golden Foothill Pkwy Ste 101
El Dorado Hills, CA 95762
www.csmcentral.com

kfriends@csmcentral.com

909.972.5355

CC: Ryan Palmer (Division Chief, Wireline Competition Bureau)
Elizabeth Drogula (Deputy Division Chief, Wireline Competition Bureau)
Rebecca Jacobs Goldman (Counsel for Ohio ITC)
Gary Rawson (Chair, SECA)
Julie Tritt-Schell (Co-Chair, SECA)