Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	CC Docket No. 02-6
Request for Review of Decision of the	)	
Universal Service Administrator by	)	
	)	File No. FCC Application
KIPP Chicago Schools	)	Number 171034452
	)	
Schools and Libraries Universal Service	)	
Support Mechanism	)	
	)	

To: Federal Communications Commission

KIPP CHICAGO SCHOOLS
REQUEST FOR REVIEW

This Request for Review of the decision of the Universal Service Administrative Company

("USAC") is submitted on behalf of KIPP Chicago Schools ("KIPP")[1] by Funds For Learning, LLC

("FFL")[2] pursuant to Section 54.719(b) of the Federal Communications Commission's rules.[3]

As discussed below, KIPP timely filed an application for E-rate funding. Weeks later, in

anticipation of the summer holiday, it requested that USAC suspend the application review process during

the break. KIPP also learned during this time that the school was planning to expand by adding a grade.

Because its application was in review, KIPP knew it would be necessary to update enrollment numbers

once the review process resumed. Before the scheduled end of the summer deferral period, however,

KIPP received a funding commitment decision from USAC informing it that USAC had denied the

funding request at issue. According to USAC, the funding request was denied because KIPP did not

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[1] Billed Entity Number 16057656.

[2] Consultant Registration Number 16024808.

[3] 47 C.F.R. § 54.719(b) (permitting parties aggrieved by an action taken by the Administrator, after seeking review from the Administrator, to seek review from the Commission).

authorize sufficient modifications to its Category Two budget and purportedly failed to respond to USAC information requests.

KIPP filed an appeal with USAC. It explained that USAC had mistakenly removed the application from summer deferral status and issued the funding commitment decision when the review process should have been suspended. Therefore, as KIPP pointed out in the underlying appeal, it did not have an opportunity to authorize any modifications to its Category Two budget and was not available to respond to USAC information requests. Nor was it able to provide updated student enrollment numbers to reflect the planned expansion. USAC ultimately denied the appeal.

KIPP respectfully requests that the Commission (1) reverse USAC's decision on appeal and (2) direct USAC to issue a revised funding commitment decision based on the enrollment numbers provided. For the reasons set forth below, the Commission should also instruct USAC to reconsider and revise its existing procedures and administration of Category Two funding requests. Current procedures have made the application process overly burdensome and unnecessary funding denials routine. A change in USAC's procedures could improve the application process for schools and libraries, simplify the application review process for USAC, and reduce delays and denials in funding commitments.

I. BACKGROUND

A. Funding Year 2017 Application and Application Review Process

On May 9, 2017, KIPP filed a funding year 2017 FCC Form 471 ("Form 471"), requesting E-rate program support for Category Two products and services.[4] Included on the application was KIPP's funding request ("FRN") for network electronics, totaling $31,060.16.[5]

Several weeks later, when the Form 471 was still in review, KIPP sought to defer any Program Integrity Assurance ("PIA") application review during the summer period. The school was on break for the summer, and KIPP anticipated that its designated E-rate staff might be unavailable to answer questions or provide information. On August 16, 2017, KIPP selected the "Apply Summer or Winter

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[4] FCC Form 471 Application Number 171034452.
[5] FRN 1799076409.

Deferral" option in the E-rate Productivity Center ("EPC"), and according to the notification provided, "the Summer or Winter Deferral [was] applied."

Around this time, KIPP staff learned that the school planned to add a grade prior to start of the new year. Because KIPP's pending Category Two request was based on previously reported student counts, it was aware that it would need to provide new enrollment numbers to USAC while the application was still in review (i.e., once the application was removed from summer deferral status).

However, on August 25, 2017, well before the scheduled end of the summer period, KIPP received a Funding Commitment Decision Letter informing it that USAC had denied KIPP's network electronics funding request entirely. The following explanations were provided in the decision letter:

> DR1: This funding request is being denied because you have not authorized sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget.

> DR2: The FRN is denied because the applicant failed to respond to the Administrator's Information Request.

KIPP contacted USAC, insisting that it had selected the summer deferral option and requesting an explanation for the denial. A USAC representative explained that the application was removed from deferral status because KIPP had designated a summer/holiday contact on the Form 471. And according to the representative, the funding request was denied because KIPP failed to respond to a subsequent information request within the allowable period. KIPP was never notified that the application was removed from deferral status; nor was it aware that USAC had requested additional information.

B. Letter of Appeal and USAC Information Request

KIPP filed an appeal with USAC on October 17, 2017.[6] It requested that USAC either reverse the funding commitment decision, or rescind the funding commitment and review the application and related documentation before again issuing a decision. To expedite the review process, KIPP provided the information originally requested during the PIA review and included a table itemizing the reductions

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[6] The letter of appeal, along with supporting documentation and exhibits is attached as Exhibit A.

necessary to bring the request within its Category Two budget. It also provided third-party documentation validating the planned grade expansion and the new Category Two budget.

On March 17, 2018, KIPP received an information request from USAC seeking additional information to complete its review of the appeal. Specifically, USAC explained that the Category Two funding requested for one of KIPP's entities exceeded the Category Two budget. It also asked if KIPP wished to reduce the funding request line items to bring the entity within budget.

KIPP timely responded on March 26, 2018.[7] It agreed to reduce the pre-discount eligible cost allocation for the entity and specified the FRN line item number to reduce. KIPP also informed USAC that it anticipated an increase in the student count based on the addition of the new grade, and therefore, the Category Two budget should be increased accordingly. Documentation verifying the updated enrollment was also included in the response.

On April 25, 2018, KIPP received notification that USAC denied the appeal. USAC provided the following explanation for its decision:

> The entity 16079516 Kipp One requested pre-discount funding amount for Category Two Services in excess of its Category Two budget of $28,391.86. During PIA review of FCC Form 471# 171034452, you did not authorize sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget and the amount requested is over the entity's Category Two budget by $37,249.51. Accordingly, your request was denied.

> On appeal you requested to reduce FRN 1799076409 line item 9 from $12,500.00 to $9,627.86 to make an actual reduction of $2,872.14. You also requested to revise the total number of Full Time student count from 185 to 409. The requested revision of the student count is not allowed during the post-commit appeal review since this modification was not requested during PIA review or before the Funding Commitment Decision Letter (FCDL) was issued. On appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.[8]

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[7] KIPP's response to the information request is attached as <u>Exhibit B</u>.
[8] Revised Funding Commitment Decision Letter, denying the appeal, is attached as <u>Exhibit C</u>.

Given the explanation provided, it appears that USAC failed to consider the arguments in the underlying appeal and the information offered. Instead, it simply denied the appeal because student count modifications are generally not permitted after the issuance of the FCDL.

II. DISCUSSION

A. USAC Improperly Removed the Application from Summer Deferral Status.

USAC's failure to suspend the application review process directly conflicts with its own, previously issued guidance. USAC, in its July 14, 2017 News Brief, provided the following instruction to applicants regarding the application review process during the summer period:

> We realize that, during a summer period and a winter period each year, many applicants are unavailable due to extended holiday and break schedules. PIA will put the review of your application on hold if we cannot make a live contact by telephone with the contact person or someone else who has been designated to respond to our questions.
>
> Our summer contact period is defined as the Friday before Memorial Day through the Friday after Labor Day. For 2017, the dates of the summer contact period are May 26 through September 8.
>
> If our first attempt to contact you was on or after May 26, and we cannot confirm that you are available to respond to our questions, we will put your review process on hold and not continue the review of your application until after September 8.[9]
>
> You also have the option of requesting a summer deferral through EPC.

KIPP timely applied for the summer deferral and was notified via EPC that the request was successfully submitted. At no point did USAC contact any authorized KIPP representative. Nor did KIPP receive any written information requests during what should have been the summer period. According to USAC guidance, therefore, USAC should have suspended any PIA review until September 8, 2017 (i.e., the end of the summer contact period).

KIPP also disagrees with USAC's assertion that listing a holiday contact on an application, in effect, overrides an applicant's subsequent request for a summer deferral made in EPC. When KIPP

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[9] *Information Requests from USAC – Summer Contact Period Started May 26*, Schools and Libraries Program News Brief (Universal Service Administrative Company), July 14, 2017, attached as <u>Exhibit D</u>.

inquired why the funding request had been denied, a USAC representative informed it that the application was removed from summer deferral status because KIPP had designated a holiday/summer contact. And because KIPP was required to provide the requested information within 15 days and did not, the funding for the FRN at issue was denied.

Although KIPP designated a summer/holiday on its application at the time of filing, neither USAC nor FCC rules preclude it from requesting that the application be placed on summer deferral once submitted – in this case months later. And as a practical matter, an applicant should be permitted to defer any application review whether or not a holiday contact was listed on the FCC Form 471. Many schools and libraries are unavailable during the summer months, and circumstances may change from the certification date to the time the PIA review is initiated. Such was the case here.

B. KIPP Should Have Been Permitted to Update the Discount Calculation While the Application was in Review.

USAC acknowledges that an applicant's Category Two budget can increase or decrease from one funding year to the next.[10] For example, "the budget could increase from the previous funding year if [a school's] student count increases . . . or it could decrease if the student count decreases."[11] Accordingly, USAC permits applicants to update the discount calculation during the review process: "once the student count is known, applicants may update the discount calculation based on the actual student population during PIA review but must do so prior to the issuance of the Funding Commitment Decision Letter" ("FCDL").

Pursuant to USAC guidance, KIPP *should have* been permitted to update the number of students enrolled for purposes of establishing a Category Two budget during PIA review and up to the issuance of the FCDL. However, KIPP was never afforded the opportunity to provide the actual student count before USAC issued the funding decision. USAC errantly removed the Form 471 at issue from temporary summer deferral status. Because KIPP was unaware that the application was no longer in review, it failed

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[10] Universal Service Administrative Company, *Step 3 Applying for Discounts – Category Two Budget*, USAC.org, https://www.usac.org/sl/applicants/step03/category-two-budget.aspx (last visited June 4, 2018).
[11] *Id.*

to respond to a subsequent information request. USAC then issued the FCDL, denying the funding request entirely.

Unfortunately, it appears USAC compounded its mistake in denying KIPP's appeal. USAC's decision contained the following explanation: "The requested revision of the student count is not allowed during the post-commit [sic] appeal review since this modification was not requested during PIA review or before the Funding Commitment Decision Letter (FCDL) was issued."[12] But in reaching its conclusion, USAC ignored one important fact: it was necessary to revise the student count during the post-commitment appeal review *because* USAC prematurely removed the application from the summer deferral status.

C. The Commission Should Instruct USAC to Issue a Revised Funding Commitment Based on the Actual Number of Students Enrolled.

KIPP ultimately requests that USAC issue a funding commitment in the correct amount, based on an accurate student count. KIPP twice provided the updated student enrollment numbers reflecting the planned expansion – once in its initial appeal and again in response to USAC's subsequent information request. Nevertheless, USAC denied funding completely in both instances.

USAC's error – prematurely removing the application from summer deferral – and apparent procedural limitations – prohibiting the revision of student counts after issuance of the FCDL – have thus far prevented it from issuing a proper funding commitment. KIPP, therefore, requests that the Commission direct USAC to fund the FRN at the correct level, based on the revised, accurate student enrollment numbers.

D. The Commission Should Instruct USAC to Revise Current Category Two Procedures.

Moving forward, the Commission should instruct USAC to reconsider and revise its existing procedures and administration of Category Two funding requests. USAC currently requires applicants to reduce their Category Two requests to an amount equal to or less than the remaining Category Two

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[12] *See supra* Exhibit A.

budget for a site, or be denied their request entirely. This requirement is making the application review process exceedingly difficult and unnecessary denials routine.

The current procedures require an applicant to remove items and/or adjust unit costs to reduce the E-rate eligible cost of a project – a cost the applicant must absorb – so that the funding request(s) equals no more than the remaining budget cap for each school or library site. While nothing in the Commission's rules requires USAC to completely deny Category Two funding requests in the event the request exceeds the allowable Category Two budget, this is precisely how USAC currently administers such requests.

For example, consider the case of Margaret A. Neary Elementary School in Southborough, Massachusetts.[13] Southborough School District submitted a $34,700.00 funding request for a network infrastructure project at a 40% discount rate.[14] USAC denied funding for the project, providing the following explanation:

> Your total requested Category Two pre-discount funding amount for
> BEN 895 exceeds this entity's Category Two budget by: $196.63.

Rather than reduce the site's eligible project costs by $196.63, USAC simply denied the project outright, and the net discount rate for the school was reduced from 40% to 0%.

Category Two budget-related denials are not limited to a handful of examples. Unfortunately, Margaret A. Neary Elementary School is no outlier. In fact, Category Two budget-related issues accounted for more than *one-fourth* of all Category Two denials in funding year 2017.[15] This number has increased significantly from funding years 2015 and 2016.

USAC's existing procedures have a chilling effect on applications for Category Two discounts. Although it is impossible to know how many applicants gave up applying for Category Two discounts altogether, it is possible to calculate just how many applicants submitted Category Two requests and were denied because of the Category Two budget calculation. In funding year 2017, 349 applicants received

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[13] Billed Entity Number 895.

[14] FCC Form 471 Application Number 171048155; Funding Request Number 1799109855.

[15] *See* Funds For Learning, LLC Supplemental Comments on Implementation of the E-rate Category Two Budget System at 2, available at https://www.fundsforlearning.com/docs/2018/02/FFL%20FFL%20-%20Comments%20-%20C2%20Budget%20Denials%202018-02-16.pdf.

Category Two denials because their project costs exceeded the USAC-calculated available budget.[16] This is equivalent to 4% of all funding year 2017 Category Two applicants. Applicants denied funding come from 49 states and include individual schools, school districts, libraries, and consortium applicants. A total of $36,883,739 was denied in funding year 2017.[17]

A more effective approach would be to allow applicants to list their entire Category Two project on an application and USAC simply reduce the committed amount to match the remaining budget amount. Such a change could improve the application process for schools and libraries, simplify the application review process for USAC, reduce delays in funding commitments, and increase Category Two participation.

III.   RELIEF SOUGHT

For the foregoing reasons, KIPP respectfully requests that the Commission (1) reverse USAC's decision on appeal and (2) direct USAC to issue a revised funding commitment decision based on the enrollment numbers provided. For all of the reasons above, the Commission should also instruct USAC to reconsider and revise its existing procedures and administration of Category Two funding requests.

Respectfully submitted,

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2575 Kelley Pointe Parkway
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June 14, 2018

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[16] *Id.*
[17] *Id.*

Exhibit A

October 16, 2017

School and Libraries Division
30 Lanidex Plaza West
Parsippany, NJ 07054

LETTER OF APPEAL

Applicant:	KIPP Chicago Schools
Billed Entity Number:	16057656
Funding Year:	2017
FCC Form 471 Application Number:	171034452
Funding Request Number:	1799076409

KIPP Chicago Schools ("KIPP"), by its undersigned representative, hereby appeals the funding commitment decision of the Schools and Libraries Division ("SLD") with respect to the above-captioned application.

I. BACKGROUND

On May 9, 2017, KIPP filed a funding year 2017 FCC Form 471, requesting E-rate program support for Category Two products and services. Included on the application was KIPP's network electronics funding request, FRN 1799076409, totaling $31,060.16.

On August 1, 2017, KIPP received a Program Integrity Assurance ("PIA") information request from the SLD. Because KIPP was on summer break, it requested to defer any application review during the summer period. KIPP selected the "Apply Summer or Winter Deferral" option in EPC on August 16, 2017, and, according to the notification provided, "the Summer or Winter Deferral [was] applied."

Although KIPP applied for the summer deferral option, on August 25, 2017, it received a Funding Commitment Decision Letter informing it that the SLD had denied funding for KIPP's network electronics FRN. The following explanations were provided in the decision letter:

> DR1: This funding request is being denied because you have not authorized sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget.

> DR2: The FRN is denied because the applicant failed to respond to the Administrator's Information Request.

KIPP reached out to the assigned PIA reviewer, insisting that it had selected the summer deferral option and requesting an explanation for the denial. The reviewer explained that the application was removed from summer deferral because there was a summer/holiday contact designated on the FCC Form 471. And the funding request was denied because KIPP failed to provide the requested information within the allowable period. The reviewer also informed KIPP that it would need to file an appeal to resolve the situation.

II. DISCUSSION

The SLD's denial of the funding request directly conflicts with USAC guidance. USAC, in its July 14, 2017 News Brief, provided the following instruction to applicants regarding the application review process during the summer period:

> We realize that, during a summer period and a winter period each year, many applicants are unavailable due to extended holiday and break schedules. PIA will put the review of your application on hold if we cannot make a live contact by telephone with the contact person or someone else who has been designated to respond to our questions.
>
> Our summer contact period is defined as the Friday before Memorial Day through the Friday after Labor Day. For 2017, the dates of the summer contact period are May 26 through September 8.
>
> If our first attempt to contact you was on or after May 26, and we cannot confirm that you are available to respond to our questions, we will put your review process on hold and not continue the review of your application until after September 8.
>
> You also have the option of requesting a summer deferral through EPC.[1]

KIPP timely applied for the summer deferral and was notified via EPC that the request was successfully submitted. At no point did the SLD contact any authorized KIPP representative. Nor did KIPP receive any written information requests during what should have been the summer period. According to USAC guidance, therefore, the SLD *should have* suspended any PIA review until September 8, 2017 (i.e., the end of the summer contact period).

KIPP also disagrees with the SLD reviewer's apparent assertion: that listing a holiday contact on an application, in effect, overrides an applicant's subsequent request for a summer deferral made via EPC. When KIPP inquired why the funding request had been denied, the SLD reviewer informed it that the application was removed from summer deferral status because KIPP had designated a holiday/summer contact. And because KIPP was required to provide the requested information within 15 days and did not, the funding requested for the FRN at issue was denied.

Although KIPP designated a summer/holiday on its application at the time of filing, neither USAC nor FCC rules preclude it from requesting that the application be placed on summer deferral once submitted – in this case months later. And as a practical matter, an applicant should be permitted defer any application review whether or not a holiday contact was listed on the FCC Form 471. Many schools and libraries are unavailable during the summer months, and circumstances may change from the certification date to the time the PIA review is initiated, *e.g.*, personnel or schedule changes or other circumstances beyond the control of an applicant.

III. RELIEF SOUGHT

For the foregoing reasons, KIPP Chicago School respectfully requests that USAC issue a revised Funding Commitment Decision Letter and approve FRN 1799076409.

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[1] *Information Requests from USAC – Summer Contact Period Started May 26*, Schools and Libraries Program News Brief (Universal Service Administrative Company), July 14, 2017, attached as Exhibit A.

In the alternative, KIPP requests that USAC rescind the original funding commitment decision and expeditiously complete its review of the application before again reaching a funding decision for the FRN at issue. [2]

Respectfully submitted,

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[2] To expedite the application review process, the information originally requested in the PIA review is attached as Exhibit B. The documentation from the Chicago Public Schools website confirms the student count for purposes of establishing a Category Two budget. Also included is a table listing the line item reductions necessary to bring the Category Two funding request under the Category Two budget.

Universal Service Administrative Co.

Schools and Libraries Program
News Brief

July 14, 2017

TIP OF THE WEEK: Remember that there are instructional videos posted in USAC's Online Learning Library. These videos provide information about using our online system for the first time and demonstrate how to file program forms.

Commitments for Funding Years 2017 and 2016

Funding Year 2017. USAC is scheduled to release Funding Year (FY) 2017 Wave 8 Funding Commitment Decision Letters (FCDLs) on July 21. This wave includes commitments for approved applications for all service types and at all discount levels. As of July 14, FY2017 commitments total over $452 million.

Funding Year 2016. USAC is scheduled to release Wave 55 FCDLs on July 18. This wave includes commitments for approved applications for all service types and at all discount levels. As of July 14, FY2016 commitments total over $2.81 billion.

On the date the FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in the E-rate Productivity Center (EPC).

Information Requests from USAC - Summer Contact Period Started May 26

USAC has procedures to contact applicants if Program Integrity Assurance (PIA) needs more information in order to complete its review of an FCC Form 471.

We realize that, during a summer period and a winter period each year, many applicants are unavailable due to extended holiday and break schedules. PIA will put the review of your application on hold if we cannot make a live contact by telephone with the contact person or someone else who has been designated to respond to our questions.

- Our summer contact period is defined as the Friday before Memorial Day through the Friday after Labor Day. For 2017, the dates of the summer contact period are May 26 through September 8.

If our first attempt to contact you was on or after May 26, and we cannot confirm that you are available to respond to our questions, we will put your review process on hold and not continue the review of your application until after September 8. You

can always contact us to restart the review of your application if you become available before September 8.

You also have the option of requesting a summer deferral through EPC. Please note the following:

- Due to a system issue, applicants have been temporarily unable to request summer deferrals for FY2017 application reviews. Consequently, if you want to request a summer deferral – even if the review of your application started before the summer contact period went into effect – you can do so as long as we have not already issued a commitment decision for your application in a funding wave.
- To put your application on summer deferral, you can contact your PIA reviewer directly. If you have not yet been in touch with your PIA reviewer, you can open a customer service case in EPC or call the Client Service Bureau (CSB) at 888-203-8100 and someone will get back to you.

Reminder of PIA review process

If PIA has questions for you, those questions will be posted in EPC. EPC will generate an email notifying the FCC Form 471 contact person that the questions are posted on the **Review Inquiries** page in EPC. The email contains a hyperlink to the questions.

You can also access the **Review Inquiries** page from the left-hand menu on the first screen of your certified FCC Form 471. Full- and partial-rights users on the organization's account can also see and respond to the PIA questions from this page.

USAC's customary procedure is as follows:

- USAC uses the FCC Form 471 main contact email address to send a notice that questions are available in EPC and posts the questions to the FCC Form 471. Full- or partial-rights users will not receive the email.
- If we have not heard from you or you provide only a partial response after seven days from our first attempt to contact you, we will send you a reminder and also inform your state E-rate coordinator via a separate email that we are attempting to contact you.
- If we have not heard from you after 15 days from our first attempt to contact you, you will receive a second notification reminding you to respond. If we still do not receive a response, we will use the information we have to complete the processing of your form.
- Note that applications on summer deferral will not start this process up again until after September.

If PIA has already contacted you and you wish to designate someone to answer questions in your absence, be sure to send your designee's contact information to your PIA reviewer. If PIA has not contacted you and your designee will be checking your messages, be sure that you have provided written authorization for your designee to answer questions about your application.

If PIA makes contact with someone representing your organization but that person is not in a position to answer PIA questions, they should clearly state to the PIA

reviewer that the review of your application should be put on hold until you are available.

You can ask for more time to respond if you need it.

Common Questions on FCC Form 470

Now that applicants are filing FCC Forms 470 for FY2017, we are providing answers to some common questions coming in to CSB.

When can I file an FCC Form 470?

You can file an FCC Form 470 for FY2017 now. The FCC Form 470 for a funding year is generally available online on July 1 of the year preceding that funding year.

What is an RFP and is one required?

In general, a Request for Proposal (RFP) is a formal bidding document that describes a project and requested services in sufficient detail so that potential bidders understand the scope, location, and any other requirements. RFPs may be known by a variety of names, for example, an Invitation for Bid (IFB) or Request for Quote (RFQ). In most instances, RFPs are not specifically required as part of the E-rate program, but you must issue one if it is required by your state or local competitive bidding or procurement rules.

We use "RFP" or "RFP document" generically to refer to any bidding document issued as part of your competitive bidding process that describes your project and requested services in more detail than in the fields provided on the FCC Form 470. If you are issuing an RFP and/or one or more RFP documents, you are required to upload those documents to your FCC Form 470.

What corrections can I make to my FCC Form 470?

You can make the following changes to a certified FCC Form 470:

- Edit the nickname you created for your form.
- Change the main contact person on the form.
- Edit the technical contact person you identified on the form.
- Add an RFP document.
    - o If you did not add at least one RFP document to your form before it was certified, you will have to certify a new form in order to be able to attach an RFP document.
    - o If you issue an RFP document AFTER an FCC Form 470 is certified, you must upload the document to that certified FCC Form 470.

How do I make corrections to the FCC Form 470?

- Navigate to the form in EPC. You can do this in two ways:
    - o Go to the bottom of your landing page and search for and locate your form using the search criteria provided or

- o Click the **Records** tab, choose **FCC Forms 470**, and use the search criteria provided in the left-hand margin to locate your form.
- Choose **Related Actions** from the left-hand menu.
- Click the appropriate link from the menu provided.

My FCC Form 470 does not show the correct number of entities. What do I need to do?

We strongly recommend updating the entities in your profile in EPC before you start a form. CSB can help you create entities, add and remove entities, and create annexes as needed. If you do this work before you certify your FCC Form 470, the number of entities should be correct.

However, if your entity count is not correct, you can add an RFP document to your form to explain the discrepancy (for example, if services are delivered to annexes that have a different address but EPC did not count them as separate entities). Remember, though, that you must have attached at least one RFP document to your form in order to add another one after the form is certified. Otherwise, you must start a new form.

What service/function should I list this service/product under on the FCC Form 470?

You may not be sure exactly where on the FCC Form 470 to list a particular product or service. If the product or service appears to fit into more than one category of service or service type, you should:

- List the product or service under all of the categories or service types where it fits, and
- Provide a detailed explanation in the narrative field and/or your RFP or RFP document.

What should I do if I certified an FCC Form 470 and left off some services?

The clearest way to proceed is to certify a new FCC Form 470 and include all of the services you want on that form and its associated RFP and/or RFP documents. If you attached an RFP document to the original form, you can attach another document to notify bidders that they should use the information in the new FCC Form 470 (include the new FCC Form 470 number) instead of the original one.

You can also attach one or more RFP documents to your existing form (again, if you attached at least one RFP document to that form before it was certified) to add the services that were omitted. Keep in mind that the addition of those services will probably be a cardinal change, and you must start your 28-day waiting period again from the date you add the document.

As a third option, you could certify a new FCC Form 470 that contains only the additional services. If you choose this option, be very clear whether you want bids

that include all of the products and services in both forms, or if you are willing to accept separate bids for the services on each form.

For more information on the FCC Form 470 and the competitive bidding process, you can refer to the following resources available on the USAC website:

- [Step 1 - Competitive Bidding](#) (Note the related documents in the grey area just below the title)
- [Step 2 - Selecting Service Providers](#)
- Instructional videos on the FCC Form 470 in the [Online Learning Library](#)
- "How to File FCC Form 470" (recorded webinar) posted on the [Webinar page](#).

Contact Us!
If you need assistance, please contact the Client Service Bureau (CSB) at (888) 203-8100.

KIPP - ONE

KIPP One Academy

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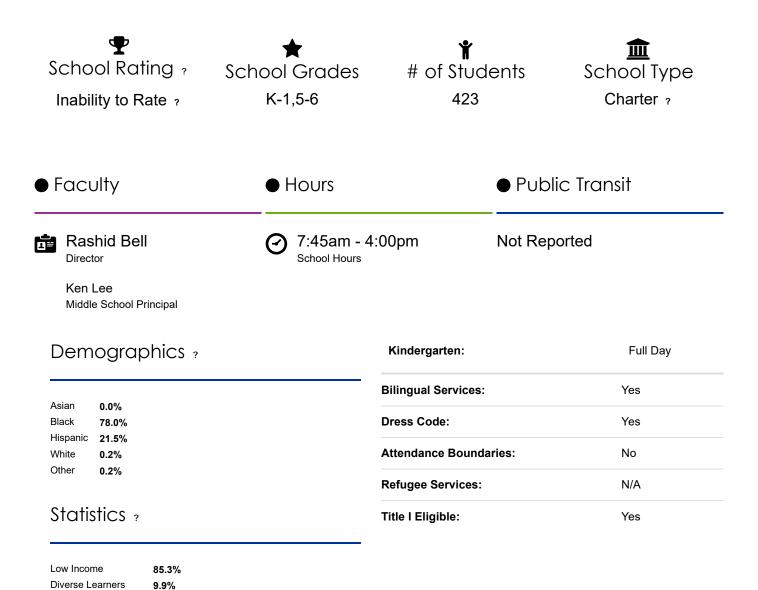
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📠 312-733-8163 (Fax)

📘 KIPPChicagoSchools/

KIPP One Academy is a school in the Humboldt Park neighborhood serving students in grades K & 5. We will expand each year (e.g., next year we will serve grades K-1 and 5-6) until we are a full grown K-8 school in the fall of 2020. The mission of KIPP One is to ensure our scholars develop the academic and character strengths to thrive in Chicago's best high schools, graduate from our nation's best colleges, and lead happy, peaceful lives. To achieve this mission, we provide our scholars daily, individual academic support, great teachers who effectively integrate technology to maximize learning, and a culture that encourages all of our "team and family" to become their best selves. Our KIPP Through College (KTC) program helps students apply to and enroll in excellent high schools, and continues to support KIPP graduates in high school and beyond to ensure they apply to, enroll in, and graduate from college.

🏆
School Rating ?
Inability to Rate ?

⭐
School Grades
K-1,5-6

🧍
of Students
423

🏛
School Type
Charter ?

● Faculty

● Hours

● Public Transit

🪪 **Rashid Bell**
Director

🕐 **7:45am - 4:00pm**
School Hours

Not Reported

Ken Lee
Middle School Principal

Demographics ?

Asian	0.0%
Black	78.0%
Hispanic	21.5%
White	0.2%
Other	0.2%

Statistics ?

Low Income	85.3%
Diverse Learners	9.9%
Limited English	8.0%

Kindergarten:	Full Day
Bilingual Services:	Yes
Dress Code:	Yes
Attendance Boundaries:	No
Refugee Services:	N/A
Title I Eligible:	Yes

Chicago Public Schools (/)

Students (/Pages/Students.aspx)

Schools (/Pages/AboutOurSchools.aspx)

About (/Pages/AboutCPS.aspx)

Calendar (/Pages/DistrictCalendar.aspx)

Staff (/Pages/Staff.aspx)

Topics (/Pages/Topics.aspx)

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 Twitter (https://twitter.com/ChiPubSchools)

 Youtube (http://www.youtube.com/user/ChiPubSchools)

 Linkedin (https://www.linkedin.com/company/chicago-public-schools)

 Blog (http://blog.cps.edu)

Quick Links

Contact Us (/About_CPS/Departments/Pages/Departments.aspx)

Careers (/careers)

CPS Stats and Facts (/stats)

News and Press Releases (/news)

What's New on CPS.EDU? (/Pages/whatsnew.aspx)

Chicago Public Schools is the third largest school district in the United States with more than 600 schools providing education to approximately 400,000 children. Our vision is that every student in every neighborhood will be engaged in a rigorous, well-rounded instructional program and will graduate prepared for success in college, career and life.

KIPP ONE

Category 2 Budget: $64,917.81

FY2016 Funding Requests

FRN: 1699094797
WAPs
Disbursed: $24,735.00

Line #	Product Type	Make	Model	Quantity	Unit Cost	Adjustment	Allocation
1	Access Point	Aerohive Networks	AH-ERATE-NGCS-3YR-130-FCC	35	$538.31	$0.00	$18,840.85
2	Installation, Activation, & Initial Configuration	Aerohive Networks	Installation & Labor	1	$10,259.15	$0.00	$10,259.15
					Totals:	**0**	**$29,100.00**

FY2017 Funding Requests

FRN: 1799076409
NE - KIPP One
Disbursed: $0.00

Line #	Product Type	Make	Model	Quantity	Unit Cost	Adjustment	Allocation
1	Access Point	Aerohive Networks	AP230	18	$478.50	$0.00	$8,613.00
2	Switch	Aruba	3800-24SFP-2SFP+ #J9584A#ABA	1	$4,042.83	$0.00	$4,042.83
3	Switch	Hewlett Packard	HPE Stacking Module J9577A	3	$681.53	$0.00	$2,044.59
4	Switch	Hewlett Packard	HPE Stacking Cable J9578A	6	$121.30	$0.00	$727.80
5	Switch	Hewlett Packard	HPE Transceiver J4858C	26	$158.32	$0.00	$4,116.32
6	Connectors	Tripplite	Patch Cable N318-07M	13	$17.09	$0.00	$222.17
7	Switch	Aruba	Aruba 2530-8G-PoE+ #J9774A#ABA	13	$317.63	$0.00	$4,129.19
8	Connectors	Tripplite	Patch Cable N316-01M	13	$11.19	$0.00	$145.47
9	Installation, Activation, & Initial Configuration	Other	N/A	1	$12,500.00	$723.56	$11,776.44
					Totals:	**$723.56**	**$35,817.81**

Funding Year 2016 Total	$29,100.00
Funding Year 2017 Total	$36,541.37
Grand Total	$65,641.37
Amount to be reduced	$723.56
Reduction amount made	$723.56
New Grand Total	$ 64,917.81

Exhibit B

Program Integrity Assurance Response
Funding Year 2017

Applicant Name:	**KIPP Chicago**
Billed Entity Number:	**16057656**
Form 471 Application Number:	**171034452**

Item 1

Category Two Budget

Issue

USAC's Program Integrity Assurance (PIA) team is currently reviewing your FCC Form 471 application, and we have identified an issue that we need you to help us resolve. What is the issue? The Category Two budget for insert Entity Number 16079516 Kipp One is $28,391.86, but the Category Two funding requested for this entity is $65,641.37. This is an issue because the entity's Category Two funding requests exceeds its budget by $37,249.51. (For reference, please read USAC's information on Category Two budgets at http://www.usac.org/sl/applicants/step03/category-two-budget.aspx). Please read all of the questions, descriptions, and requests below. Provide responses that most accurately reflect the status of the entities listed above. Please give enough detail, insight, and clarity to help the reviewers fully understand your specific situation. Check the boxes for statements that apply, and where applicable, type the information requested into the text boxes. If your information is too detailed for the text box, or if you need to provide additional documentation, click "Browse" to upload relevant files or documentation.

Question(s)

This page will timeout after an extended period of inactivity. Please periodically save your work using the 'Save & Close' button below. You may then use your browser's 'Back' button to return to your work.

Your response to PIA's questions:

#

Question

Response

1
Listed in the attached spreadsheet are the applicable pending and/or committed Category Two Funding Request Number 1799076409.

Sample Document: Category Two Budget Spreadsheet.xlsx

Fund Year	FCC Form 471 #	FRN	Total Eligible Cost Allocation for the BEN	Commitment Status
2016	161043062	1699094797	$29,100.00	Funded
2017	171034452	1799076409	$36,541.37	Pending
		FY 2017 Budget for Entity # 16079516	$28,391.86	
		Total Cost (FY2016 + FY207)	$65,641.37	
		Tota Difference	($37,249.51)	
		Your requested cost exceeds budget by	$37,249.51	

 2
Please complete the questions below and provide the information requested:

a
Would you like to reduce the pre-discount eligible cost allocation for the entity?

If Yes, you want to reduce the FRN line items to bring your entity within budget, please provide the FRN, line item number, and new eligible cost of the entity.

b
Would you like to remove the entity as a recipient of services?

If Yes, you want to remove this entity as a recipient of service from the FRNs/line items, please provide the FRN and line item number.

c
Would you like to cancel the FRN(s)?

If Yes, please provide the FRN number you want to cancel.

3
If the attached list includes committed Category Two FRN(s), have you submitted an FCC Form 500 to cancel or reduce the committed Category Two FRN(s)?

a
If Yes, please provide us with the FCC Form 500 number and the FRN Number that is

being canceled or reduced.

b

If No, please confirm that you do not plan on submitting an FCC Form 500 to cancel or reduce the committed Category Two FRN(s). Check the box.

4

If you would like to provide any additional information about these issues that have not been addressed above: Use the text box to type information, or upload additional documentation using the "Browse" button.

Item 1 Response

1. Uploaded response to question 1.

2a. Yes. See attached for detail. Due to the increased student count verified in this response, FRN 1799076409 line item 9 should be reduced from $12,500.00 to $9,627.86 to account for the $2,872.14 the site is over budget. The new eligible cost of the entity is $62,769.23.

2b. No.

2c. No.

3. No.

3a. A Form 500 will be submitted to reduce the FRN but has not been done at this time. Once submitted we will provide the Form 500 number.

3b. Box should not be checked.

4. See Item 1 response for complete response. Additional uploaded document is validation for the increased student count of 409 at KIPP One; this verifies the correct C2 budget amount of $62,769.23.

KIPP ONE

Requested Amount: $65,641.37 | Category 2 Budget: $62,769.23 | Reduction Amount: $2,872.14

FY2016 Funding Requests

FRN: 1699094797
WAPs
Disbursed: $24,735.00

Line #	Product Type	Make	Model	Quantity	Allocation	Invoiced Amount	Amount Available for Reduction	Reduction Amount	New Allocation
1	Access Point	Aerohive Networks	AH-ERATE-NGCS-3YR-130-FCC	35	$18,840.85	$18,840.85	$0.00	$0.00	$18,840.85
2	Installation, Activation, & Initial Configuration	Aerohive Networks	Installation & Labor	1	$10,259.15	$10,259.15	$0.00	$0.00	$10,259.15
			Totals:		**$29,100.00**	**$29,100.00**	**$0.00**	**$0.00**	**$29,100.00**

FY2017 Funding Requests

FRN: 1799076409
NE - KIPP One
Disbursed: $0.00

Line #	Product Type	Make	Model	Quantity	Allocation	Invoiced Amount	Amount Available for Reduction	Reduction Amount	New Allocation
1	Access Point	Aerohive Networks	AP230	18	$8,613.00	$0.00	$8,613.00	$0.00	$8,613.00
2	Switch	Aruba	3800-24SFP-2SFP+ #J9584A#ABA	1	$4,042.83	$0.00	$4,042.83	$0.00	$4,042.83
3	Switch	Hewlett Packard	HPE Stacking Module J9577A	3	$2,044.59	$0.00	$2,044.59	$0.00	$2,044.59
4	Switch	Hewlett Packard	HPE Stacking Cable J9578A	6	$727.80	$0.00	$727.80	$0.00	$727.80
5	Switch	Hewlett Packard	HPE Transceiver J4858C	26	$4,116.32	$0.00	$4,116.32	$0.00	$4,116.32
6	Connectors	Tripplite	Patch Cable N318-07M	13	$222.17	$0.00	$222.17	$0.00	$222.17
7	Switch	Aruba	Aruba 2530-8G-PoE+ #J9774A#ABA	13	$4,129.19	$0.00	$4,129.19	$0.00	$4,129.19
8	Connectors	Tripplite	Patch Cable N316-01M	13	$145.47	$0.00	$145.47	$0.00	$145.47
9	Installation, Activation, & Initial Configuration	Other	N/A	1	$12,500.00	$0.00	$12,500.00	$2,872.14	$9,627.86
			Totals:		**$36,541.37**	**$0.00**	**$36,541.37**	**$2,872.14**	**$33,669.23**

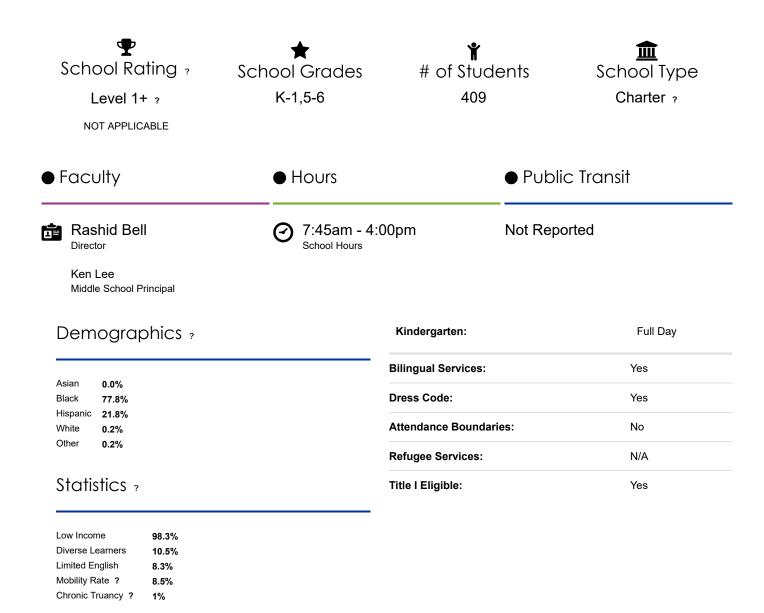|									
Funding Year 2016 Total					$29,100.00			$0.00	$29,100.00
Funding Year 2017 Total					$36,541.37			$2,872.14	$33,669.23
Grand Total					**$65,641.37**			**$2,872.14**	**$62,769.23**

KIPP - ONE

KIPP One Academy

📍 730 N Pulaski Chicago, IL 60624-1063

🌐 www.kippchicago.org 📞 773-938-8578
📠 312-733-8163 (Fax)

📘 KIPPChicagoSchools/

KIPP One Academy is a school in the Humboldt Park neighborhood serving students in grades K-1 and 5-6. We will expand each year (e.g., next year we will serve grades K-2 and 5-7) until we are a full grown K-8 school in the fall of 2020. The mission of KIPP One is to ensure our scholars develop the academic and character strengths to thrive in Chicago's best high schools, graduate from our nation's best colleges, and lead happy, peaceful lives. To achieve this mission, we provide our scholars daily, individual academic support, great teachers who effectively integrate technology to maximize learning, and a culture that encourages all of our "team and family" to become their best selves. Our KIPP Through College (KTC) program helps students apply to and enroll in excellent high schools, and continues to support KIPP graduates in high school and beyond to ensure they apply to, enroll in, and graduate from college.

🏆 School Rating ?	⭐ School Grades	🧍 # of Students	🏛 School Type
Level 1+ ?	K-1,5-6	409	Charter ?
NOT APPLICABLE			

● Faculty	● Hours	● Public Transit
Rashid Bell Director	🕐 7:45am - 4:00pm School Hours	Not Reported
Ken Lee Middle School Principal		

Demographics ?

Asian	**0.0%**
Black	**77.8%**
Hispanic	**21.8%**
White	**0.2%**
Other	**0.2%**

Statistics ?

Low Income	**98.3%**
Diverse Learners	**10.5%**
Limited English	**8.3%**
Mobility Rate ?	**8.5%**
Chronic Truancy ?	**1%**

Kindergarten:	Full Day
Bilingual Services:	Yes
Dress Code:	Yes
Attendance Boundaries:	No
Refugee Services:	N/A
Title I Eligible:	Yes

Chicago Public Schools (/)

Students (/Pages/Students.aspx)

Schools (/Pages/AboutOurSchools.aspx)

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 Linkedin (https://www.linkedin.com/company/chicago-public-schools)

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Chicago Public Schools is the third largest school district in the United States with more than 600 schools and serves 371,000 children. Our vision is that every student in every neighborhood will be engaged in a rigorous, well-rounded instructional program and will graduate prepared for success in college, career and life.

Non-Discrimination Statement (/NonDiscrimination)

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Exhibit C

![Universal Service Administrative Co.]

Revised Funding Commitment Decision Letter
Funding Year 2017

Contact Information:
Chris Haid
KIPP CHICAGO SCHOOLS
2007 South Halsted
CHICAGO, IL 60608
chaid@kippchicago.org

BEN: 16057656
Post Commitment Wave: 17

Totals

Original Commitment Amount	$0.00
Revised Commitment Amount	**$0.00**

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2017 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. **File the FCC Form 486,** Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).

- o **If USAC approved funding on an FRN in your original FCDL,** the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
- o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL,** the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).

2. **Invoice USAC,** if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
   - **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
   - **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
   - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time,** USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC,** visit the Appeals section in the [E-rate Productivity Center (EPC)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.

- **To request a waiver of the FCC's rules or appeal USAC's appeal decision,** please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System](#) (ECFS). Include your contact information, a statement that your filing is a waiver request,

identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.

Revised Funding Commitment Decision Overview
Funding Year 2017

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1799076409	Current Technologies Corporation	Appeals	$0.00	**Denied**

Post Commitment Request Number:	Post Commitment Request Type:	Post Commitment Decision:
79605	Appeals	Denied

FRN:	Service Type:	Original Status:	Revised Status:
1799076409	Internal Connections	Denied	Denied

FCC Form 471: 171034452

Dollars Committed			
Monthly Cost		**One-Time Cost**	
Months of Service	**12**		
Total Eligible Recurring Charges	**$0.00**	Total Eligible One Time Charges	**$36,541.37**
Total Pre-Discount Charges		$36,541.37	
Discount Rate		85.00%	
Revised Committed Amount		$0.00	

Dates	
Service Start Date	**7/1/2017**
Contract Expiration Date	**9/30/2018**
Contract Award Date	**5/3/2017**
Service Delivery Deadline	**9/30/2018**
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	**Current Technologies Corporation**
SPIN (498ID)	**143006151**
Contract Number	**N/A**
Account Number	
Establishing FCC Form 470	**170063037**

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:

Post Commitment Rationale:

The entity 16079516 Kipp One requested pre-discount funding amount for Category Two Services in excess of its Category Two budget of $28,391.86. During PIA review of FCC Form 471# 171034452, you did not authorize sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget and the amount requested is over the entity's Category Two budget by $37,249.51. Accordingly, your request was denied. On appeal you requested to reduce FRN 1799076409 line item 9 from $12,500.00 to $9,627.86 to make an actual reduction of $2,872.14. You also requested to revise the total number of Full Time student count from 185 to 409. The requested revision of the student count is not allowed during the post-commit appeal review since this modification was not requested during PIA review or before the Funding Commitment Decision Letter (FCDL) was

issued. On appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.|
Your funding request(s) for Category Two Services was/were denied because the entity associated with the funding
request(s) has/have requested pre-discount Category Two funding that exceeds its Category Two Budget. FCC
rules provide that each eligible school or library shall be eligible for a budgeted amount of support for Category Two
services over a five-year funding cycle. Excluding support for internal connections received prior to FY 2015, each
school or library shall be eligible for the total available budget less any support received for Category Two services
in the prior four funding years. See 47 C.F.R. sec. 54.502 (b)(1). Each eligible school shall be eligible for support for
Category Two services up to a pre-discount price of $150 per student over a five-year funding cycle. Applicants shall
provide the student count per school, calculated at the time that the discount is calculated each funding year. New
schools may estimate the number of students, but shall repay any support provided in excess of the maximum budget
based on student enrollment the following funding year. See 47 C.F.R. sec. 54.502 (b)(2). |Each eligible library
located within the Institute of Museum and Library Services locale codes of 11 – City, Large, defined as a territory
inside an urbanized area and inside a principal city with a population of 250,000 or more, 12 – City, Midsize, defined
as a territory inside an urbanized area and inside a principal city with a population less than 250,000 and greater than
or equal to 100,000, or 21 – Suburb, Large, defined as a territory outside a principal city and inside an urbanized
area with population of 250,000 or more, shall be eligible for support for Category Two services, up to a pre-discount
price of $5.00 per square foot over a five-year funding cycle. All other eligible libraries shall be eligible for support for
Category Two services, up to a pre-discount price of $2.30 per square foot over a five-year funding cycle. See 47
C.F.R. sec. 54.502 (b)(3). Each eligible school and library will be eligible for support for Category Two services up
to at least a pre-discount price of $9,200 over five funding years. See 47 C.F.R. sec. 54.502 (b)(4). Applicants shall
request support for Category Two services for each school or library based on the number of students per school
building or square footage per library building. See 47 C.F.R. sec. 54.502 (b)(5). When applying for Category Two
support for eligible services to a non-instructional school building or library administrative building, the applicant shall
allocate the cost of providing services to one or more of the eligible school or library buildings that benefit from those
services being provided. See 47 C.F.R. sec. 54.502 (b)(6).

Exhibit D

Universal Service Administrative Co.

Schools and Libraries Program News Brief

July 14, 2017

TIP OF THE WEEK: Remember that there are instructional videos posted in USAC's Online Learning Library. These videos provide information about using our online system for the first time and demonstrate how to file program forms.

Commitments for Funding Years 2017 and 2016

Funding Year 2017. USAC is scheduled to release Funding Year (FY) 2017 Wave 8 Funding Commitment Decision Letters (FCDLs) on July 21. This wave includes commitments for approved applications for all service types and at all discount levels. As of July 14, FY2017 commitments total over $452 million.

Funding Year 2016. USAC is scheduled to release Wave 55 FCDLs on July 18. This wave includes commitments for approved applications for all service types and at all discount levels. As of July 14, FY2016 commitments total over $2.81 billion.

On the date the FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in the E-rate Productivity Center (EPC).

Information Requests from USAC - Summer Contact Period Started May 26

USAC has procedures to contact applicants if Program Integrity Assurance (PIA) needs more information in order to complete its review of an FCC Form 471.

We realize that, during a summer period and a winter period each year, many applicants are unavailable due to extended holiday and break schedules. PIA will put the review of your application on hold if we cannot make a live contact by telephone with the contact person or someone else who has been designated to respond to our questions.

- Our summer contact period is defined as the Friday before Memorial Day through the Friday after Labor Day. For 2017, the dates of the summer contact period are May 26 through September 8.

If our first attempt to contact you was on or after May 26, and we cannot confirm that you are available to respond to our questions, we will put your review process on hold and not continue the review of your application until after September 8. You

can always contact us to restart the review of your application if you become available before September 8.

You also have the option of requesting a summer deferral through EPC. Please note the following:

- Due to a system issue, applicants have been temporarily unable to request summer deferrals for FY2017 application reviews. Consequently, if you want to request a summer deferral – even if the review of your application started before the summer contact period went into effect – you can do so as long as we have not already issued a commitment decision for your application in a funding wave.
- To put your application on summer deferral, you can contact your PIA reviewer directly. If you have not yet been in touch with your PIA reviewer, you can open a customer service case in EPC or call the Client Service Bureau (CSB) at 888-203-8100 and someone will get back to you.

Reminder of PIA review process

If PIA has questions for you, those questions will be posted in EPC. EPC will generate an email notifying the FCC Form 471 contact person that the questions are posted on the **Review Inquiries** page in EPC. The email contains a hyperlink to the questions.

You can also access the **Review Inquiries** page from the left-hand menu on the first screen of your certified FCC Form 471. Full- and partial-rights users on the organization's account can also see and respond to the PIA questions from this page.

USAC's customary procedure is as follows:

- USAC uses the FCC Form 471 main contact email address to send a notice that questions are available in EPC and posts the questions to the FCC Form 471. Full- or partial-rights users will not receive the email.
- If we have not heard from you or you provide only a partial response after seven days from our first attempt to contact you, we will send you a reminder and also inform your state E-rate coordinator via a separate email that we are attempting to contact you.
- If we have not heard from you after 15 days from our first attempt to contact you, you will receive a second notification reminding you to respond. If we still do not receive a response, we will use the information we have to complete the processing of your form.
- Note that applications on summer deferral will not start this process up again until after September.

If PIA has already contacted you and you wish to designate someone to answer questions in your absence, be sure to send your designee's contact information to your PIA reviewer. If PIA has not contacted you and your designee will be checking your messages, be sure that you have provided written authorization for your designee to answer questions about your application.

If PIA makes contact with someone representing your organization but that person is not in a position to answer PIA questions, they should clearly state to the PIA

reviewer that the review of your application should be put on hold until you are available.

You can ask for more time to respond if you need it.

Common Questions on FCC Form 470

Now that applicants are filing FCC Forms 470 for FY2017, we are providing answers to some common questions coming in to CSB.

When can I file an FCC Form 470?

You can file an FCC Form 470 for FY2017 now. The FCC Form 470 for a funding year is generally available online on July 1 of the year preceding that funding year.

What is an RFP and is one required?

In general, a Request for Proposal (RFP) is a formal bidding document that describes a project and requested services in sufficient detail so that potential bidders understand the scope, location, and any other requirements. RFPs may be known by a variety of names, for example, an Invitation for Bid (IFB) or Request for Quote (RFQ). In most instances, RFPs are not specifically required as part of the E-rate program, but you must issue one if it is required by your state or local competitive bidding or procurement rules.

We use "RFP" or "RFP document" generically to refer to any bidding document issued as part of your competitive bidding process that describes your project and requested services in more detail than in the fields provided on the FCC Form 470. If you are issuing an RFP and/or one or more RFP documents, you are required to upload those documents to your FCC Form 470.

What corrections can I make to my FCC Form 470?

You can make the following changes to a certified FCC Form 470:

- Edit the nickname you created for your form.
- Change the main contact person on the form.
- Edit the technical contact person you identified on the form.
- Add an RFP document.
    - If you did not add at least one RFP document to your form before it was certified, you will have to certify a new form in order to be able to attach an RFP document.
    - If you issue an RFP document AFTER an FCC Form 470 is certified, you must upload the document to that certified FCC Form 470.

How do I make corrections to the FCC Form 470?

- Navigate to the form in EPC. You can do this in two ways:
    - Go to the bottom of your landing page and search for and locate your form using the search criteria provided or

- o Click the **Records** tab, choose **FCC Forms 470**, and use the search criteria provided in the left-hand margin to locate your form.
- Choose **Related Actions** from the left-hand menu.
- Click the appropriate link from the menu provided.

My FCC Form 470 does not show the correct number of entities. What do I need to do?

We strongly recommend updating the entities in your profile in EPC before you start a form. CSB can help you create entities, add and remove entities, and create annexes as needed. If you do this work before you certify your FCC Form 470, the number of entities should be correct.

However, if your entity count is not correct, you can add an RFP document to your form to explain the discrepancy (for example, if services are delivered to annexes that have a different address but EPC did not count them as separate entities). Remember, though, that you must have attached at least one RFP document to your form in order to add another one after the form is certified. Otherwise, you must start a new form.

What service/function should I list this service/product under on the FCC Form 470?

You may not be sure exactly where on the FCC Form 470 to list a particular product or service. If the product or service appears to fit into more than one category of service or service type, you should:

- List the product or service under all of the categories or service types where it fits, and
- Provide a detailed explanation in the narrative field and/or your RFP or RFP document.

What should I do if I certified an FCC Form 470 and left off some services?

The clearest way to proceed is to certify a new FCC Form 470 and include all of the services you want on that form and its associated RFP and/or RFP documents. If you attached an RFP document to the original form, you can attach another document to notify bidders that they should use the information in the new FCC Form 470 (include the new FCC Form 470 number) instead of the original one.

You can also attach one or more RFP documents to your existing form (again, if you attached at least one RFP document to that form before it was certified) to add the services that were omitted. Keep in mind that the addition of those services will probably be a cardinal change, and you must start your [28-day waiting period](#) again from the date you add the document.

As a third option, you could certify a new FCC Form 470 that contains only the additional services. If you choose this option, be very clear whether you want bids

that include all of the products and services in both forms, or if you are willing to accept separate bids for the services on each form.

For more information on the FCC Form 470 and the competitive bidding process, you can refer to the following resources available on the USAC website:

- [Step 1 - Competitive Bidding](#) (Note the related documents in the grey area just below the title)
- [Step 2 - Selecting Service Providers](#)
- Instructional videos on the FCC Form 470 in the [Online Learning Library](#)
- "How to File FCC Form 470" (recorded webinar) posted on the [Webinar page](#).

Contact Us!
If you need assistance, please contact the Client Service Bureau (CSB) at (888) 203-8100.