

# ALA American Library Association

March 29, 2018

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re:** American Library Association *Ex Parte* Notice in response to the *Ex Parte* Notice filed on March 16, 2018, by the Ohio Information Technology Centers seeking an E-rate Form 471 filing extension.

- WC Docket No. 13-184 – Modernizing the E-rate Program for Schools and Libraries
- CC Docket No. 02-6 – Schools and Libraries Universal Service Support Mechanism

Dear Secretary Dortch:

In its March 16 *Ex Parte* Notice the Ohio Information Technology Centers (Ohio ITCs) requested an extension of the March 22, 2018, deadline for filing the E-rate Form 471 applications for the 2018 funding year. The Ohio ITCs requested this extension based on confusion applicants were having over the Form 470 drop-down options for Bundled Internet Access Service. We agree that this confusion certainly caused some number of applicants to select the wrong drop-down option.<sup>1</sup> However, rather than opening an extended filing window to address this issue we very much agree with the resolution proposed in the notice filed on March 19, 2018, by the State E-Rate Coordinators Alliance (SECA).<sup>2</sup> In its filing SECA recommended that the FCC instruct USAC not to issue any funding denials based on the Form 470 drop-down option that applicants selected. In other words, the Commission should hold applicants harmless based on whatever option they selected. We think this is the best and most reasonable way to address this issue.

In moving forward we strongly suggest that USAC correct the Form 470 drop down options before the July 1, 2018, start of filing the Form 470 for the 2019 program year. While additional guidance will be helpful, such guidance is not a substitute for correcting the Form 470 itself.

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<sup>1</sup> In a March 23, 2018 filing EducationSuperHighway estimated that 19 percent of Category 1 Form 470s were misfiled because of this drop-down issue. (See

<https://ecfsapi.fcc.gov/file/10323724310523/ESH%20Ex%20Parte%203-23-18.pdf>).

<sup>2</sup> See SECA Notice at: <https://ecfsapi.fcc.gov/file/1031987457367/SECA%20Ex%20Parte%203-19-18.pdf>.

Thank you for listening to our concerns.

Sincerely,

/s/

Marijke Visser  
Associate Director, Public Policy and Senior Policy Advocate  
American Library Association (ALA)

/s/

Ellen Satterwhite  
Policy Fellow, ALA and Vice President, Glen Echo Group

/s/

Alan S. Inouye  
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