

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Establishing Emergency Connectivity Fund to Close the Homework Gap)	WC Docket No. 21-93
)	
Modernizing the E-rate Program for Schools and Libraries)	WC Docket No. 13-184
)	

COMMENTS OF FUNDS FOR LEARNING



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April 5, 2021

INTRODUCTION AND SUMMARY

Funds For Learning (“FFL”)¹ submits these comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Public Notice² seeking comment on the Emergency Connectivity Fund (“ECF”) to address the Homework Gap during the COVID-19 pandemic.

To help connect students, school staff, and library patrons during the pandemic, Congress established a \$7.171 billion ECF as part of the American Rescue Plan Act of 2021³ and directed the Commission to promulgate rules providing for the distribution of funding. Through these comments, we offer recommendations to ensure the most efficient and effective use of this critical support. Our comments are based on our long history working with schools and libraries across the country – of all sizes and types, in both rural and urban areas – and aimed at ensuring the success of schools and libraries and the communities they serve.

To get the most from the program, the following principles should guide the Commission’s implementation of the ECF. First, the ECF should build upon and leverage the success and resources of the E-rate program. Second, the ECF should support a fair and equitable distribution of funding. Third, the ECF should provide flexible solutions to accommodate the different circumstances of schools and libraries. Fourth, assistance to support broadband connectivity should be delivered swiftly with minimal burden on schools and libraries. Finally, the ECF should promote fiscal accountability and safeguard limited public funds through a combination of financial controls and incentives with public access to all data.

With these overarching principles in mind, we urge the Commission to adopt rules for the ECF program consistent with the following proposals:

¹ Funds For Learning, LLC, is a national E-rate-compliance consulting and web services firm. For the past 24 years, FFL has dedicated itself exclusively to the needs of E-rate stakeholders. Our clients include schools, school districts, and libraries from across the country, of all sizes and types and in both rural and urban areas.

² *Wireline Competition Bureau Seeks Comment on Emergency Connectivity Fund for Educational Connections and Devices to Address the Homework Gap During the Pandemic*, Public Notice, WC Docket No. 21-93, DA 21-317 (rel. March 16, 2021) (“Public Notice”).

³ American Rescue Plan Act, 2021, H.R. 1319, 117th Cong., tit. VII, § 7402 (2021) (enacted) (“American Rescue Plan Act”).

1. The Commission should authorize the Universal Service Administrative Company (“USAC”) to administer the ECF using the same resources that currently support the E-rate program. To reduce administrative costs and delay, and to quickly distribute funds to applicants, the Commission should also use the existing E-rate Productivity Center system to request and administer ECF support.
2. ECF support should be available to all schools, libraries, and consortia eligible for support under the E-rate program, including tribal schools and libraries. In addition, states and territories should be permitted to file consortium application on behalf of schools and libraries, including those that may not participate in the E-rate program.
3. The Commission should recognize that schools and libraries are in the best position to determine the needs of their constituents and allow support for any solution deemed necessary to facilitate remote learning, regardless of service, equipment type or location.
4. To avoid unnecessary administrative complexity, the Commission must eliminate the presumption that only those activities occurring on-campus serve an “educational purpose.”
5. In determining what amount of support to consider reasonable, the Commission should avoid establishing an arbitrary, allowable price range for services and equipment. Instead, a modified version of the E-rate program’s Category Two budget system should be used to calculate the reasonable support amount on a per-applicant basis, and reimbursement should be authorized for eligible expenditures up to that amount.
6. To allow schools and libraries to request ECF support, the Commission should direct USAC to open a 45-day filing window, waive competitive bidding rules to the extent necessary, and make other accommodations to quickly distribute ECF support to applicants.

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I. ADMINISTRATION OF THE ECF

In the Public Notice, the Commission proposes to use USAC to administer the ECF, noting that it is well positioned to oversee the ECF given its experience administering the E-rate program.⁴ It also asks what rules should be adopted to distribute funding and how to best measure the Commission's and USAC's performance in administering the fund.⁵

A. Leveraging the Current E-Rate Program Is Efficient and Effective.

The ECF should be administered by USAC using the same resources that currently support the E-rate program. The E-rate program is a vital national resource, providing faster, more cost-effective broadband connections to 90% of schools and libraries.⁶ Leveraging the existing E-rate program infrastructure to administer the ECF will increase its likelihood of success, reduce the administrative burden on applicants, and minimize the ECF's operating expenses.

Schools and libraries are the primary entities helping to bridge the Homework Gap in communities. Because these same institutions are actively involved in the E-rate program, the program is a natural fit to help schools and libraries access the ECF. In Funds For Learning's 2020 E-rate Applicant Survey, 82% of school and library respondents agreed that the E-rate program is the best solution to support Remote Learning.⁷ Schools and libraries trust and rely on the E-rate program; they are familiar with its forms and systems; and they appreciate the recent improvements to its administration.⁸ The

⁴ Public Notice at 3.

⁵ *Id.*

⁶ FFL conducts an annual survey of E-rate applicants. In the spring of 2020, there were 2,138 respondents to the survey, representing 9.9% of all program participants. 95% of respondents describe the E-rate program as vital for Internet access, and 89% state that more students and library patrons are connected to the Internet because of it. See 2020 E-rate Trends Analysis, Funds For Learning Ex Parte Submission, WC Docket No. 13- 184, CC Docket No. 02-6 (filed July 17, 2020), <https://ecfsapi.fcc.gov/file/1071774292501/2020-0717%20Applicant%20Survey%20Results%20WCB%20Ex%20Parte.pdf> ("2020 E-rate Trends Analysis").

⁷ *Id.* at 2.

⁸ *Id.* Notably, only 7% of applicants report being dissatisfied with USAC.

Commission should therefore build upon the success of the E-rate program by implementing an ECF which draws on its resources, infrastructure, and administration.

B. The ECF Should Be Administered Using the Existing E-rate Productivity Center System.

The E-rate Productivity Center (“EPC”), the current E-rate online application portal, should be utilized to request and administer ECF support. EPC is familiar to the many thousands of schools and libraries that use it on a regular basis. Continuing to use a successful and trusted system will allow applicants to request ECF support with relative ease and without having to navigate a new system with new requirements.

Authorizing USAC to administer requests through EPC also conserves important administrative resources. Creating a new application system would pose significant challenges, needlessly delaying support for applicants and reducing the funding available to schools and libraries due to higher administrative costs. It took several years and tens of millions of dollars to develop EPC into a reliable platform.⁹ In 2016, 60% of applicants reported difficulty navigating the EPC system;¹⁰ but, by 2020, only 5% of applicants stated that the EPC system did not meet their needs.¹¹ Further, EPC is preloaded with most of the information needed to process ECF application securely and efficiently. Given the time-sensitive nature of the ECF, and the 2% limit on its administrative costs, schools and libraries would be best served by an ECF that uses a modified version of the current EPC system for the submission of applications and processing of reimbursements.

⁹ Funds For Learning, “USAC Told to Fix Flaws, Focus on Service,” <https://www.fundsforlearning.com/news/2017/04/usac-told-to-fix-flaws-focus-on-service/>.

¹⁰ 2020 E-rate Trends Analysis at 18.

¹¹ *Id* at 40.

C. The ECF's Efficacy Should Be Measured by How It Supports Applicants.

Information about the services and equipment purchased with ECF support will be available using the EPC system. From this readily available data, a great deal of information and reporting will be available to and accessible by the public.¹² Therefore, rather than setting benchmarks for the types of services supported or number of students served, the Commission should instead focus on the following metrics to monitor the efficacy of the ECF:

- The percentage of eligible applicants who receive reimbursements.
- The speed of applicant funding commitments and reimbursements.
- The utilization rate of committed funds.

II. ELIGIBLE SCHOOLS AND LIBRARIES

With respect to the entities eligible for ECF support, the Commission proposes to allow support for all schools, libraries, and consortia that qualify for discounts under the E-rate program.¹³ The Commission also asks whether there are other entities, not eligible under the E-rate program, that it should make eligible for support through the ECF.

We agree that ECF support can and should be determined using the existing E-rate eligibility criteria. Accordingly, all schools, libraries and consortia eligible for E-rate discounts should be eligible for ECF support, including tribal schools and libraries. In addition, we encourage the Commission to allow the Department of Education of each state and U.S. territory to submit a specially designated consortium application on behalf of schools and libraries, including those that may not currently participate in the E-rate program.

¹² For example, using E-rate data in the EPC system, Funds For Learning estimates that the average price per megabit of broadband service for schools and libraries has dropped from \$4.63/Mbps in 2016 to \$0.89/Mbps in 2020. See "E-rate Delivering More (Faster) Connections", Nov. 13, 2020, <https://www.fundsforlearning.com/news/2020/11/e-rate-delivering-more-faster-connections/>.

¹³ Public Notice at 4

III. ELIGIBLE EQUIPMENT, SERVICES AND LOCATIONS

The Commission notes that the American Rescue Plan requires ECF support to be used for the purchase of (i) eligible equipment and/or (ii) advanced telecommunications and information services for use by students, school staff, and library patrons at locations other than schools and libraries.¹⁴ In defining those terms, the Commission proposes to limit funding to “equipment and services that are needed to provide the connectivity required to enable and support remote learning for students, school staff, and library patrons.”¹⁵ The Commission seeks comment on this approach, as well as the specific equipment and services considered necessary to support and facilitate connectivity for remote learning.¹⁶

A. ECF Support Should Be Available for Any Solution Deemed Necessary to Facilitate Remote Learning.

Rather than reverting to an eligible services policy with narrow definitions and strict requirements, ECF support should be available for any hardware, software, and/or service that a school or library deems necessary for remote learning. The objective, where at all possible, should be to provide schools and libraries with maximum choice to select a solution that works best for them. Therefore, in this important regard, we encourage the Commission to adopt an approach that makes eligible all options deemed necessary to support remote learning.

To define a distinct list of eligible equipment or services is to ignore the true nature of the challenges faced by students and library patrons. The needs of schools and libraries are not uniform, and there is no on-size-fits-all solution to address the Homework Gap. Allowing for a variety of solutions increases the chance that a school or library will find a cost-effective solution that best fits their needs. Similarly, minimum standards should not be applied to equipment specifications (e.g., laptop computer

¹⁴ American Rescue Plan Act, tit. VII § 7402; Public Notice at 5.

¹⁵ Public Notice at 5.

¹⁶ *Id.*

processing capabilities). There is significant accountability at the local level for the functionality of equipment, and minimum standards will only add unnecessary administrative complexity. Accordingly, in determining which services and equipment to deem eligible for support, the Commission should keep its rules as broad as possible so as not to limit or unintentionally omit certain technologies and avoid minimum standards for eligible equipment.

B. Eligible Services Must Include Cybersecurity and End-User Resources.

The objective of the ECF is to provide schools and libraries with the resources necessary to enable and support remote learning for students, staff, and library patrons. Applicants should therefore be allowed to invest in any goods and services deemed necessary to enable remote learning. For connectivity, this includes backend network resources, cybersecurity, and Wi-Fi signals extending from school and library campuses. For connected learning devices, this includes hardware and software, virtual devices, headsets, Unified Communications (UC/UCaaS) systems, cybersecurity tools, and other resources necessary to participate in remote learning. Because these resources are necessary to facilitate remote learning, they should be eligible for ECF support.

C. Educational Purposes Can No Longer Be Presumed to Occur Only On-Campus.

For purposes of the ECF, the FCC must eliminate the presumption that only those activities occurring on-campus serve an “educational purpose.”¹⁷ By the very creation of the ECF, Congress acknowledged that educational activities are no longer limited to the campus or physical classroom. This inescapable fact has been in plain sight for many years – long before the COVID-19 pandemic – and to such an extent that even the U.S. Government Accountability Office has urged the FCC to address the need for off-campus connectivity.¹⁸

¹⁷ See 47 C.F.R. § 54.500.

¹⁸ U.S. Gov’t Accountability Office, GAO-19-564, FCC Should Assess Making Off-School Premises Access Eligible for Additional Federal Support 23 (July 2019), <https://www.gao.gov/assets/710/700629.pdf> (“GAO Report”).

Distinguishing the eligibility of goods or services based on their location is nonsensical in the current context. There simply cannot be an on-campus or off-campus paradigm in the ECF. The explicit purpose of the ECF is enable remote learning. Therefore, if it is technically feasible and cost-effective, a school or library should be allowed to extend their Wi-Fi off-campus in order to enable remote learning. To suggest otherwise is to declare on-campus equipment and services ineligible for ECF support. The rationale for this is flawed and would lead to a cascade of administrative complexities. For example, would an ECF-funded school laptop become ineligible for support if it were used “on-campus” at a library? If a Wi-Fi hotspot is carried “on-campus” would the data service plan need to be cost-allocated and reimbursement made only for the data used “off-campus”? What if a student from a different school district is visiting “on-campus” and remote learning to a different school? Would that be considered remote learning because they are remotely attending a school even though they are technically on a school campus?

Using location-based eligibility standards will significantly impede both the intent and efficacy of the ECF. Therefore, the Commission should make clear that there is no corresponding prohibition on the on-campus use of ECF-funded services and equipment.

IV. REASONABLE SUPPORT AMOUNT

In the Public Notice, the Commission observes that the American Rescue Plan directs it to reimburse 100% of the costs associated with eligible equipment and services while noting that such reimbursement may not exceed an amount the Commission determines to be “reasonable.”¹⁹ The Commission also seeks comment on how to determine what amount of support should be considered reasonable.

¹⁹ Public Notice at 10.

A. The E-rate Discount Rate is a Useful Gauge of the Homework Gap in a Community

Insufficient home internet access is a significant issue in 90% of communities.²⁰ Given the widespread nature of the problem, the ECF should provide support for any student, staff, or library patron who lacks broadband access, regardless of the overall degree of economic need in a community. At the same time, support should be prioritized for schools and libraries in communities that need it most. To effectively target those schools and libraries, the E-rate discount rate can be used gauge the approximate level of the Homework Gap in a community.

According to the Government Accountability Office, household income level is the most significant factor in identifying the percentage of school-age children who lack adequate Internet access at home.²¹ The E-rate discount rate is calculated based on the level of economic poverty in a community. Therefore, applicants with a higher E-rate discount rate generally represent communities with a higher level of the Homework Gap. Assessing the relative degree of the Homework Gap using the E-rate discount rate can help direct support to communities that need it most.

This approach will also improve the efficiency and efficacy of the ECF. The E-rate discount rate is an existing piece of information that is readily available and verified as part of the current E-rate application process. Reporting the E-rate discount does not require applicants to conduct new surveys or gather additional information. It is a known quantity and using it will save applicants and USAC precious time and energy in determining where and how much support is reasonable to provide.

B. The E-rate Category Two Budget System Offers a Successful Model

This is not the first time that the FCC has needed to distribute support amongst a broad array of applicants. Nor is this the first time the FCC has taken on the challenge of providing a sliding scale of

²⁰ 2020 E-rate Trends Analysis at 19.

²¹ GAO Report at 1.

support that corresponds to the relative needs of a community and the overall amount of funding available. For this, the Commission need look no further than the structure of its successful E-rate Category Two (“C2”) budget system.

The E-rate C2 budget system works significantly better than the Priority System that it replaced. The Priority System required that applications be processed based on the discount rate of an applicant. All funding requests were funded for the applicants at a particular discount rate. Delays were numerous, and most applicants never received support.

The C2 budget system replaced the Priority System with a new mechanism that guaranteed every applicant access to a certain level of C2 funding tied to their discount rate and the size of their school or library. The results of this new system have been very positive, exceeding the expectations of many in the education community who derided the system as a recipe for disaster. The C2 budget system has brought about measurable improvements to the E-rate program. There has been a 250% increase in the applicants receiving support; a 64% reduction in the processing time for C2 applications; and a 9% increase in the utilization rates of committed funds. More applicants are receiving C2 funding faster and using more of their committed funds.

Comparing E-rate Program Performance Efficacy Using Budget Caps vs. Discount Thresholds

Performance Measure	Discount Threshold (FY06-FY12)	Budget Caps (FY15-FY20)	Impact of C2 Budget Caps
% of Applicants Receiving C2 Funds	14%	35%	250% increase in recipients of C2 funds
Wait for funding decision (weeks)	52	19	64% reduction in wait time
C2 Funding Utilization	81%	89% <small>(FY15-FY18)</small>	9% increase in funding utilization

C. Calculating the Reasonable Budget Amount for Reimbursement (RBAR).

Using a similar mechanism, the ECF’s Reasonable Budget Amount for Reimbursement (RBAR) should be pre-determined using objective criteria to calculate maximum reimbursement amounts quickly

and equitably. Under this approach, each school and library would be allowed to apply for reimbursement up to an amount calculated using the RBAR calculation formula.²² Depending upon the poverty level in a community, we estimate that the RBAR for schools would range from \$31 to \$133 per student. For libraries, the average range would vary from \$0.90 per square foot to \$4.12 per square foot.

An additional benefit of using the E-rate discount rate to calculate the RBAR is its consideration of the rural or urban status of an applicant. Overall, the rural schools will receive an average of 6% more support than their urban counterparts. Rural libraries will receive an average of 17% more than their urban counterparts. The table below summarizes the estimated average RBAR by entity type and location.

Estimated Average Maximum Reimbursement by Rural or Urban Status

Applicant Type	Rural	Urban	Impact for Rural Applicants
School	\$113.90 per student	\$107.34 per student	6% more per student (average)
Library	\$4.06 per Sq. Ft.	\$3.46 per Sq. Ft.	17% more per square foot (average)

D. Establishing Allowable Price Ranges is Arbitrary and Inefficient.

In determining what level of ECF support to consider reasonable, the Commission should avoid setting allowable price ranges for services or equipment. For a problem as multifaceted as the Homework Gap, the decision to set a particular price range will ultimately be arbitrary and could eliminate the only available solution to connect a student or library patron. If the FCC begins to define every aspect of a connected learning device and service (i.e., establishing price points and a catalog of eligible items), it will add undue complexity to the program and exponentially increase the time required to review applications and pay reimbursements.

²² See Exhibit A: Calculating the Reasonable Budget Amount for Reimbursement (RBAR).

Along the same lines, local priorities and decision making should not be held to subjective standards. Funding decision times increase significantly when USAC or the FCC is required to make a judgement call about an individual applicant's purchasing decision. Consider, for example, the Category One special construction charges. From funding year 2016 to 2020, FFL estimates that Category One funding requests which included special construction charges took 255% longer to process than the average Category One funding request. Special construction projects are reviewed and evaluated for cost-effectiveness by USAC on a case-by-case basis. It makes sense that this type of personalized review takes longer to complete. A time-consuming, subjective application review process, however, is not the type of process that yields fast decisions one would expect for an emergency connectivity fund.

V. APPLICATION PROCESS

In the Public Notice, the Commission proposes opening a 30-day window to allow eligible schools and libraries to apply for ECF funding.²³ It seeks comment on this proposal and attendant issues concerning the application process.

A. The Commission Should Adopt a Modified FCC Form 470 and FCC Form 471 Process.

Rather than limiting the ECF filing window to 30 days, the Commission should direct USAC to open a 45-day window to ensure applicants have sufficient time to request funding for eligible services and equipment. The filing window would open on Monday, July 5, 2021 and close on Thursday, August 19, 2021. If the FCC releases its ECF Order by May 16, 2021, this will allow applicants up to 95 days to plan and prepare their applications, and, if necessary, conduct procurement.

To help schools and libraries receive support as soon as possible, the Commission should also adopt a modified FCC Form 470 and FCC Form 471 process to include the following elements:

²³ Public Notice at 12.

- Schools and libraries should be permitted to seek both retroactive reimbursements and support for new expenditures.
- Requests for support should be submitted using a modified version of the EPC system.
- The FCC should make clear that all applicants are required to follow their state/local/tribal competitive bidding requirements.
- For new purchases, applicants should be required to post a Form 470, but all additional FCC bidding requirements should be waived, including the 28-day waiting period.
- The Commission should make clear that a signed contract is not required prior to the Form 471 submission.
- Applicants should submit a Form 471 detailing the goods and services requested.

B. USAC Should Process Applications Using a Two-Track Review Process.

The Commission should adopt a two-track application review process – one for schools and libraries and another for Departments of Education. To accomplish this, the ECF would be divided into two corresponding funds: a “School and Library ECF Fund” and a “State Special Request ECF Fund.” The School and Library ECF fund would be set at \$6,285,000,000, while the State Special Request ECF Fund would be set at \$765,000,000. Uncommitted funds from the School and Library ECF Fund could be added to the State Special Request ECF Fund.

Using this approach, schools and libraries would be allowed to submit one Form 471 application that would be capped at the RBAR amount using the modified C2 budget methodology previously described. These applications would be processed and funded via the “School and Library ECF Fund.” Because of the emergency nature of this fund, it is critical that support is disbursed as quickly as possible. To this end, the Commission should direct USAC to conduct an expedited review of each application, committing funds based primarily on the certifications made by applicants.

In addition, the Department of Education of a state or U.S. territory would be allowed to submit its own Form 471 application. These applications would be processed and funded via the “State Special

Request ECF Fund.” Applications would be prioritized based on predetermined factors, such as availability and cost of broadband services, the number of remote learners without Internet access, and the cost-effectiveness of a project as measured by the amount of funding necessary per remote learner receiving support.

C. Subsequent Filing Windows.

If a significant percentage of funds remain uncommitted after the initial filing window, a subsequent filing window should be announced, using a similar timeline and following a similar reimbursement allocation pattern, albeit with revised RBAR factors.

D. ECF Reimbursements and Invoice Reviews

The Commission should direct USAC to conduct an expedited review of payment paperwork, distributing funds primarily based on certifications made by applicants and/or service providers without significant “pre-disbursement” invoice reviews. While recognizing the importance of efficiently distributing emergency support, it is also important that payments be documented and reviewed. As with the existing E-rate program, USAC should be required to conduct post-disbursement reviews and audits in line with its other practices and experience.

VI. CONCLUSION

FFL appreciates the opportunity to submit these comments. The ECF is an important step to support remote learning during an unprecedented crisis. To get the most out of the ECF, and for all the foregoing reasons, we encourage the Commission to adopt rules consistent with the recommendations herein.

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Respectfully submitted,



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Exhibit A: Reasonable Budget Amount for Reimbursement (RBAR) Methodology

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Using a similar mechanism as the Category 2 system, the Reasonable Budget Amount for Reimbursement (RBAR) can be pre-determined using objective criteria. Each school and library would be allowed to apply for a reimbursement up to their specific RBAR, calculated using the following method:

School RBAR

$$\text{School RBAR} = \text{Student Enrollment} \times E - \text{rate Discount} \times \$157$$

Library RBAR (maximum of the following two equations)

$$\text{Library RBAR} = \text{Square Footage} \times E - \text{rate Discount} \times \$4.50$$

$$\text{Library RBAR} = E - \text{rate Discount} \times \$25,000$$

Using these formulas and the most recent E-rate discount rate information, it is possible to estimate the maximum amount of reimbursement each school and library could request.

