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Director of the Oregon Department of Education

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

The Emergency Connectivity Fund for
Educational Connections and Devices to
Address the Homework Gap During the Pandemic

WC Docket No. 21-93

**COMMENTS ON THE EMERGENCY CONNECTIVITY FUND
FOR EDUCATIONAL CONNECTIONS AND DEVICES TO
ADDRESS THE HOMEWORK GAP DURING THE PANDEMIC
(WC Docket 21-93; DA 21-318)**

The Oregon State E-Rate Coordinator submits these comments in response to the Public Notice DA 21-318 seeking comments on implementing regulations for the \$7.171 billion Emergency Connectivity Fund (“ECF”) under the American Rescue Plan Act of 2021 (“Act”).

In the State of Oregon’s view, the most pressing issue facing the Commission will be when to hold the application window and how long that window should be. We believe that a 30 day window is too short of a time for schools and libraries to complete the process and suggest a 45-day filing window instead to allow eligible schools and libraries to apply for funding on eligible equipment and services.

In addition, we recommend the option for a second filing window if the available funds are not spent entirely in the first 45-day filing window. Even with an extended filing period for the first



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round, we believe there will be applicants who miss that opportunity and would welcome a chance at the funds the following year.

Last, we support the applicant decision of which reimbursement method to use. Currently, all E-Rate applicants can choose to use the Service Provider Invoice method (SPI) or the Billed Entity Applicant Reimbursement Form (BEAR). It would be an unfair burden to require all applicants to use one reimbursement method, rather each applicant should have the opportunity to work with their service provider and select which option works best for them.

Conclusions:

The State of Oregon encourages the Commission to adopt a similar approach to the ECF as already established in the E-Rate Program. The E-Rate Program has rules and regulations in place that could be utilized by the ECF in most cases. The submitting of applications, review process and invoicing would be greatly streamlined by using the same procedure as the E-Rate Program. Once the first application window is closed, if there are remaining funds, a second window would benefit those applicants that did not have a chance to apply the first time around due to the return of students to in person learning currently taking place nationwide.

Respectfully submitted by:

Peter D. Tamayo, Chief Information Officer
Oregon Department of Education

Oregon Department of Education

255 Capitol St NE, Salem, OR 97310 | Voice: 503-947-5600 | Fax: 503-378-5156 | www.oregon.gov/ode