

August 1, 2019

VIA ELECTRONIC FILING

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

Re: **Ex Parte Submission**

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

Dear Ms. Dortch:

On July 30, 2019, I provided FCC staff with a copy of the attached *2019 E-rate Trends Report*. I shared a copy with Narali Patel, Wireline Advisor for Chairman Pai. In another meeting, I shared the report with members of the Wireline Competition Bureau: Kris Monteith, Bureau Chief, D'wana Terry, Associate Bureau Chief, and the following members of the Telecommunications Access Policy Division: Ryan Palmer, Division Chief, and Gabriella Gross, Deputy Division Chief. Because I had previously provided a presentation of these findings¹, I did not comment on the report other than to encourage the FCC staff to read the 525 anonymous applicant comments provided on pages 33 through 59 of the report.

Respectfully submitted,

/s/ John D. Harrington

John D. Harrington

Chief Executive Officer
Funds For Learning, LLC
2575 Kelley Pointe Parkway, Suite 200
Edmond, OK 73013

¹ See <https://ecfsapi.fcc.gov/file/1061334819182/FY2019ApplicantSurvey-ExParte2019-06-10.pdf>



2019 E-RATE TRENDS REPORT

by Funds For Learning

A Note from John Harrington

Dear E-rate Stakeholder,

The purpose of the 2019 E-rate Trends Report is to provide a clear picture of the E-rate program from those who understand it the best: schools and libraries.

As a society, we owe it to our students to prepare them for all that the future holds. Broadband internet plays a central support role in the education of those students, and it is the federal E-rate funding program that delivers internet connections to nearly every K-12 school and library in the United States.

Like the technology it supports, the E-rate program must continue to evolve and mature. The past success of this program is not happenstance and its future success should not be taken for granted. New regulations currently being considered hold the opportunity to increase or decrease the program's efficacy, and the results will impact millions of lives.

Thank you for taking time to read this report. I particularly urge you to read the individual comments from applicants. There is no better way to get informed about the E-rate program than to listen directly to those that are in the trenches applying for and using the funds. Knowing what is working for them and what could be better is the key to a stronger, more effective E-rate program.

Sincerely,

John Harrington







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About the E-rate Discount Program

Universal Service Funding for Schools and Libraries, commonly referred to as the E-rate program, provides discounts to eligible entries in the United States towards the purchase of goods and services necessary to connect students and library patrons to the Internet.

About the Report

The E-rate program supports nearly every school and library in America, annually providing billions of dollars of much needed support for Internet access, telecommunications, and computer networking. Over 21,600 applicants and 4,000 vendors currently participate in the program. For most, their perception of the program is limited to a handful of funding requests and a few personal interactions with USAC customer service representatives.

The purpose of this analysis is to provide stakeholders with a broader picture of the E-rate program. The data and information provided is derived from publicly available funding request data as well as a nationwide survey of applicants conducted in May 2019. All information is current as of June 3, 2019.

This report is not intended to be an encyclopedic review of the program. There are many additional statistics and reports that could be presented. Furthermore, while we strive to be fair and even-handed, this is not a scientific analysis conducted by an independent third-party.

It is our hope that this information will serve as a catalyst for discussion, new ideas, and ultimately, further improvements to this vital program.

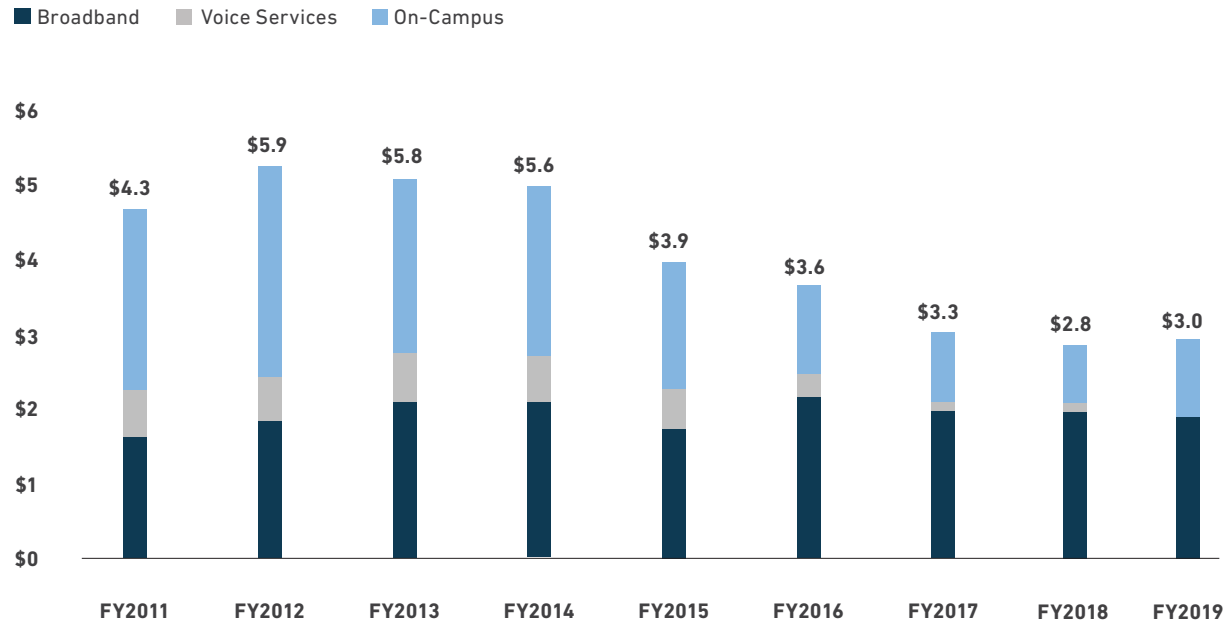
THE 2019 REQUEST DATA

E-rate funding request data is publicly available and provides unique insight into the communications needs of schools and libraries. The most basic data includes an applicant's name, their service provider(s), E-rate discount rate, and the category of the goods and services being requested (Internet access, telephone service, internal connections, and so on). This data has been available since year one of the program and provides the most consistent source of data for year-to-year comparisons.

Beginning in 2015, applications have required detailed line item information for each funding request, such as specific line counts, connection speeds, unit quantities, and make and models of equipment. There is variation in how applicants prepare their responses. As more data is collected and as applicants receive consistent guidance, it is expected that the detailed funding request information will become more useful for year-to-year trend analysis.

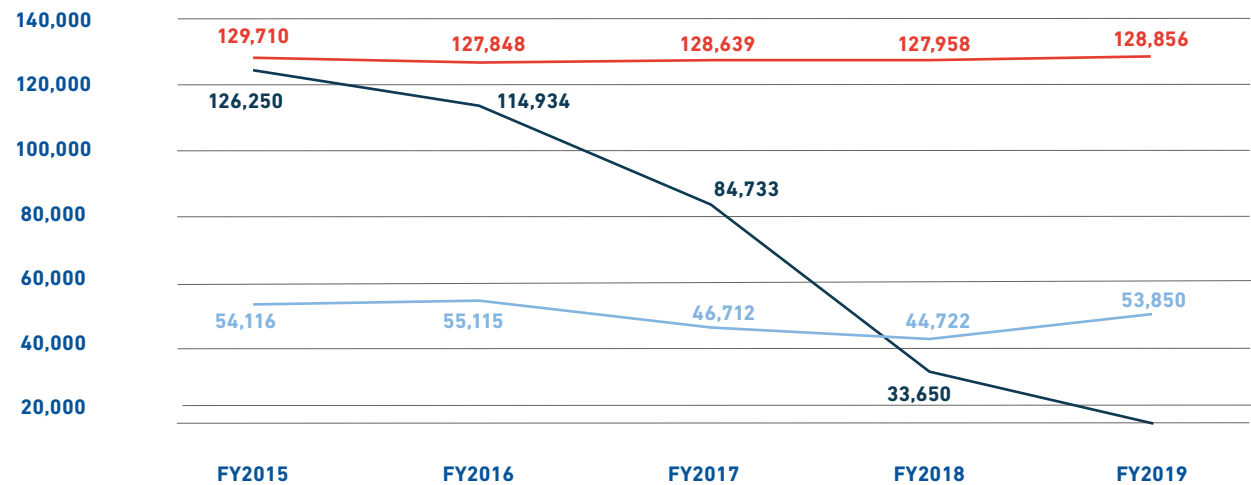
E-rate Discounts Requested (FY2011-FY2019)

(IN BILLIONS)



Count of Sites Receiving E-rate Discounts

Legend: Data/Internet (red), Voice Services (dark blue), On-Campus (light blue)



2019 Request Data

117,300

Count of Sites Receiving E-rate Discounts in 2019

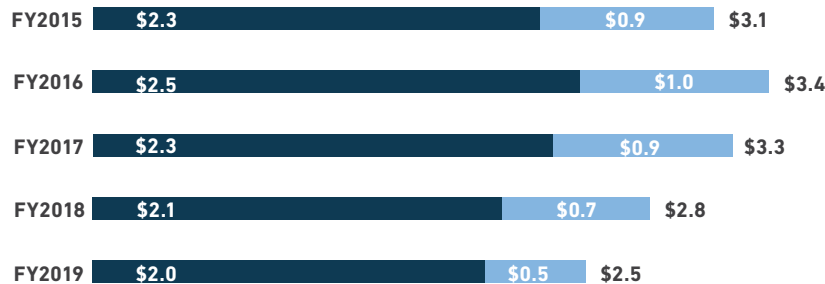
35,930

Count of Form 471s Filed in 2019

E-rate Internet and Data Services ("C1")

(IN BILLIONS)

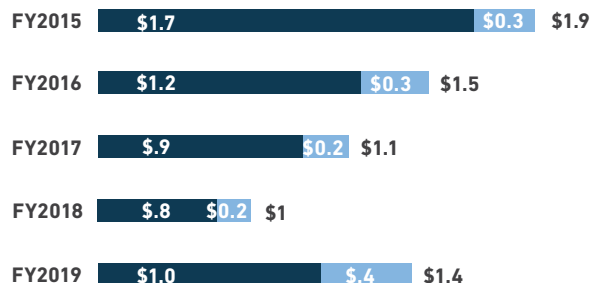
■ E-rate Discount ■ Applicant Payment



E-rate On-Campus Wi-Fi and LAN ("C2")

(IN BILLIONS)

■ E-rate Discount ■ Applicant Payment



FY19 Category 1 Spending by Product Type

(IN MILLIONS)

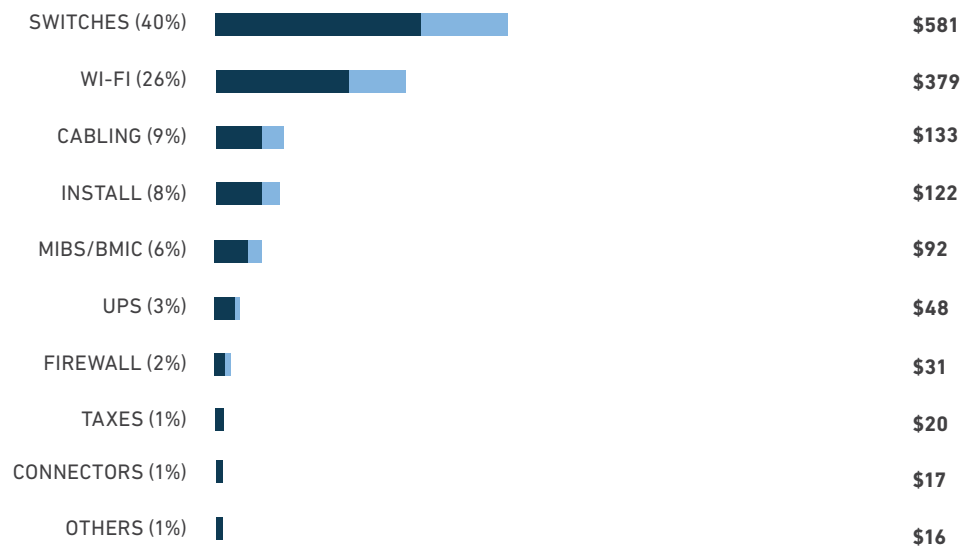
■ E-rate Discount ■ Applicant Payment



FY19 Category 2 Spending by Product Type

(IN MILLIONS)

■ E-rate Discount ■ Applicant Payment





THE 2019 APPLICANT SURVEY

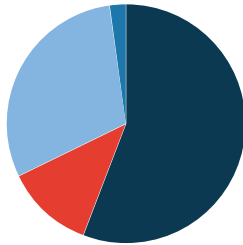
In May of 2019, Funds For Learning conducted its 9th annual E-rate survey, designed to gather feedback and insight from the schools and libraries who participate in the program. The survey is necessary because E-rate funding request data paints an incomplete picture. Not all information is gathered on Form 471 funding applications. For example, applicants may have need of services that currently do not qualify for E-rate discounts. These services are not included on funding applications.

Additionally, there is no basic mechanism for applicants to provide feedback to the FCC about the administration of the program. Applicants can submit Letters of Appeal to the FCC; however, this only captures a certain subset of feedback, mainly negative feedback, related to specific USAC actions or decisions. There is no forum for applicants to express what is working well.

This year's survey received 1,763 applicant responses, corresponding to approximately 1 out of 12 E-rate applicants. Because the respondents represent a cross-section of applicants that closely matches the overall population of E-rate applicants, we believe that this survey provides most accurate picture available to understand the overall needs and experience of E-rate applicants as of the spring of 2019.

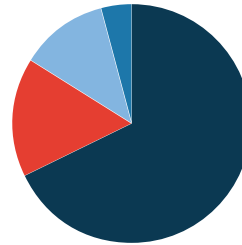
Survey Demographics

Applicant Type



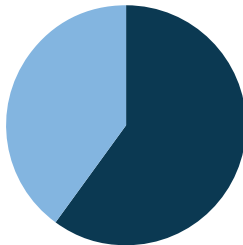
56%	District
12%	Library
30%	School
2%	Consortium

Surveyed Applicant Type



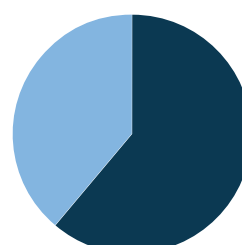
68%	District
16%	Library
12%	School
4%	Consortium

Applicant Location



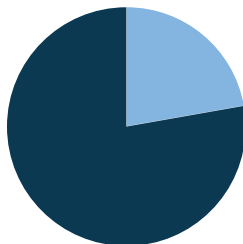
60%	Rural
40%	Urban

Surveyed Applicant Location



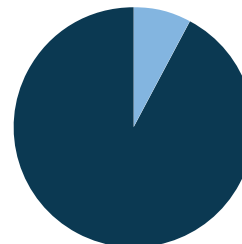
61%	Rural
39%	Urban

Applicant Public or Non-Public Institution



78%	Public
22%	Non-Public

Surveyed Public or Non-Public Institution



92%	Public
8%	Non-Public

Survey Measures the Success of the E-rate Program





94%

of applicants say that E-rate support is mission critical

70%

of applicants see lower prices

84%

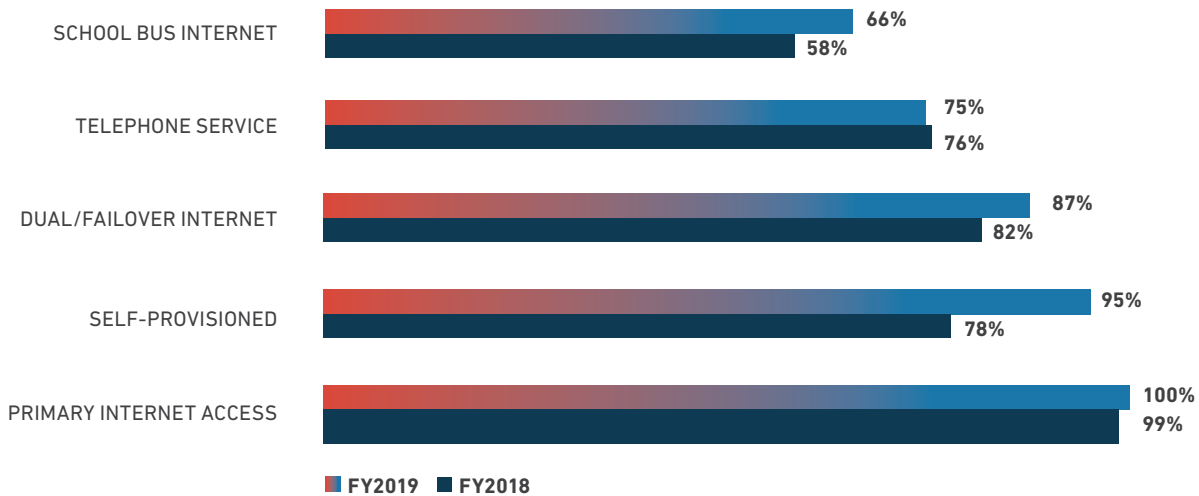
of applicants depend on and trust the E-rate program



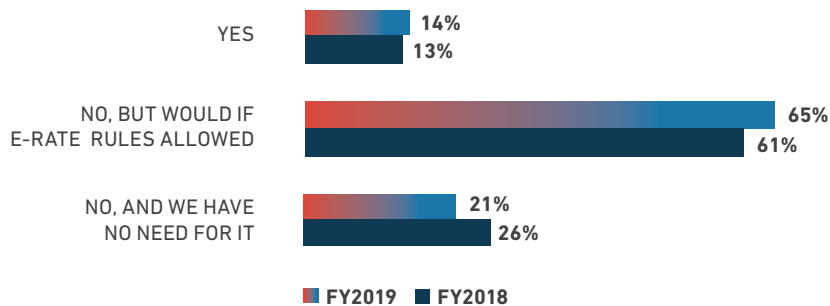
School and Library Networks

CATEGORY 1

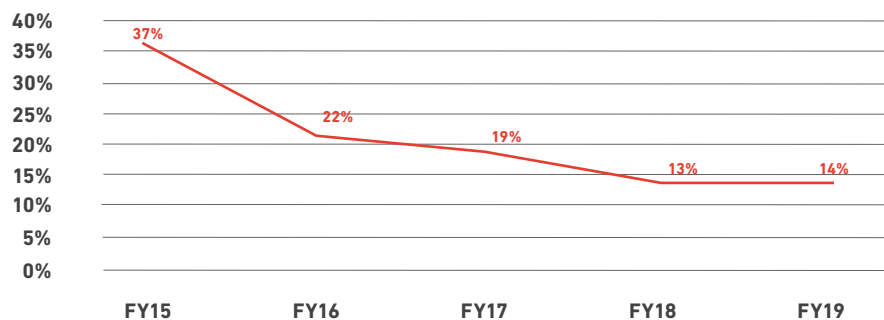
Which of the following services should qualify for E-rate support?



Do you have dual Internet connections (i.e. for load balancing, high availability Internet, etc.)?



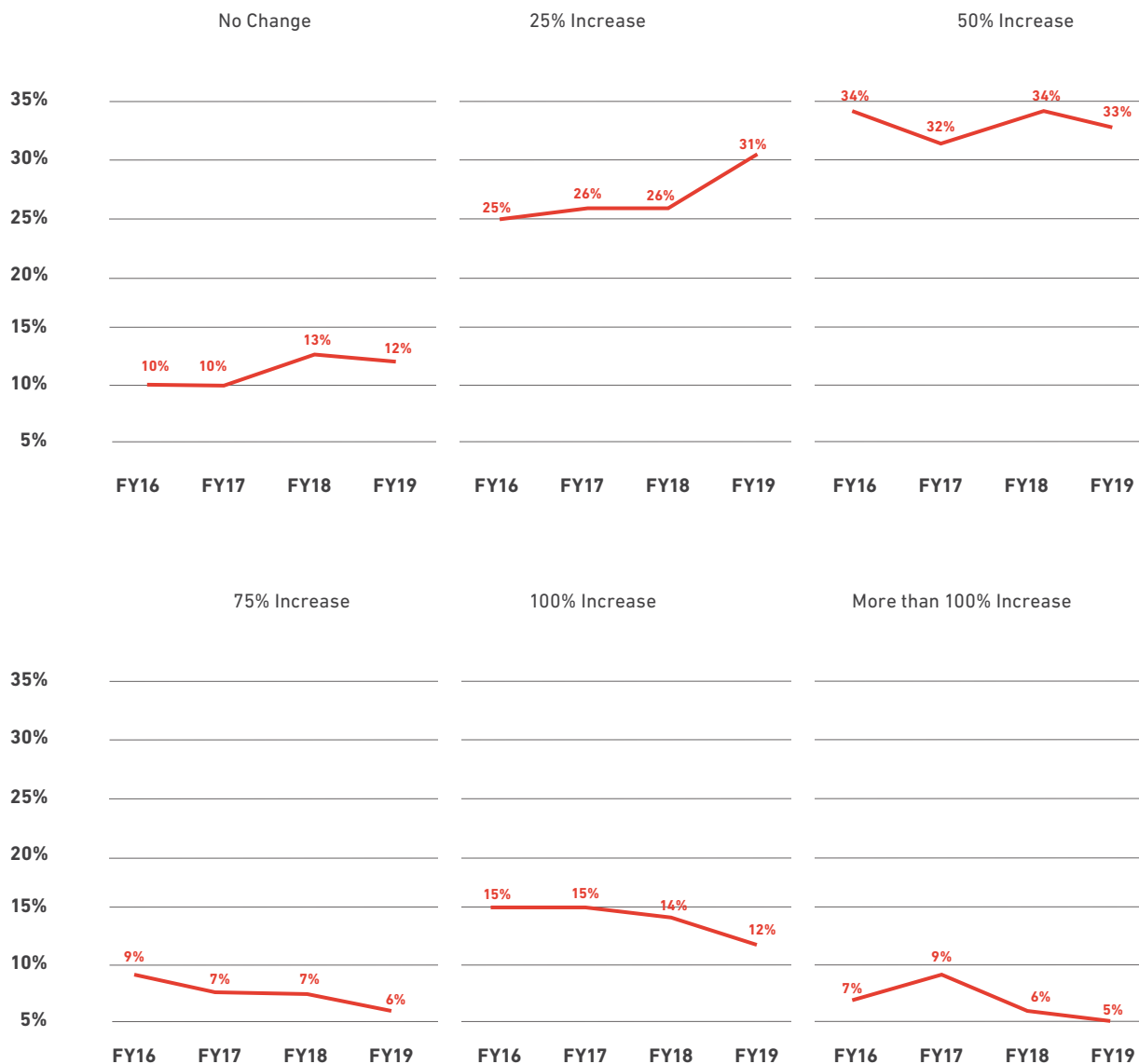
Surveyed Applicants with Dual Internet Connections



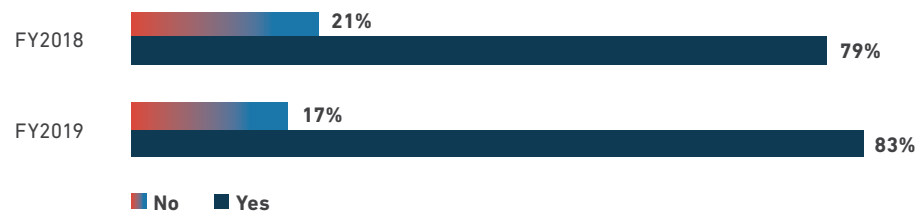
School and Library Networks

CATEGORY 1

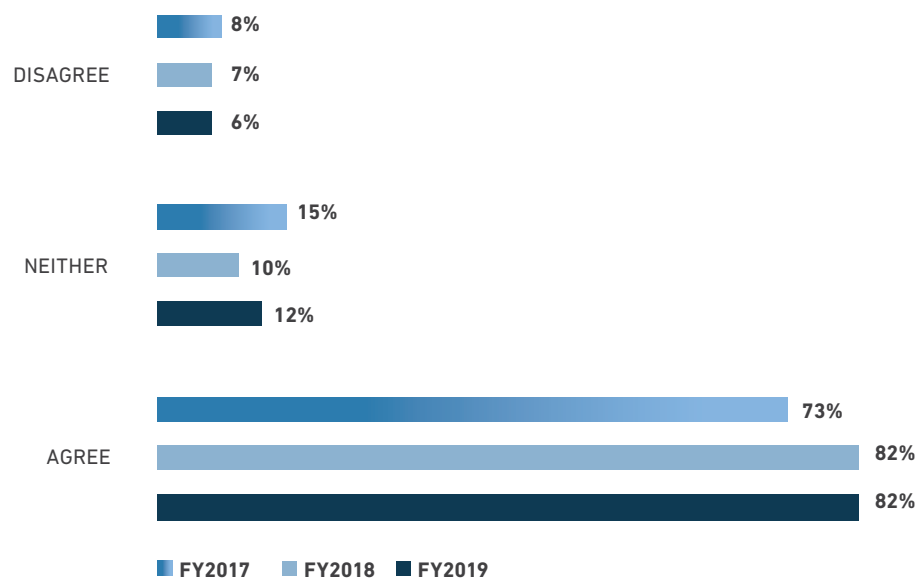
How much do you expect your Internet bandwidth needs to change over the next 3 years?



If permitted to share Internet access off-campus at no additional cost to the E-rate program, would you?



Insufficient Internet access to home of students or library patrons is a significant issue in our community.

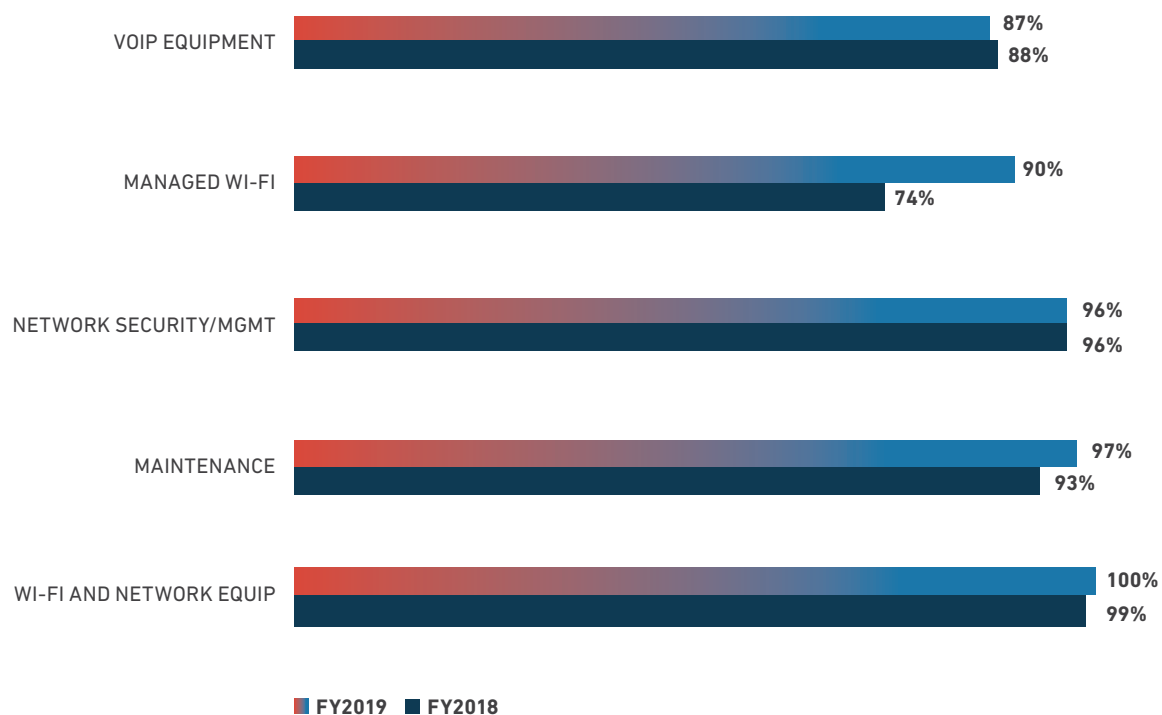


School and Library Networks

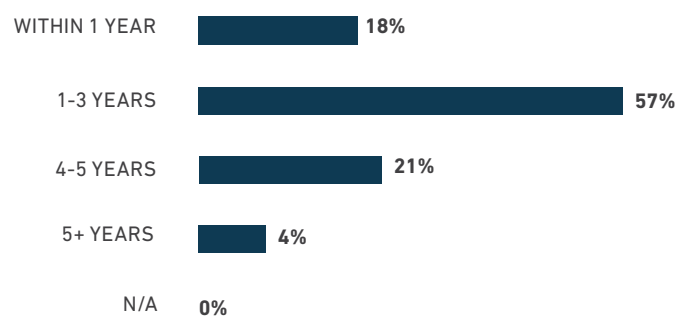
CATEGORY 2



Indicate which of the following services should qualify for E-rate support ("C2")



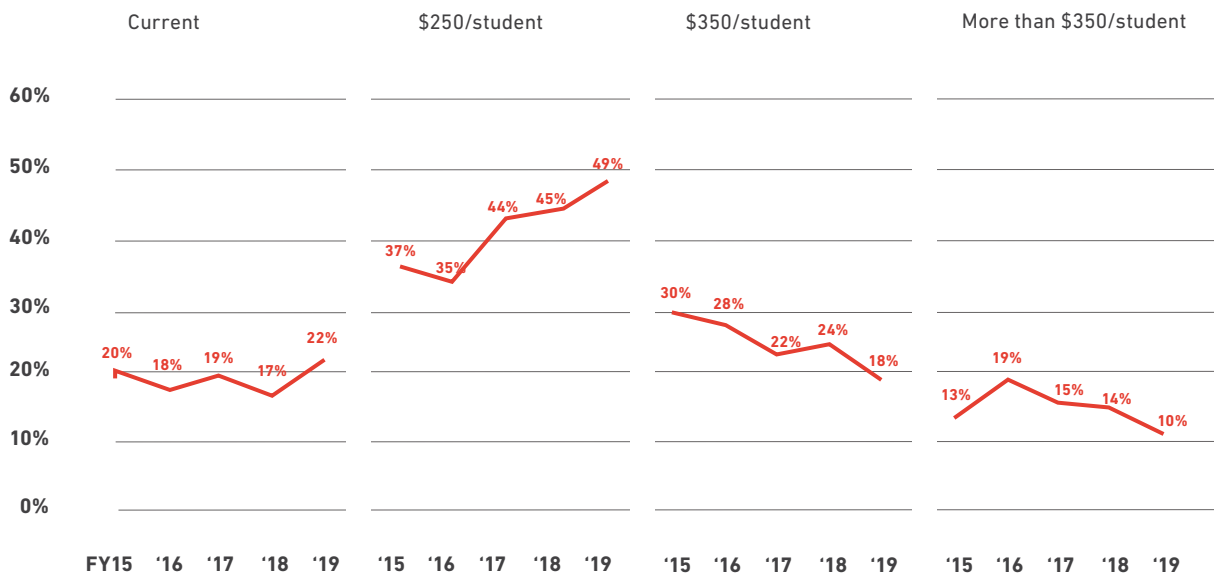
When will you need to upgrade your Wi-Fi?



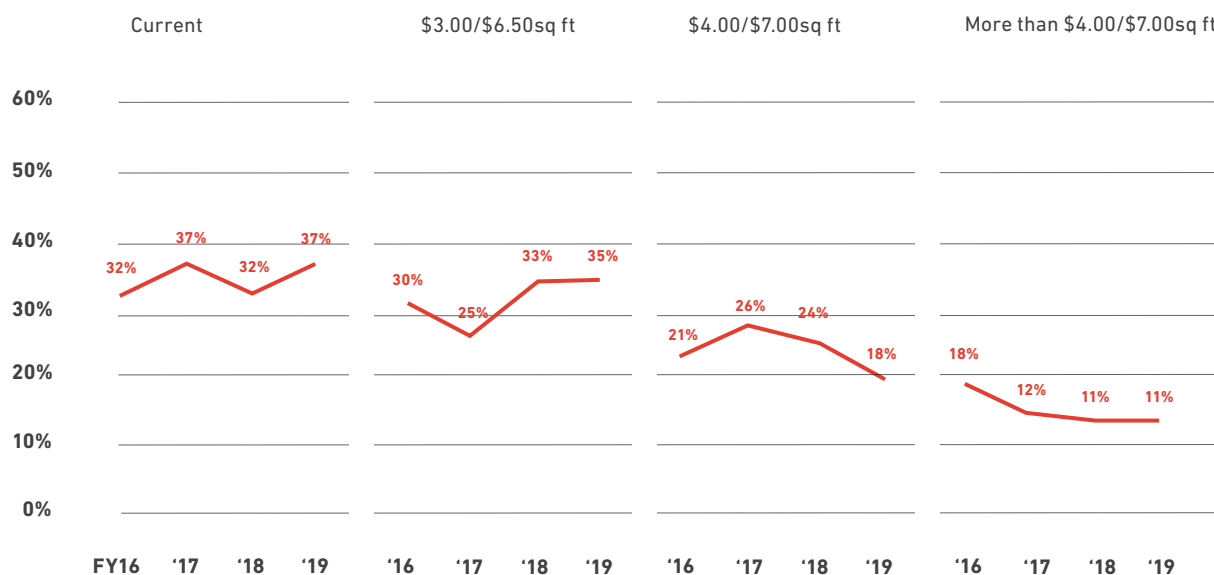
School and Library Networks

CATEGORY 2

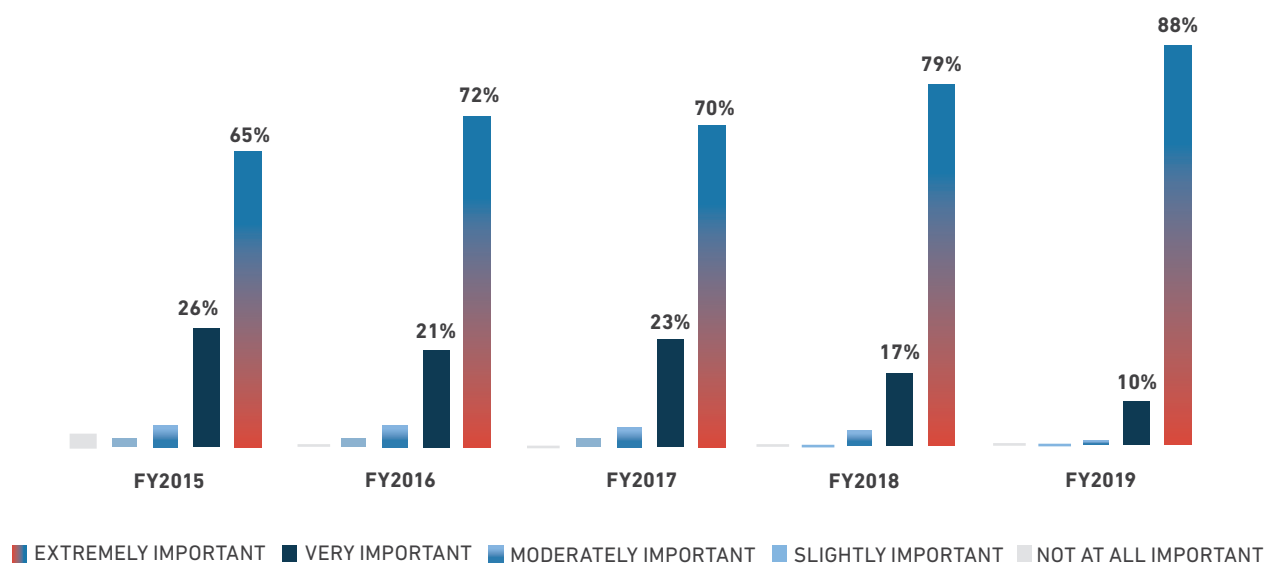
How much would you need to fully fund your Category 2 needs? (School)



How much would you need to fully fund your Category 2 needs? (Library)



How important is Wi-Fi to fulfilling your organization's mission?

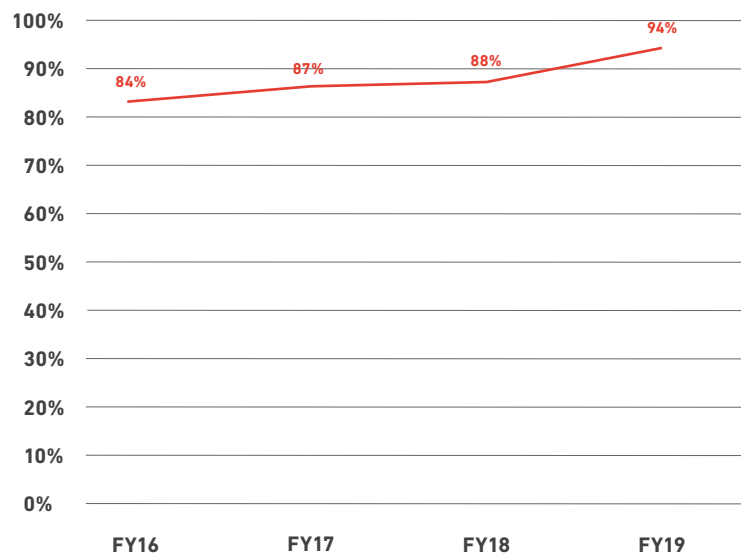


Surveyed applicants who support an applicant-level Category 2 budget rather than building-by-building

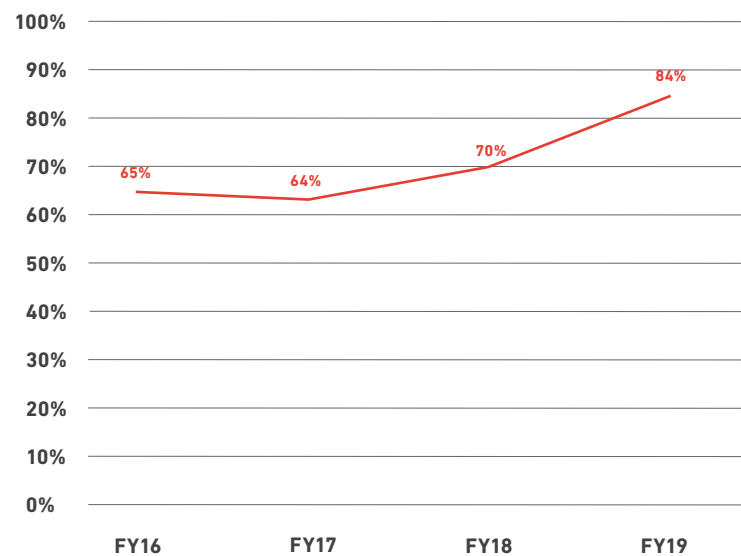


The E-rate Program

E-rate funding is vital to Internet connectivity goals.



Our organization can depend on E-rate funding every year.

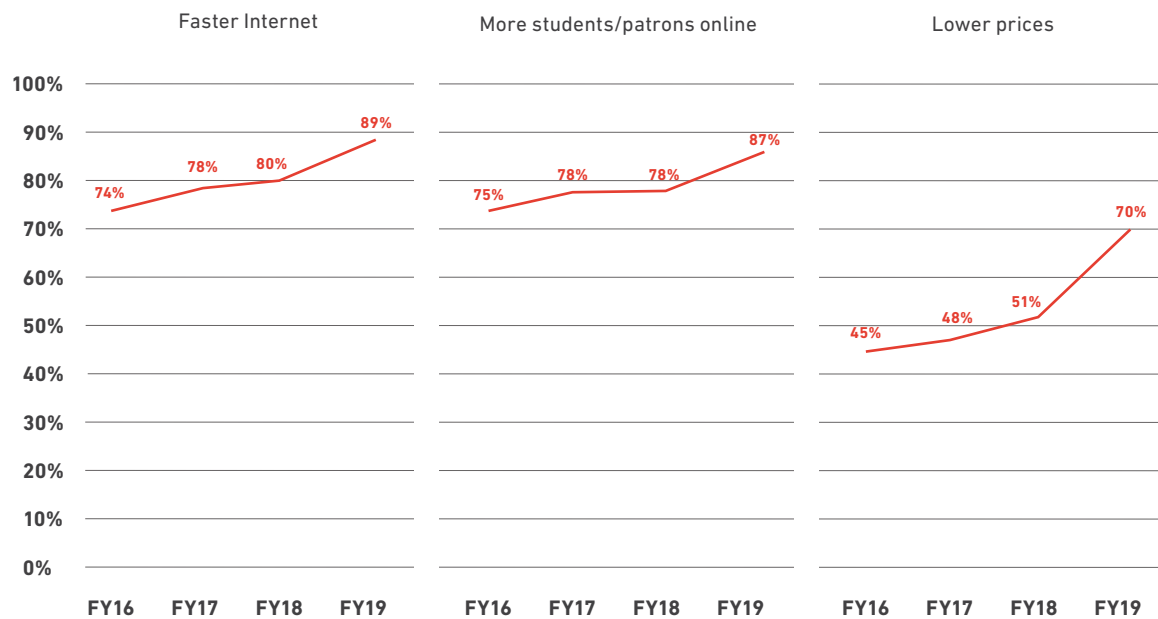




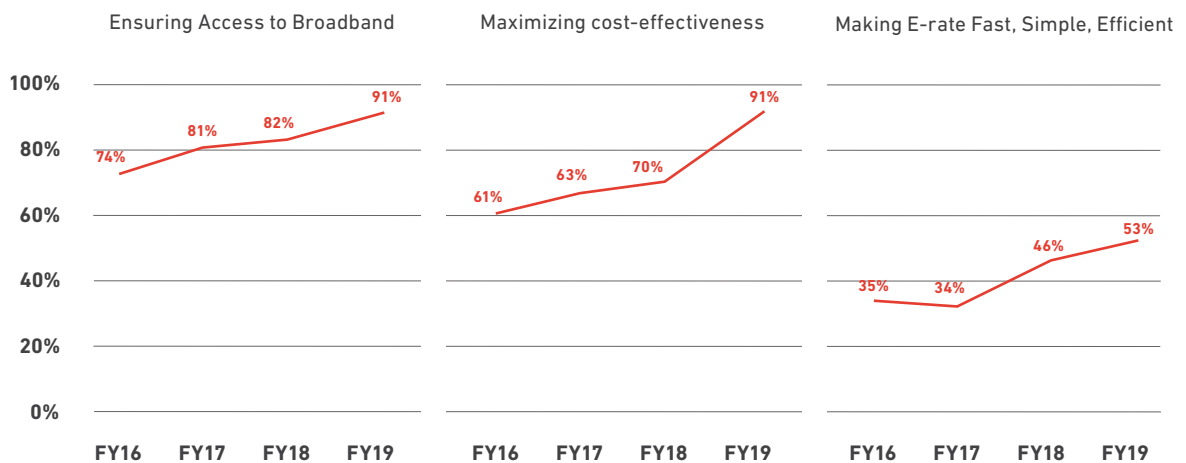


The E-rate Program

Measuring the Impact: Funding Years 2016 to 2019



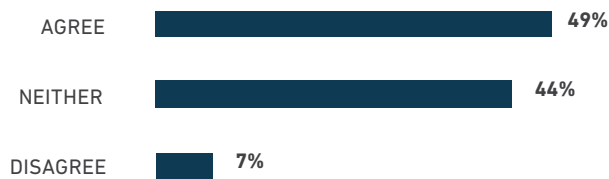
Assessing Performance based on the FCC's Goals for the Reformed E-rate Program



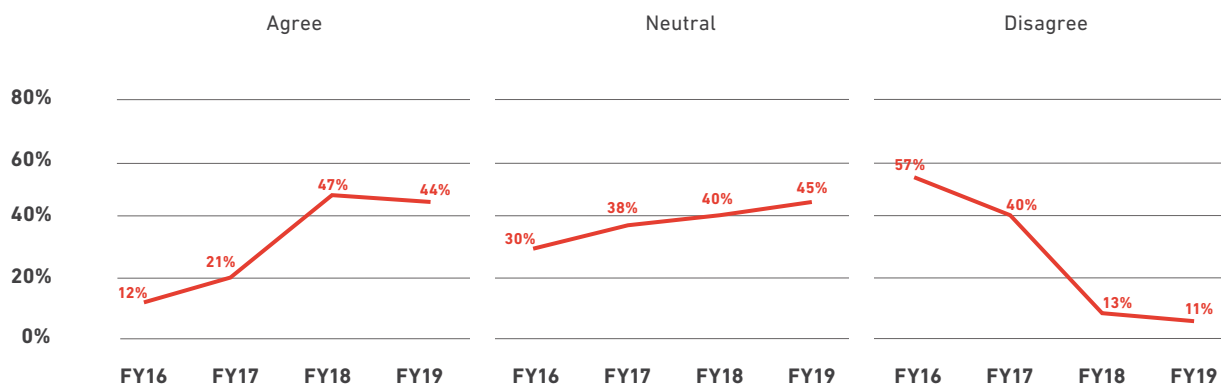
The E-rate Program

USAC

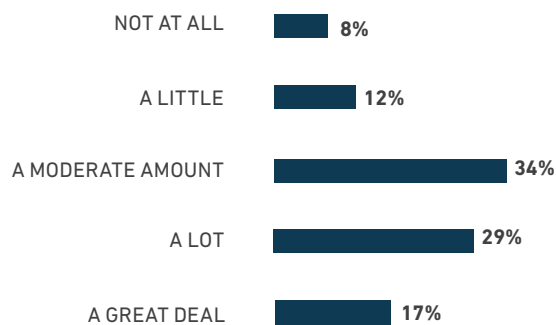
USAC should set a permanent date for the close of the Form 471 filing window.



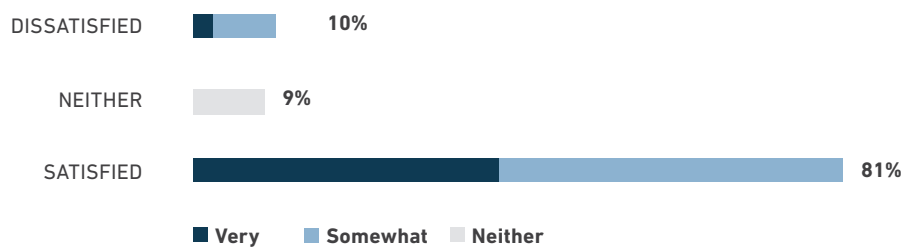
My FY2019 Form 471 application(s) took less time to prepare and file than in previous years.



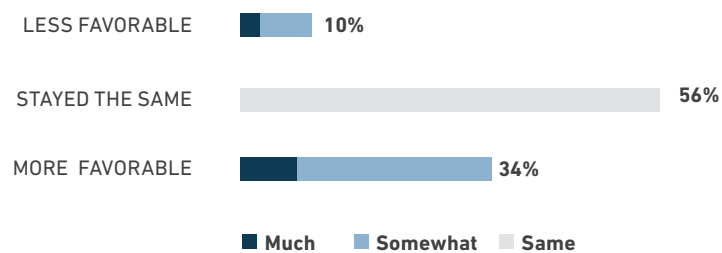
To what extent does USAC care about your individual situation?



How satisfied or dissatisfied are you with USAC?



How has your perception of the application process changed in the past 3 months?

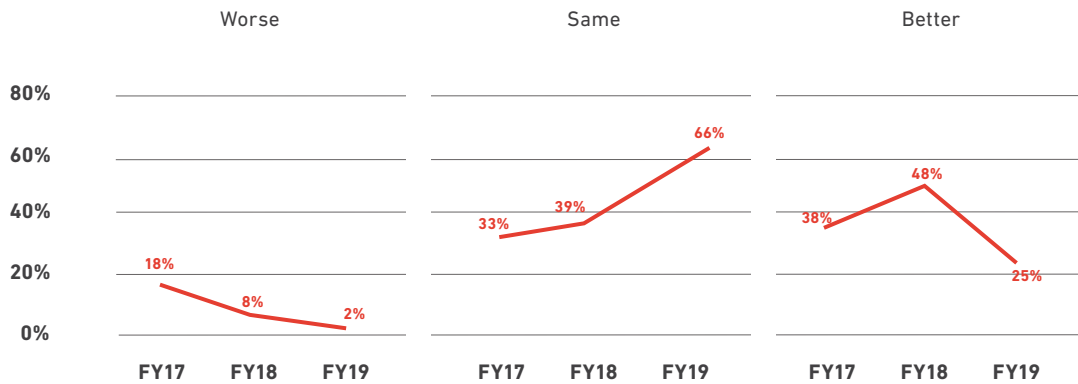




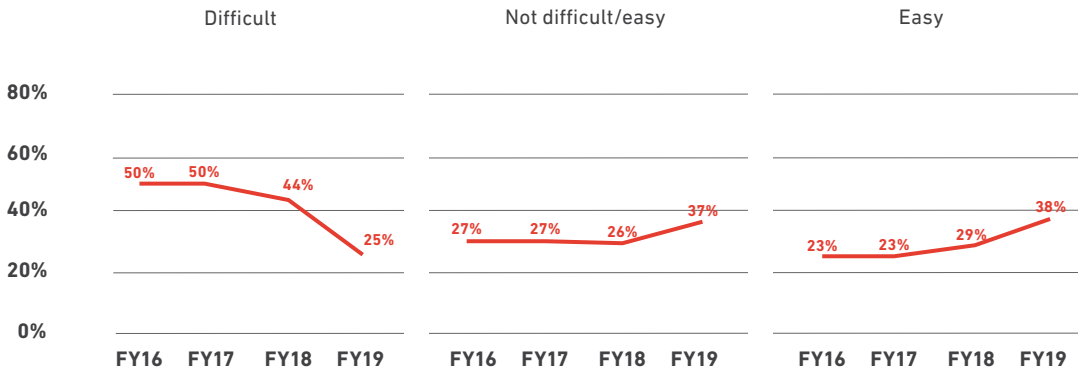
The E-rate Program

EPC

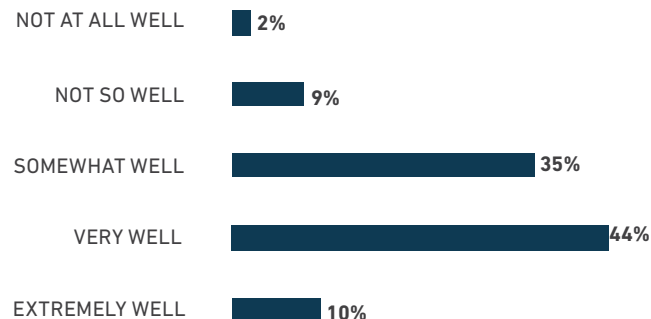
How would you describe using EPC this year compared to the last filing window?



How would you rate the EPC portal in terms of overall ease of use?



Overall, how well does the EPC portal meet your needs?



Open-Ended Responses

E-rate funding request data is publicly available and provides unique insight into the communications needs of schools and libraries. The data includes an applicant's name and location, their service provider(s), E-rate discount rate, and the category of goods and services being requested. Applications also include detailed line item information for each funding request. This include counts of lines and equipment, as well as the speed of connections and the model name of devices.



COMMENTS AND SUGGESTIONS ABOUT THE E-RATE PROGRAM, USAC, EPC, ETC.

1. I recommend a rolling 470 / 471 window to allow for alignment of E-rate with other broadband infrastructure initiatives such as the USDA-ReConnect program. - voice should only be eligible if delivered as bundled with network transport services and next gen 911 compliant. - Special construction of fiber (specifically middle mile) should only be eligible if there is at least one private partner sharing in the cost of the build to expand their service footprint to the edge of the school district.
2. The Library is also a member of LOGIN, a group of libraries who share their resources through a computerized bibliographic database. Residents with our Library cards can go and borrow materials from the twenty-three other libraries that belong to LOGIN, putting holds on materials using our online catalog access adds patron service value to all 24 libraries. Our Free Public Library computers are plentiful and loaded with software applications and Internet access to meet the needs of library users of all ages. Library users can sign-up for Book-A-Tech sessions and computer classes which include but are not limited to an introduction to computers, word processing, desktop publishing, e-mail, spreadsheet development, and navigating the Internet. From our web page you can search the library's catalog, browse the collection, put items on hold and download electronic reading materials. You can monitor and perform transactions to your library account. All you need is access to an on-line computer or mobile device and a library card. Library users can bring in a laptop or mobile device and connect and to the Internet through the library's wireless network. The Environmental Information Center is located within the library. The center provides environmental information in books, DVDs, specialized databases and periodicals. From their webpage patrons and members of the public can link to other Environmental sites. I have been able to participate in conference calls remotely to save time and money. E-rate, USAC, our FCC and Funds for Learning helps us get the job done. Thank you!
3. USAC PIA review and communication needs to be more timely
4. I need more information on this item: share Internet access off-campus, in your community, at no additional cost to the E-rate program. *District-wide funding, NOT campus funding with a cap of \$150/student. I could not fully complete my campuses and I had to leave funding on the table.
5. [1] Question 9 is misleading. USAC should set a permanent date for the OPEN of the Form 471 filing window, not for window close. [2] The USAC 471 review team needs to equalize the treatment of existing telco vs. non-telco WAN and Internet service. It is VERY apparent that USAC review prefers services delivered by big telcom providers over service provided by other carriers, even when the service provided by the non-telco is more cost-effective.
6. The review process for a fiber WAN is excruciating, unless you buy that service from a big telcom provider, in which case the review is simple. Why is it that no one ever asks how many strands of fiber Comcast has to build out to provision a service, and how many of those fibers are reserved specifically for the applicant? There is an obvious preference for big telcom providers, and an obvious preference for services that appear not to have up-front capital costs (even if those costs are extant by obfuscated in a fixed monthly cost). The preference should be for the most cost-effective service, period. If that results in new facilities being built where facilities already exist, if that's a problem, that fault lies with the existing provider's business structure, and the fund should not be penalized by having to pay only for incumbents, even when they are the most expensive choice. This weakens the public's perception of the fund, unless the perception you're shooting for is that you're in the pocket of big telcom.
6. 1) CIPA filtering should be E-rate eligible---currently it is an unfunded mandate. It would allow for substantially lower internet costs in many situations. 2) More than just one internet provider should be allowed for load balancing as well as for keeping the district running when a provider has a failure. As schools utilize online books and streaming coursework, loss of the internet is a critical issue. Redundancy is allowed in

- Rural Health Care, why not for educational purposes?
7. 1) Filing deadlines should be the same every year 2) EPC portal performance should be improved during filing deadlines. 3) Smart Net maintenance should be covered as equipment cannot be upgraded to the latest software releases without it. 4) EPC portal navigation could be improved.
 8. 1. Maximus contractors need in-depth program training. 2. USAC should provide a clear escalation process for customer service cases unresolved for more than 30 days (cases can remain opened six months to a year with no feedback). 3. Applicants should be able to file ALL forms for ALL funding years. 4. Applications should be reviewed and approved during the first semester of the funding year.
 9. 1. Pertaining to the bid process: We can't get fair competition on bids because manufacturers now register the first vendor and give them the best pricing. There is no way another vendor can get the product at the same price so it almost defeats the bidding process. Yes the bidding process does make the vendor realize we are getting multiple bids so they can't increase their price as much as they would if we weren't bidding. 2. Pertaining to cost allocation of Cat2 funds by instructional facility. I strongly believe the current funding model should be changed to an overall district funding per student instead of campus. We have smaller campuses and you still need the same equipment and connections as a larger campus to provide services to the campus. For example: I have less than 30 students at a campus but I still need a fiber connection, switches, wireless access points, etc. to provide equivalent services to this campus. The cat2 cost allocation for that campus will not cover the cost of the necessary equipment. 3. I am thankful for the funding and it is imperative that we continue to receive it.
 10. 1. The outsourcing of the program (customer service, PIA, invoice review, etc.) to a private company is a major problem. These folks have no long term stake in the program success. Give us some good old government employees! 2. Customer service tries to be helpful but you can't rely on anything they tell you. First tier support especially lacks in depth understanding of the program. If you want to "kind of rely" on help you have to submit a written request in EPC. That may or may not be more reliable. 3. There is massive inconsistency at USAC and their contracted reviewers about the eligibility of basic maintenance of internal connection services. 4. Services can be approved through the FCDL stage, including documentation sent to PIA, and then DENIED reimbursement when a Form 472 is submitted. THIS IS NOT RIGHT!
 11. 1. The USAC Service Department should make public their list of "ineligible" or "partially ineligible" C2 equipment for each Funding Year, including the reasons for ineligibility. 2. Modernize the eligibility of Firewall Appliances to match the increase of the need for higher network security which corresponds to increased bandwidth.
 12. 471 window should be eliminated. 471's should be accepted as long as there are funds available. (just like was intended when the program started) Consortia need to be encouraged, not penalized. 1) Consortia discounts are a mess. 2) Separate login for EPC by consortia lead (that also files for their own services) just shows how broken EPC really is. 3) Consortia applications get reviewed last, they should be first. Self provisioned fiber MUST remain eligible. In some cases the threat that an applicant will build their own network is the only thing that might cause in incumbent to actually provide high speed service. Redundant connections should be made eligible. Schools use lots of cloud services and require internet service in order to function.
 13. A brand new startup school or new added facility should be given top priority. I also believe this grant should have a second go around in the same year if you missed the first deadline.
 14. One concern I've noticed is that from the time a quote is generated to the time USAC approves the work to the time the equipment is ordered the price of the equipment has dropped or in some cases the equipment is no longer available and getting a 471 changed feels like an act of god with ridiculous time constraints.
 15. A district level C2 budget is absolutely necessary, especially for large districts where buildings open/close. The current rules are too restrictive to allow for needed equipment moves/changes as the needs of individual buildings change.
 16. A glossary of terms would be very helpful - especially when you first start. What is a BEN or a FRN? What is form 478 (what is it for - applying for funding, applying for reimbursement, etc? And simple instructions on how to delete and start over! (Trust me, the first year I had about 10 forms out there due to putting the wrong figures in the wrong place.....!)
 17. A huge yes for the 1 district budget vs school budgets. A huge yes on additional eligible cat 2 services such as content filtering and network monitoring and management. Ability to decide fiber capacity needs ourselves for self provisioned fiber. More Cat 2 funds. Better information communication during and timeliness of the appeal process. Especially FCC appeals.
 18. A large factor in the complication of the E-rate application process is the ever-changing dates, the last-minute release of eligible product and services lists and C2 budgets, CSB's slow response time and processing of Form 500's or

- others customer service cases. I am also finding reviewers are inquiring redundant documentation in PIA reviews such as already uploaded signed vendor contracts with pricing, already uploaded contracts for incumbent services in cases where applicants 470 didn't have bidders there for they awarded another year to current provider for C1 or asking for the bid matrix when there is the incumbent provider is awarded, which should alert the PIA reviewer there were no bidders, therefore, a bid matrix was not needed. I find we, being a consultant with many applications to process, are spending a significant amount of time answering redundant questions. I am a big advocate of districts having a lump sum C2 budget vs. separate budgets for each entity. It would greatly reduce complications in the application process for not only applicants but USAC as well by having one lump budget. Districts will have the ability to better impact the needed upgrades to some of their older buildings if they can utilize funding that would otherwise have been allocated to a new school, which has no/minimal need for upgrades. I also believe having one lump C2 budget would make it less burdensome to applicants when the FCC waits until the last hour to put out C2 budget totals. One lump budget takes much of the time-consuming work out of deciding what they can and can not E-rate based on their budget for each entity for allocation purposes.
19. Much easier application process and is simple to understand where you are in the process
 20. A secondary Internet connection is critical to our District's operation and we advocate for its addition to the ESL.
 21. Simpler application with less steps for libraries with no changes to their current services
 22. A single district-wide C2 budget rather than building-by-building C2 budgets would allow us to
- create a cost effective strategic refresh cycle.
23. A small school district should have a weighted formula so that it can compete with the larger school districts that get much more money for their needs. A small school that gets about 150.00 should get a larger amount per student to help equalize needs for students.
 24. Absolutely bring back funding for telecom services.
 25. Accessibility needs security on the network and should be part of the eligibility list. Building resilient Internet, connectivity, telephony services is essential to K-12 end-users and stakeholders.
 26. Add more network equipment for schools listing on Category 2
 27. Adding DDOS service and cyber security services to eligibility list.
 28. Additional eligible services: Servers, cloud backup subscriptions, security related hardware/software -cameras, recording devices, content filter
 29. After hours student connectivity is critical.
 30. Again, I think that your process is way too complicated and should be made to be more user friendly. I think that all services and equipment that pertain to Wi-Fi and Internet usage in schools and libraries should be part of the E-Rate program.
 31. All things should be covered that have something to offering services to broadband. Each area is different and there are many different ways to get broadband working.
 32. Allow filters to be eRate eligible to help meet CIPA requirements
 33. Allow for reimbursement of redundant power supplies in network equipment. Makes cost allocation simple if the whole device can be eligible vs needing separate lines for 1 included power supply and a second is not.
 34. Allow pre-K to be eligible even if the state doesn't fund pre-K. We have some federal and state grants for pre-K, and it is a huge pain for eRate because the state of Alaska does not fund pre-K as
- part of the mandatory education so pre-K is not eligible for eRate in the state of Alaska.
35. Allow redundant powersupplies in equipment. Allow redundant internet connections as long as they are through alternate providers to create redundancy.
 36. Amount of \$ we were to receive is not worth the effort
 37. An easier to use application process and add VOIP back to eligible services.
 38. Any task that I only do once a year is somewhat a challenge. Filing e-Rate forms are in this category. But the more continuity from year to year helps me catch up and be ready. The problem is when there are major changes, like the first year of the "new" Portal; that was a little tough. Thank you for providing the great customer support you have
 39. Approval needs to be quicker. Many if not all of cat 2 funding projects need to be completed during summer months
 40. As a private schools, and IMHO, we only apply because it is leaving funding on the table. I think that government funding gets abused by vendors, and ultimately a free market is better than rebates from the government. (I understand there may be a large number of schools that rely on e-rate funding. perhaps things should be shifted a bit towards those who need it most?)
 41. As a small rural school district, our options for Internet, Fiber, etc. are limited. eRate helps us tremendously with our Internet, building-to-building connectivity, and network equipment that are necessary in today's education environment. Since state funded programs such as PlanCon no longer exist, PA districts must spend more district money of projects. It would be difficult for our district to fund everything needed without the benefit of eRate.
 42. As a small school of 1000 students, we are negatively impacted by the budget caps to install all of the C2 hardware that

- we need for a robust, available network. Help with servers would make us even more effective and up-to-date.
43. As far as Cat 2 funding, I believe if there is a budget per student per 5 year term then the need for filing windows should be eliminated to allow for the planning and budgeting of items as needed. Usually by the time funding need is identified and products selected, submitted for approval and finally funded. Conditions may change and more updated equipment made available. I would much rather see lists of exact products and services listed as E-rate "Pre-Approved" that could be purchased from E-rate vendors at any time up to the funding level per 5 year term for the district in question.
 44. As I said the application process is way too difficult and not intuitive. Even after doing it a few times I still cannot remember how to do tasks. Why is everything given a code and a form number? Just the fact that they have a page of definitions goes to show that they make it more difficult than it has to be.
 45. As I stated earlier having completed E-rate for the past 20 years I would expect your services fall under the same response times as you expect us as applicants to go by. Having said that, I believe the program has taken great strides to minimize the amount of time spent to apply. I would also like to add that it would be very helpful to your organization to take advantage of the people like E-rate Coordinators to come up with helpful ideas. These people are in the ear of all applicants and possess great ideas for improvement.
 46. As initially instituted, the application process was too cumbersome for the benefit derived for my small library. Thankfully, our library cooperative took on the task of applying for all members and distributing awarded funds.
- Without the cooperative's help, the application process would have greatly reduced the benefit of the award.
47. As previously stated BEAR forms should be visible
 48. As someone doing it for the first time, I found the process to be rather stressful. There are things that seems like you have to do more than one time. We previously used an outside source for E-rate applications and would welcome that policy returning to our district.
 49. As with everyone, voice services should be eligible
 50. BEAR forms need to be included on the EPC.
 51. Because CIPA is a necessary component for internet safety for students, a provision for funding filtering systems would be beneficial, especially for the lower income schools.
 52. Because of our consultant it was and is an easy process.
 53. Because of the ever changing broadband needs and upgrades necessary to stay with current times, I wish E-rate was more flexible in contract upgrades. IE: allow schools/libraries to increase costs and USAC to approve as needed. For instance, we submit bid packet for what we "expect" to need, but 6 months later, needs have grown! Vendors also take advantage of that. IE: Vendor submits broadband rates based on 3 year contract, but if school takes lower usage, IE 500mg and 1 year later needs 1G, vendor wants to extend contract additional years and/or charge extreme rates. Very unfair to school and limits the ability to upgrade and stay within USAC's requirements. This happens when you are using a company that buys usage from the owner. If only 1 year left on contract, rate is out of control.
 54. Because we are a small library with only partial town funding, the e-rate program is a tremendous boon for us in keeping our costs down but being able to provide hi-speed Wi-Fi for our patrons.
 55. Being a small rural district, we would like to see an increase in Cat 2 funding or move network equipment to Cat 1. Replacing server, switches and Access Points can be very expensive and the current \$150 per student is not enough to cover. If this could be increased, we could replace and update this equipment every 5 years. Also removing telecommunication from Cat 1 has put a burden on our budget. It is very important to our district that all classrooms have either an intercom system or phones for communication to the main office.
 56. Bring back voice
 57. Budgeting for C2 for an entire District would be WAY better and more efficient than school by school. Small schools cannot get what they need. A switch costs the same at a big school as a small school. We are forced to either spend money we don't need at a big school or leave money on the table at a big school while a small school suffers. It also often costs more at older schools to provide the same level of access as at newer schools where infrastructure is built into the building (fewer distribution points, etc.). Let districts decide what is best! In today's model of accountability and demands for online testing, no school district can afford to waste funds or use them badly. Times have changed. Change with them.
 58. Bus access, new VoIP systems, phone service, and security solutions are going to be a need in every school over the next 5 years and beyond.
 59. C2 funds are often not utilized because applicants do not have funds for non-discount portion. Removal of support for voice services has caused a real hardship for most applicants.
 60. Campus based budgets do not make sense with the eligible services list. The eligible services list should also be expanded. Phones should be added back even if at a reduced rate.
 61. Category 1 and Category 2

- funding needs to stay in place to help schools purchase and upgrade equipment to keep up with technology demands.
62. Category 2 budgets should be for the district and not per school. We need more flexibility in how we use funds where needed the most and this lets us take into account where other district funds have been spent.
 63. Category 2 can be difficult. If it takes awhile to get your funding commitment, your equipment can become obsolete before you are ready to buy. Getting approval to substitute seems to take forever.
 64. Clearer instructions as to what things mean, the explanation of what one is requesting in layman terms. Maybe more drop down options with these explanations and what it helps achieve.
 65. Consideration to allow Cybersecurity related equipment and/or services eligible under the E-Rate program.
 66. Content Filtering is a huge cost to districts. It would help if this was included in eligible equipment
 67. Content filtering must become a covered service. It is mandated but not funded which makes no sense and is a burden to our libraries.
 68. Content filtering, which is required by e-rate, should be funded in Category 1.
 69. Continue to simplify the process and remove application barriers.
 70. I Could not believe how fast my app was approved this year. Great job!!
 71. Cover safety & security networking equipment.
 72. Critical to maintaining network services is the security of the network, which often comes as an additional expense. It would be beneficial to increase funding on security related products and services.
 73. Current Cat 2 Budget would be sufficient if funded at the district level instead of the school level. Need a better way to fund network equipment at the district level that all schools benefit from. If Security appliances like Filters were eligible and if VOIP
- were eligible, the cat 2 funding level would need to be a little higher like the 250 per student range.
74. Current fund level per student does not meet our districts needs. An increase per student would assist our district tremendously.
 75. Current program is headed in the right direction. Please do NOT bring back eligibility of POTS and other phone service. Far too much wasted money by organizations not updating to current technologies to save money and relying on E-Rate funds that should be used for broadband and modern initiatives. PLEASE allow for per district allocations instead of per building. Audit this heavily, if necessary. The problem with per building is that it does not always support the needs of the facility based on the student population. Using a district wide allocation will allow for ALL schools within a district to receive the equipment they need, regardless of head count.
 76. Currently the cost per student that is eligible hurts small rural communities when it comes to internal connections. When there is a limited access of services, it is also difficult when it comes time for maintenance. Travel cost start to become a factor when limited funding per student is available. The elimination of telephone is a concern to small communities that do not have the infrastructure to host multiple telecom vendors. This applies to internet services as well.
 77. Data security services and content filtering should be made eligible because they are necessary in school environments.
 78. DDoS attacks are becoming a big problem and a DDoS protection service needs to be allowed under e-rate.
 79. DDoS mitigation and High Speed Internet access have become completely inseparable. With 10gb of internet and moving to 15gb there are 3 major
- components required, high powered cipa content filtering, high powered firewalls and expensive DDoS mitigating.
80. DDoS Protection Services needs to be eligible. The self-provisioned fiber implementation is an issue because we aren't allowed to do any fiber that includes people outside of schools and libraries unless our state has tariff rates and ours does not. We can't do an install of fiber, unless we open the trench up to anyone who wants in the trench. This would also help drive down costs so that we could crowd-source non-E-rated expenses. Otherwise, it's impossible and we're stuck paying whatever the vendor quotes.
 81. District wide Cat 2 would be very helpful. Security systems would be nice to have as an eligible services. Simplify all the forms and steps. Do we really need all the forms? Better deadline notifications would be appreciated or have set dates for rather than after xx date and a means to extend or modify them. I missed a deadline date by 3 days because I was so busy with my actual job that I completely forgot about it. Zero notification about approaching deadline. Updated instructions would also be appreciated. Simplify the process. Simplify the process. There are too many rules, forms, and deadlines. The process is pretty simple. Request service, bid for service, apply for funds. Done.
 82. District wide funding would be very beneficial.
 83. Districts need a district-wide budget for Category 2.
 84. Do away with the bid process for small requests -- say any under \$25K. Especially in rural areas where there is usually only one bidder. Instead, move "certification" to the service providers. That is, let the individual service providers be okayed to offer services to anyone (below that dollar threshold).

85. Due to E-rate not paying for phone services we took a harder look at phone bills and found ways to massively lower our costs of phone service cutting our bills to about 15% of the cost they were before. I believe that everyone can get quality phone service for much cheaper if they look at places other than the large carriers. I also believe that the FCC or some other government organization should look at how absurd the costs are from the large carriers like ATT and push for change.
86. Eliminate the Category 2 subcategories from the filing process
87. End user devices should be eligible. Having the fastest network does nothing if you can't afford new computers.
88. EPC NEEDS TO BE FASTER DURING CRUNCH TIMES. FCC IS TAKING TOO LONG FOR SIMPLE APPEALS (OVER 8 MOS. FOR ERROR BY USAC)
89. E-rate discount is very important to our rural library as regards financial savings
90. E-Rate essential to provide internet service to our community.. Loss of funding for voice telephone hurt us financially.
91. E-rate funding is essential to this library. I would like the funding to increase, not decrease.
92. E-Rate funding is vital. We have more need now for MIBS than in the past. Allocation to district instead of per school would be very useful. Much simple USC entry, and we need the flexibility to meet the needs of lowest served schools.
93. E-rate funds are essential for us to serve our students and help them meet the expectations of our community and state.
94. E-rate Goal 2 is not as effective as it could be because PIA Reviewers request the same documentation for copy of already uploaded contracts, same questions for multiple year contracted services which had already been examined and funded in previous year.
95. E-Rate has allowed us to almost keep up with the data/bandwidth needs in our schools - allowing us to deploy an additional 20,000 student portable devices to students/classrooms.
96. E-Rate has been a very successful program, but one component that has begun to suffer again is Voice. I believe that E-Rate should not pay for Legacy Analog services, but I do think that they should help support districts making a transition to a modern VoIP service. Even if it wasn't the month to month bill but rather the initial cost to modernize their system. This could be a part of their Cat2 budget (for the system only), because it could also entail a change in PA/Intercom system and could ultimately help to augment the LAN itself. I also strongly support the idea of a dual internet connection. With the importance of testing to gaining funding dollars for schools, and now with more scrutiny of public schools any time testing can be put in jeopardy due to a poor connection creates stress on an already stressful situation. Finally, I would love to see E-Rate become more proactive in helping schools develop their own LTE network utilizing their own bandwidth and towers. Students need to be able to do home work at home and while libraries are a great alternative the reality is most parents do not have the time to drive their elementary student to the library so they can do their home work. These networks would be similar to building a dark fiber WAN because once the infrastructure is in place the internet connection (you already support) would light it and provide the connection. Thank you for all you do.
97. E-rate has been essential to our district in providing wifi for each classroom to support our Chromebook program. It allows students to prepare for testing and to test with their own device in a fast and effective manner.
98. E-rate is a important part of the IT budgets in many schools lessening this funds would detrimental in growth. Expansion is needed in approved CAT2 funding to include many items as listed on the survey.
99. E-Rate is a necessary and wonderful program - but it isn't perfect. I see improvements each year even though they always come with some issues. Having worked with multiple districts, I see the benefits and the drawbacks. Overall, in my opinion, I believe the FCC is guiding change and trying to improve this program - regardless of political agenda. The cap for C2 should be increased to meet the needs of infrastructure costs, and the PIA reviewers need to be well-trained to hold that job. There is far too much inconsistency among PIA decisions. Also, I find a serious lack of knowledge sometimes when dealing with PIA and especially the CSB help line. More training for Applicants is great. Now more training for USAC workers as well.
100. E-rate is a necessity for our fast growing school system. We build about 2 schools per year and the e-rate funding is needed to implement a network sufficient for the learning of our students.
101. E-rate is a wonderful program that allows us to have the wi-fi and internet connections at our school that we otherwise would not be able to afford. However, while the cost to us is less expensive to use e-rate (once the discount is figured in) the overall costs are more to use e-rate due to the legwork involved by all parties.
102. E-rate is an important funding stream in our district, unfortunately it is small because we are a small rural district with less than 500 students. Basic infrastructure has a fixed cost regardless of how many or few students are enrolled and it's unfortunate that there isn't a way to fund that fixed infrastructure the same as districts with more students.

103. E-rate is essential to the core value of rural public libraries. There is no way we could afford to close the digital divide without this program. Thank you!
104. E-rate is vital to our school's success. Thank you!
105. E-Rate knowledgeable 471 reviewers.
106. E-Rate should absolutely support mobile internet access such as hotspots that can be used in student homes. If we had funding for these we could purchase many more for our students and families.
107. E-Rate should fund VOIP services. In our rural areas, we do not have cellular service so not having a way to communicate, especially during an emergency is a serious issue. Telecommunications/ VOIP service costs are very detrimental to our schools' budgets. If E-Rate would fund at least VOIP services, schools could use the money currently going to voice services for student instruction and other student services.
108. E-rate support has provided a high percentage, of the cost, to provide efficient technical equipment, and services, to our district.
109. Errors found in the bidding process aren't looked at as intended if it didn't change the outcome. The process isn't looked at holistically. "Was the intent and outcome of the bidding process preserved?"
110. Evaluating bid process is WAY TO COMPLICATED especially if you are requesting less than \$20,000 in funding. I know you have to have fair bid evaluations, but there must be an easier way to accomplish this task for districts that are requesting less than \$20,000 in funding.
111. Even with significant support from USAC, our current village connectivity in Alaska is way less than adequate in providing for the needs of a robust internet. With broadband connections within a school in a range between 10 to 18 Mbps, there are many issues that arise and student achievement suffers as a result.
112. Every school should be provided with the fastest internet possible at no charge.
113. Excessive Appeal times for both FCC And USAC. Excessive wait times for prior funding year FCC Form 471 to be approved. FCC Form 500 is time consuming and cumbersome. Maximus reviewers unavailable via phone or email.
114. Explore why federal funds are being given to carriers to build fiber networks, but the same carriers refuse to bid on E-Rate project. Are they fat and happy or stupid?
115. FCC-USAC's lack of a timely due-diligence process on funding holds provider and consortium in limbo for as long as they wish. Uncertainty causes increased costs and poorer performance.
116. Filtering needs to be covered.
117. Filtering solutions - a stipulation of being CIPA compliant should be 100% eligible. Any licensing, extended warranty and support of eligible equipment should be 100% eligible. Network security is of the utmost importance to schools, anything needed to keep viruses (etc) out should be eligible. Bad guys are getting smarter and we need to stay ahead of them.
118. For a very small, poor district, it would be helpful to be able to use E-rate funding for technical support and for E-Rate assistance in managing the processes.
119. For C2 equipment and services the time frame for application is never at the right time. For this one application, I suggest no closing date.
120. For C2, the per-building sq.ft. does not account for the order of magnitude difference in needs between our smallest and largest branches. We would much prefer a system-wide calculation.
121. For small rural schools, the set rate per student is not even close to being sufficient. Additionally, small, rural schools have even more need for support, including adding back servers, telephone funding and including VoIP funding. We all need telephones. This is not a service that will just go away. In the past, ERATE helped our district tremendously when it funded telephone service, DNS & DHCP servers and during that time, the funding was higher which allowed us to have a sufficient network backbone.
122. For small single location schools for the disabled with small classroom sizes of no more than 6 students the per student ration budget system is a total failure. Special budget guidelines should be developed. Use per class room budget numbers in stead of per student
123. Forms have become easier to submit, but the training webinars have been very helpful to know how to use the site.
124. Fund web filtering appliances, software and updates to the extent needed to meet CIPA.
125. Funding for Mobile hotspots for students away from school sites is needed.
126. Funding ltrs were returned in a very reasonable time.
127. Funding request - Network Camera Security Systems. Funding request - Voip Telephone systems and hardware. Funding request - CIP Trunks. Funding Request - Community WiFi Hotspots filtered by the School District.
128. Funds for Learning provides excellent customer service and quick responses. I am grateful for all their help and support.
129. Get rid of it and fund the schools directly. The money is the only reason I continue to use it. Timelines are terrible and funding is extremely slow. Once you are funded EPC looks for ways to take it back. We have yet in the 5 years I've been doing it to ever have it go smoothly. To many people putting hurdles in the way and trying to control how you use the money when we as Tech Directors know best. Personally I hate the program and wish it didn't exist. Money is the only reason why I deal with it.

- Classic case of when government gets involved they screw it up. But the part that keeps it alive is the money which schools desperately need. Fix the issues and it could be great program.
130. Giving school districts the flexibility of using funds across the district instead of allocating funds to specific schools would be extremely helpful for school districts.
131. Great program that can be better. If goods and services are mandated to meet E-rate requirements, they should be eligible. i.e. CIPA filtering
132. Hardware ages, and needs to be updated and replaced. Desktops, chromebooks, tablets, etc. should be eligible for funding.
133. Have had issues trying to get responses to questions especially after submitting invoices. Have tried both calling and submitting request through EPC. Most of the time when calling, they can't provide enough information and I don't get feedback after the call in a timely manner. Shouldn't take so long to resolve issues...meaning months.
134. I am 100% pleased thank you very much!
135. I am extremely frustrated with CSB. When I resort to opening a case, it is because I have a question that is not readily answered in the available documentation. It is infuriating when the response is a copy and paste of the information I've already looked at. Anything out of the ordinary gets pushed to "case management" where it sits for weeks, if not months. This year I had PIA review requests to verify school lunch data, even though my organization is a library. The PIA process for fiber special construction is absolutely ludicrous for small projects. There should be a waiver if the cost per foot or total cost is below a certain threshold.
136. I am grateful for the E-Rate program and the discounts provided.
137. I am new at E-rate and this has been a learning curve for me to get use to. I have been able to save our district some money through E-rate. This has been a good program for our district.
138. I am sorry for such a negative report but I found the process to be quite complicated for our small Rural Library and I gave up even using it for the last 5 or more years
139. I am still not understanding why when firewalls are eligible, I was not granted funds for mine back in 2016. I continually have been denied for funding despite having my paperwork completed accurately. The appeal was also unsuccessful but when I ask USAC tells me "it's not eligible". Again, firewalls are eligible so this was a very frustrating process that dragged out for years.
140. I appreciate the 5 year cycle started in 2015. It is a challenge at times for a district to match the required funds (40% for this district). Plans need to be easier for a multi-year project - like self healing fiber lines.
141. I appreciate the efforts you have made to improve the experience.
142. I appreciate the opportunity to provide feedback. E-rate is essential for our urban district that would otherwise be years behind the corporate world of technology if we needed to pay 100% of our Internet, WAN and infrastructure. In a time when we need schools to produce skilled young professionals to support our cloud-driven corporate economy, we cannot afford to have schools unable to pay for cloud connectivity. E-rate Cat 2 funding last year helped our district to get out of the Wi-Fi stone age and our schools are doing things online this year they could not have imagined last year. As I heard it said recently, teachers and students won't complain too much if the room is too hot or too cold but when the Wi-Fi goes out, the tools used for education in classrooms mostly unavailable. Thank you,
143. I believe having one budget for all of our locations will allow us to adequately support all buildings and meet our needs for less money. Our largest high school receives more possible allocation for CAT2 than we can spend, however, I have elementary schools with low enrollment that we exceeded our total available budget with one project.
144. I believe popular brands such as Cisco, HP and Aruba have greatly increased in price because of the way bidding is done. Less well know hardware solutions are sometimes almost as good at a fraction of the cost. I don't know how to address the problem, I just know buying replacement items on off years is much less expensive.
145. I believe that filtering should be eligible as it is required (as it should be) but not funded.
146. I believe that funding should be at a district level with the appropriate accountability. Additionally, E-rate funding review process could be altered to so that the reviewers are specific with their questions and also are reachable in the event a district is struggling to understand the reviewers questions. Tennessee is struggling to establish a proper testing vendor and system. The cost push for online testing and influx of technology in schools has dramatically increased the need for increased bandwidth and network security. Several districts around the state and country are transitioning to a wireless infrastructure that has insufficient security resources available because of the cost associated with them. An example is a Network Access Control system that can ensure the network remains secure via user and device based policies. There are several resources that would be extremely helpful to increase or maintain the security of our school networks and student data.
147. I cannot stress enough that Category 2 funding be put back at the district level. We had a brand new school receive more funding

- than a much older school that badly needed to be upgraded. Districts know their needs better than USAC. This model should never have been implemented. It also makes tracking Category 2 funding and expenditures a nightmare, especially since the Category 2 Budget Lookup Tool is useless due to lacking 2015 data. The document retention requirements are too stringent and an administrative burden. While it makes sense to keep records, it should not be necessary to retain paper at the granular level required by the E-Rate Program. Timely turnaround for funding commitments continues to be an issue. Applicants are basically left in limbo for an extended period on whether or not they will receive funding, making it difficult to plan and schedule work, and the only information EPC has to offer is that the application has been "Certified." This also applies to PIA review. I never receive confirmation that requested information/documentation has been received.
148. I completely support the idea of district wide funding over school by school
149. I do feel that the process has become "better" than it was years ago, and certainly approvals have come much faster over the last 10 years. I do think, however, that EPC still needs some work on overall site navigation in an effort to become more user friendly.
150. I do not think that we should keep records for 10 years. Five year was still the best. The reason I use a consultant was that the program because so much harder to deal with after 2014.
151. I don't know what we'd do without the break on wifi funding. Our wifi usage increased 30% just last year. We will need to upgrade soon. However, the filing is so complicated that we have to pay someone to do it for us.
152. I don't think we should be including voice services, phones, etc. However, the FCC/USAC should not require applicants to cost allocate switch ports that are on an eligible switch but used for VOIP, security cameras, access control, etc. This is very costly for districts to calculate and hard to maintain compliance as network needs change. Under category 2 switching for any purpose should be covered.
153. I feel like the PIA reviewers ask for information that is already in the system and should be more relaxed in their reviews.
154. I feel that at least partial reimbursement for fail over or secondary internet access would be useful. In light of all the online testing that children are required to do even a reduced level of coverage for backup internet would be extremely beneficial.
155. I feel that software that runs on firewalls such as threat protect, IPS, etc, should be eligible. We live in a time where "basic" firewall services can't protect us anymore. We need these extra services/software in order to achieve "next gen" firewall protection.
156. I feel that the E-rate program is really great but I wasn't able to use all my funds that I had left simply because of the restrictions on what we can use the funds for. I would buy more UPS backups but we aren't allowed to use those for servers so I have to pay for those myself which are expensive. To be honest I think we should be able to use it for the purchase of servers also. If I pulled my servers out my network doesn't function but the only server we can use E-rate funds for is a cache server and we just aren't big enough to require one of those. I fully support the use of E-rate funds for network security and I think some form of Anti-virus/Anti-malware would also be a good edition considering how schools are getting hit with malware & viruses. Many schools just can't afford it or think they can't afford it.
157. I feel that web filtering technology should be eligible.
158. I feel the process could still be simplified with less nit-picking of irrelevant details like SKU numbers on purchased equipment. Make/model should be sufficient.
159. I found the category two funding to be grossly unfair to our district as we were unable to use a lot of the funding. We had already put in fiber between all of our buildings, we had just put in a wifi network, access points, new switches, etc. We had to build a new building and used our own funding to provide for it because I was told that our "planning phases" weren't in alignment with the erate funding cycles, so we were unable to use our cat2 funding for those costs. It seems like if we already have a fully functional network in place, we should have been able to get our money for that back or use it for something else that we do need. And there are too many hoops that you have to jump through to get things approved.
160. I had my 470 form kicked back to me (my error of omission in something). I was unaware that the 471 deadline was a set date. After my 28-day period was complete, I finished my 471 that following week, but the date was passed by a day or two. . .and now I'm locked out for a whole year???
161. I HATE IT! We are a very small library---there is no way I should have to have a consultant to be able to understand what is happening---I should not have a USAC person calling me for reports from five years ago--they are so behind. I have panic attacks everytime I see their emails! I will never file again, I can't even explain the horrible treatment from that company!
162. I have applied for network switches in the past only to be denied. I find the process really difficult and I'm very apprehensive to purchase any equipment and expect ERate funding, therefore I only apply for internet connections. I do not understand why certain items

- were denied. I think the process is really difficult to understand and it's really stressful to sign off on without a mistake.
163. I have called numerous time for assistant filling out my forms and always receive profession assistance. I have recommended to others to call if they need help
164. I have handled our library's application for the entire life of the e-rate program. The website makes it easier and quicker to complete the forms.
165. I have heard comments that e-rate funding will not available after this 5 year window has closed. I don't know how we will survive without this funding.
166. I have some concerns about endpoints that should be allowed to be plugged into ERATE equipment. We should not have to supply locally funded switches to support our locally funded equipment such as IP security cameras, locally funded VOIP phone environment, HVAC, security/fire alarms, door access control, etc. All of this stuff requires network access these days. I understand the reasoning to be that these types of thing are not considered instructional. I would argue that by saying that everyone one of these impacts instruction and the learning process. Schools are a sanctuary for a lot of children. Security cameras, security systems, door access control, VOIP phones all contribute to a safe and secure learning environment. Further, our VOIP phones offer communication between the classroom and all types of services. This is also another layer of security and safety. Our VOIP phones/systems are locally funded and there's no cost to ERATE. The same goes for HVAC systems. Beyond that, a lot of these systems are supported by contracted vendors. If one of those vendors currently plugs their equipment into the wrong switch, we would be in violation and our funding would be at risk. These vendors no nothing about ERATE, so they would have
- no idea they even did anything wrong. I really would like USAC to take a hard look at this. No one is trying to overinflate cost, but we want to make the case that all of these systems are necessary to make a school function in the modern era and no school or library should lose their funding because something was plugged in wrong. I appreciate what ERATE funding does for our schools, but we really need some flexibility on this. I shouldn't have to lose sleep over things that could be out of our control and that should be allowed in the first place.
167. I have wondered why web filtering is required to meet CIPA compliance, which is necessary to utilize E-rate funding, but the costs are not supported by the E-rate program.
168. I hope that the program continues with increase funding per student for both C1 and C2 programs.
169. I just want to reiterate my support for reinstating E-rate funding for VoIP service.
170. I like the changes made to the system that entities with less than 80% get some money to spend on category 2 purchases.
171. I like the idea of one C2 budget for the district. I would also like to see the other services mentioned in your survey offered, internet at home, security services, VoIP. Once a district proves that it has satisfied the goals of the E-rate program the district should be able to seek reimbursement on other services.
172. I love the program. erate is instrumental in building an overall robust network and we wouldn't be where we are without it!
173. I recommended that have a chat support 24/7, this tool is very important and when we have problems is more easy and fast to solve problems or answer questions. The form or support in spanish is very important also
174. I represent more than 90 rural districts in West Texas. Most have fewer than 500 students K-12. 125 students x \$156 is
- roughly \$18,500 - that will hardly buy district switches and access points!
175. I think IP security camera systems that run over your network should be funded.
176. I think overall my biggest complaint is that a system that requires many districts to hire an outside consultant to apply for funding is overly complicated and is an issue. This is my first year doing this and the previous person in my job has had to come help me in order to get this figured out, and it isn't even over.
177. I think that a lot of things are being marketed as services managed by outside companies because E-Rate has been paying for it that way, when in reality most of these services that have been proposed to me are way overpriced compared to having paid for and owned the equipment. But then again, I'm a very small school and may not really understand the needs of larger or multi-site issues.
178. I think that internet filtering products should be E-Rate eligible for Category 2. The hardware and the annual maintenance. It is absolutely necessary to keep our kids safe and the products that do the job correctly and handle encryption are very expensive.
179. I think that mobile hotspots should be eligible for erate discounts since they provide internet access for offsite events and also are used for a failover/ backup connection in libraries.
180. I think the E-rate program as it's now designed is more equitable to schools then it used to be. E-rate ending many of the services that it used to support was painful but I think the right thing to do. E-rate is back to its core mission to provide internet access to classrooms. Strongly encourage the dual provider access. Both for the additional bandwidth and many times has one or the other network gone down! Internet connectivity is now an essential part of everything we do. Going

- down has a major impact. Keep the dual access - This is issue number 1.
181. I think the one MAJOR item that is left out of E-rate funding is advanced firewall and filtering for students. Also the self harm services would also be beneficial.
182. I think the program is providing a service that would not be able to afford and offer to our students otherwise.
183. I think there is a host of useful technologies in Cat 2 that should be available. I also think that for some things, that being able to demonstrate that open market is cheaper than some of the bids would be helpful. I think provisioning for emergency equipment: ie cases of natural disaster recovery, would be good.
184. I use a consultant so some of the questions are not applicable to me.
185. I wanna thank USAC, I would not be able to meet district goals and visions without the funding that is provided. It is a great program and I am really happy that I have it.
186. I was disappointed when they dropped telecommunications (phone service) we needed the help.
187. I wish it would go away and we could just have fair, competitive pricing from providers without all the red tap and rigmarole.
188. I wish VOIP wasn't excluded from the eligible products and services for the E-Rate program. VOIP for our school is very expensive and now we're having to pay for our phone service out of pocket. This is an integral communication service that is needed at every school! I also didn't like the fact that our discounts for internet are reducing. This should be a permanent service for all schools and libraries. Internet is a vital aspect of schools today.
189. I would first like to say I'm grateful for the E-Rate program. I've been involved in the application process in every year but YR1 and always been able to receive the funding I applied for.
- Unfortunately, not everyone has my experience and the difficulty level of applying has gotten out of hand. Over the years, I've taken on contract work for a number of small rural school districts in CA that would have no clue how to do the application process. Because it's so complex, I've heard from vendors that many schools they work with aren't even applying. Others aren't being funded that should be because of the complexity of the process. In addition, with billions of dollars in unspent funds, the FCC needs to increase the dollar amount per student and also give districts the flexibility to spend it on any entity they need to versus restricting dollars to individual entities. I also believe funding for telecommunication services needs to be restored. It's a hardship for a number of schools. Thank you for your consideration.
190. I would like to request the reinstatement of full funding of eligible voice services. Our library requires voice services on a daily basis for the safety and service to staff and patrons. Living in a low income, rural community, E-rate supports aid in the cost of our internet bills. If we were able to receive funding to assist with voice services again we would then be able to use those funds to provide additional services to our patrons. Thank you.
191. I would like to see filtering provided through E-rate funding.
192. I would like to see funding to protect what equipment we are buying through ERate. Investing in cyber security for K12 should be just as important than the services and devices that is covered.
193. I would like to see the return of coverage for Servers - a necessary part of network infrastructure. Plus filtering costs, we must be CIPA compliant but USAC does not cover filtering costs.
194. I would like WI-fi hotspots for loan to qualified students to be eligible
195. I would love to see E-rate cover all phone bills for every district. Just pay the phone companies direct. What a blessing that would be to every district, making life easier.
196. I would suggest that since CIPA requirements have to be met in order to qualify for E-rate funding, then those appliances and/or services to meet those requirements should also be funded.
197. I'm amazed at how well the program is managed. I believe voice should be eligible.
198. If an obvious mistake is made in the 470 the form should catch it and you should be able to fix it. regarding the monies per each student in Cat 2 it should be the amount that you can recoup from E-rate not the total amount you spend.
199. If it weren't for the E-rate program there's no way our library could provide 100 mps of internet and wi-fi service to our patrons. We appreciate the funding we receive from E-rate. Our rural library would be crippled without it.
200. If nothing has changed from the previous year we filled out the application why can't we just mark no changes from the previous year instead of doing the application every year with no changes!!!!
201. If the applicant goes over the budget, as long as everything is eligible then just cap it and no adjustments to cost need to be made. This would simplify things immensely. That way we wouldn't have to worry about what budget amount is left, etc. Makes little sense to have to adjust individual cost to meet the budget. Just make it a done deal- you will be funded to this max amount. No adjustments need to be made.
202. If you are going to make it eligible to share internet with the community, you need to make all the equipment to provide said access E-rate eligible and it wouldn't be feasible by student count in figuring out how much

- budget you would need. It should case by case and not a standard amount like Cat 2 funding.
203. I'm hopeful that the new USAC contractor will be trained to provide meaningful responses to questions. I've already searched the SLD website for the answer and couldn't find it, else i would not be calling help desk; so, regurgitating the web reference is not helpful.
204. In all honesty, using private and state-supported e-rate consultants vs the USAC is the only way we could participate in the e-rate program. It's much too complicated for a single school district to deal with and meet all of the application requirements. Additionally, since our state matched e-rate funds, it solidified our commitment to use e-rate funds. Otherwise, we may have just opted for a multi-year funding plan.
205. In general, we are very happy with the E-rate program and USAC. It would be nice to have a little more flexibility to correct errors from the user end however. I accidentally failed to change service type for a line entry on a Form 471 and opted to not go through the hassle of everything required to fix because the open window time frame had closed.
206. In many cases, we would be able to keep our costs even lower if the category 2 program would allow us to purchase directly from unapproved vendors like Amazon, Monoprice, etc. and get reimbursed through BEAR rather than having to work through 3rd party vendors who often don't carry the mix of products and brands that we really want to purchase.
207. In order to achieve "always on" for classroom learning, redundancy/backup solutions are a must. Needs to be included in E-rate funding.
208. In the past you sometimes did not receive approval for over a year. hard to plan. has been better lately
209. Inflation rate should come out earlier not at the last minute.
210. Instructions for applying need to be clearer as to categorization. Our application was approved and had even been looked at by our state e-rate coordinator and had her blessing. Then when the provider requested the funds they were told they weren't allowed. This didn't make sense to me because if it was approved on the application it should have been approved for funding when the request was submitted. We weren't told by the provider that there was a problem until after the date passed for filing for an extension so we were just 'out' the money that we had counted on in our budget for the project. This was our first time filing so it gave us a really bad feeling about the entire process. We are a small school with very limited capital outlay assets so this hurt us and we would be worried about applying for a big project and this happening again. If we had not had the approval of the project we may not have done it. We went into it knowing we had the approval and then we didn't get half of the funding. We were told that until the USAC approves the funding request they can back out of the funding. That seems a bit unfair to us. We get notice that the funding is approved and we complete the project and they can back out of the funding commitment at the last minute after the money is already spent? Leaves us in a bind with our budget.
211. Internet access for the community would be great as decent internet (ability to have more than one device accessing the internet) in some areas is non-existent. Our district covers a large area if it were to cover everyone.
212. Internet is so critical for daily student learning today such that a single provider is too risky. We have two providers to ensure reliability but only get E-rate for one of them due to antiquated E-rate rules. I presume FCC commissioners don't understand the need for reliable internet in today's environment. I bet if their children were studying online for a test and the internet went down at home, they would be upset. Multiply that by 40,000 students and over 5,000 staff.
213. Internet service for the last mile should not be overlooked.
214. Invoice review processed has slowed to a CRAWL with the new company that reviews invoicing. This needs to improve drastically for reimbursements.
215. It appears that E-rate needs to expand what it allows schools to utilize the program for.
216. It has been a good program and we really appreciate it!!
217. It has been a hardship for our district to use the local budget to fund our VOIP Phone Service and POTS Phone Service. Please allow these items to be eligible for erate funding.
218. It is a tremendous program that is necessary for the instructional benefit of all students and educators across the United States. Without it, these individuals would suffer immensely and potentially cause our nation a huge disadvantage when it comes to 21st century skills.
219. It is an underutilized source of funds by many small, rural libraries due to the complexity of filing. It is better than it was, but unless a system files for the libraries, most don't bother anymore.
220. It is bizarre to me that Erate requires a filter, yet the cost of the filter is not eligible for erate. The cost of the filter can almost entirely offset the savings of the program, making the program moot.
221. It is clear in the USAC-led trainings that the desire to simplify the process is there; it's the how-to's where the struggle comes in. It may be helpful for some top level USAC personnel to meet with a representation of participating entities and actually see for themselves what we go through and discuss how changes can be made.

- Secondly, the FCC appeal process could use some help—there are appeals waiting that are a couple years old.
222. It isn't the 'option' of self provisioned that is beneficial it is allowing districts that already have a contract for self provisioned to leverage erate money for that network. Some districts purchased their own and then found out USAC changed the rules and could apply but you can't when you are already down that road. Getting a budget for Cat2 doesn't really help because you have to have money in order to use that budget. Just give people the money with out having all the strings. Competitive bidding is a hindrance and the providers are out there making it difficult for schools to do a applicant owned network. They have way to big of lobbying resources....which they got because of the business erate got them! Since our local people are getting taxed on their phones we should have access to that money without all the strings of a free and reduced lunch program. Our parents pay into it on every phone bill and sometimes we don't get to use it, now that isn't fair.
 223. It just seems that the whole process could be much simpler. There is money being spent on erate consultants to file your information that could be spent on our students.
 224. It was extremely hard to get our \$ from E-rate. We have a formal name and AKA name. E-rate refused to issue our refund due to the difference in name. It has been extremely frustrating.
 225. It would be great if content filtering was also eligible for E-rate.
 226. It would be great if you had a list of what you need to do every year and approximate time lines. I am always terrified I will miss a date or that I missed a form. But really the 2nd year and following are not that difficult. It is just actually figuring out which form you need and when to file it. I feel like the program is designed so you need to hire a consultant in order to participate.
 227. It would be helpful to know the outcome of the C2 program sooner rather than later. It would be helpful to have a local or state person who can answer questions when they come up.
 228. It would be impossible for us to apply to E-Rate directly through USAC - we need the help of Funds for Learning. Discounts should be based on the locale's cost of living; we don't participate in the NSLP so our discount is not reflective of actual need. Cat 2 is too restrictive to use; we have made many essential purchases but were unable to get a discount. With all the rules about what's covered, our most important equipment only qualified for a small percentage - a next gen firewall / security appliance, required for CIPA and COPPA, etc., is a requirement for a school, yet E-Rate only covers a fraction of that appliance, and does not cover a warm spare at all. Essential equipment like that should be covered.
 229. It would be more efficient to distribute all funds directly to districts based on a formula that considers enrollment, attendance, staff FTE, and poverty level.
 230. It would be nice if support costs for the equipment could be erated and allowing for 5 years of support to be erated the year the equipment is purchased so we get bigger discounts on the support.
 231. It would be nice if the EPC portal could be used to submit 472 forms, using two systems adds unnecessary difficulty.
 232. It would be nice if the list included all things that a school now requires—such as security equipment that is vital for the safety of our students.
 233. It would be nice Internet filter products were covered.
 234. It would be nice to have training in the fall as we only use the portal once a year
 235. It's a complicated process but we wouldn't be able to function without it.
 236. Keep funding going for C2.
 237. Keep it simple, most of us don't pay someone to fill out the forms, so we need it easy
 238. Let's get back to district-wide funding. The current way has really put two of my smaller schools in a bind. They no longer receive enough money to upgrade a 10-year-old wifi system. We need to be able to file as a district so that all the schools in the district can benefit from this. Let the technology folks once again decide where erate would most benefit the schools.
 239. Library would be unable to provide the bandwidth we have without Erate. Without Erate funding we could barely provide any Internet with our minimal budget - anything over the current \$200 a month we pay after the discount would wreck our budget.
 240. Losing funding for telephone service has negatively impacted my school district. It would be great if that funding could be restored at some level.
 241. Make it more user friendly. It has felt somewhat unstable changing Help Desk and PIA review. You have lost a lot of institutional knowledge.
 242. Make the network core equipment such as firewall, core router, modulating electronics, and content filtering Category One eligible. Simplify the forms because if nothing else changes the forms need to be simplified and made less confusing. Get rid of the Form 486 and add CIPA Certification to 471. Get the rest of the forms such as the Form 472 into EPC. As bad as EPC is, applicants need one portal. Lessen some of the restrictions on what can be done with the services. Schools and Libraries could benefit from partnerships with other local municipalities by allowing ISP traffic to fail over to one another in the case of an outage, or by piggybacking off of portions of each other's fiber to connect locations at a lower cost.

- Schools and libraries could not have robust networks without the E-rate program, as it is cost prohibitive. The E-rate program opens up the world to students and patrons by allowing them to access the internet in a learning capacity. The limitations of the program and the difficulty of the program however, are holding them back from truly thriving.
243. Make the process status more transparent. Make it possible to TALK to someone who can do something. Make someone responsible for responding to your inquiries. Unreturned voice messages and email is not acceptable behavior from USAC and support staff.
244. Making phone cost eligible again would greatly help our district.
245. Managed Wi-Fi has become a cumbersome, costly arrangement and is forcing schools into subscription based services that become bricked if not kept current. For this reason I don't feel that managed/cloud wi-fi should be covered and I feel like wi-fi vendors are pushing clients in that direction in order to lock them into recurring costs, which will continue to eat up USAC dollars and take away from other, relevant C2 needs.
246. Many of the devices currently available are not useful or meet our needs. Providing funding for a computer now and then would help this library reach the needs of the community. Thank you,
247. E-rate is a wonderful service for libraries and schools.
248. Many small schools have no full time tech person and making the process with all the filings creates problems for us.
249. Margie Montgomery
250. MIBS needs to return to Category 1 eligibility.
251. More Cat 2 Funding is needed and flexibility in purchased services related to networking.
252. More help is needed for rural areas where the encumbent can't or won't invest in better and cheaper service. Give funds to communities to solve this problem, vs pie-in-the-sky funds going to providers. I strongly support: cat2 - 1) tool to manage and see budgets, near real-time info needed 2) district level funding (not school level) cat1 - make fiber build-out (lit, dark, and self-provisioned) more flexible, provide a better more intentional funding method for rural projects to include anchor institutions and ensure that the community benefit is real and achievable.
253. More responsiveness from reviewers please. Thank you.
254. More streamlined process. Ability to apply for Category 2 funding by all districts without as many restrictions.
255. More transparency of services provided by the ERate
256. Most definitely make the Category 2 budget district wide.
257. Moving to a district level C2 budget is essential to the next cycle of the program. Increasing the per-student budget is also going to become a more important issue with WiFi 6 launching and access point pricing going up with it along with the cost of switches to support these very high speed AP's.
258. My biggest issue with USAC is the inconsistency with which applications are reviewed. Descriptions that are acceptable one year are unacceptable another. When talking to colleagues this is often the case within the same year also. Two districts purchase the same equipment with the same descriptions, one will get accepted without questions, while the other will spend hours and days in the review process.
259. My District is highly diverse and has a high student poverty rate. We have used eRate Cat2 funding for multiple years. It has allowed us to upgrade our network (wired/WiFi) which would not have been possible without e-Rate funding. It would be beneficial for our students and community to expand e-Rate to include off-premise internet for our students and Wi-Fi on our busses.
260. My greatest concern is that the discount structure is not on a gradually sliding scale but has precipitous gaps. Our F-R participation rate is right at 50%. Change in status of a handful of students could drop us below 49.5% participation, creating a district shortfall by a full 20% of our eligible expenses. That is, our discount rate would drop from 80% to 60% with a slight drop in F-R participation rate.
261. My only frustration is how long it takes to get funding approved. We waited over 12 months to get 2018 C2 funds approved this year! That is unacceptable and makes it very difficult to complete projects in a timely manner on such a limited budget. Hope this year is better!
262. My responses represent the 30 school districts in our consortium.
263. Need internet filtering as an eligible service, that would be available to be purchased under our discount
264. Need to add cyber security to E-Rate. There is an ever increasing need for it.
265. Need to improve the customer service for EPC and USAC. It will change everything at this moment customer service is very very bad.
266. Network security/Firewalls with advanced protection should be eligible as they are very costly yet essential to running a network.
267. Networking support (switches, UPS, etc.) for VOIP should be supported, even if traditional telephone is not.
268. NM appreciates the support of USAC for tribal libraries in NM. It has made a significant difference. Also, Off campus internet would help NM. WI-Fi School buses are so critical for student success here in NM (we are the 5th largest and most rural of states)
269. Offer real joint purchasing capability and use the volume to drive down prices. The current system just incentivizes the vendors to charge more because they know E-rate pays a portion

- and they want to skim more profits off the government.
270. One of many poor service examples - Each year, we apply for qualifying jetpack services and it is denied by USAC. Eventually, it gets approved. USAC needs to clean up their review process, follow eRate rules, have people really read applications and stop wasting our time and money. Also, self-constructed internet systems should be allowed under Category 2 - it would be much cheaper than using a qualified vendor with an active SPIN.
271. One of the goals with the implementation of EPC was to make the application process simple. Unfortunately, it is more complicated than ever. As with most government sponsored programs, there are too many forms, confusing deadlines, and a lack of interest in things that we actually need. There was a time when my district did not qualify for C2 funding. Because we didn't want to get left behind, we found a way to fund our own self provisioned fiber WAN to connect our campuses. It is my hope that if we ever need to update/upgrade that WAN, funds will be available to us. Additionally, school districts are required to implement security/safety measures to ensure that students are protected from objectionable material, yet no funding is made available for content filters and similar tools. It would be most helpful to schools if USAC would include such items on the eligibility list. While delivery of high speed internet to classrooms is the ultimate goal of USAC. It is also important that those unfunded mandates such as online safety also receive due attention.
272. One of the issues facing WV and Braxton County is rural area connectivity. There are many areas that do not have high connectivity capabilities, which mean that many students do not have access in their homes. Additionally, there are only two providers that bid in our area. This does create a choice issue, therefore, price is not optimal. There is also issues with the quality of service that we receive and getting assist from our provider when problems arise. Frontier seems to have a monopoly on voice and data in our area.
273. One thing I don't like currently is it doesn't appear you can ever use your entire budget of Category 2 funds.
274. Our community would greatly benefit from access to WiFi on busses and school provided internet at their homes. This would allow for a greater flexibility in the use of online resources and blended learning. Extending the classroom to anywhere our students have a device is key to success in a 21st century learning environment.
275. Our contacts are always nice and courteous, but I have problems navigating EPC. It would be great if it was more user friendly.
276. Our current ISP vendor needs more oversight by E-Rate as they try to use unethical bidding practices that decreases competition. We have heard complaints from other school districts in this regard..
277. Our district has been participating in E-rate since Year 1. It has allowed for technology upgrades we would have never been able to accomplish on our own. Prior to E-rate 2.0, we had been a beneficiary frequently in your Top 25 nationwide. The change to E-rate 2.0 drastically cut our technology infrastructure budgets.
278. Our District is a rural farming community that no longer farms. The result of which has led to a decade of budget cuts across the District, including the Technology Department. If it wasn't for the E-Rate program, our District would still be using antiquated network switching equipment, we would not have a fiber backbone in each school, and we would not have an enterprise wireless solution in place. All of which we have upgraded over the last 8 years due directly to the E-Rate Priority/Category 2 funding program. As VOIP becomes the standard telephony protocol, being able to have it fall under the E-Rate eligible services list would be extremely beneficial to our District. Analog telephone costs are very expensive in our area of the country and being able to convert our systems to VOIP would be a huge cost savings for us. In regards to EPIC, I have found it to be very easy to navigate and each year it seems to be better and better. From when I started in this school system (2010) till now I have found it to be night and day. Thanks for all the hard work in developing a really good tool.
279. Our district simply wouldn't survive in a digital world without the help of E-Rate. Without it, our schools wouldn't be able to compete with schools or choice or be effective in this generation
280. Our library is so thankful for it! Thank you!!!
281. Our rural single-site library has benefited greatly from the E-rate program. Without E-rate both internet speed and the number of computers available to the public would be greatly reduced.
282. Our School District is very dependent upon Internet for all services. The loss of Internet support would be devastating to our district and most others in MA. There are still some places that are far from equal to the larger cities networks
283. Our school district would not have been able to build our current WAN without the help of the E-rate program, but we still have work to do.
284. Overall a worth while program. Lack of support for filtering seems counter-productive.
285. Overall good process, contract reviewers vary in QOS.
286. Overall its a great program, but some of the drop down answers are too broad and we need to be able to customize them down a lot more.
287. Overall the system has gotten

- much better. PIA review tends to still take too long, but decisions have appeared to have gone faster this year. Navigation within EPC still I feel could be much more natural and flow better. Additionally, If there were a better way to structure eRate funding where the process was less involved overall it would be better and picked up by more. As it stands now, a single person in a school district is busy with eRate for two-three months a year! Many times that district can't afford that person to be so busy on just one thing.
288. Overall, the Erate program has been a great help in aiding our school district with internet connectivity and wifi.
289. PIA is simpler and less stressful using EPC with email notifications. Over all EPC has made the E-rate process so much easier.
290. PIA needs more training - some of the simple questions are not being corrected as M/C errors. FCC needs to make the rules in enough time so that all applicants can understand and file applications accordingly. The program needs to be helpful to schools not a got you system.
291. PIA this year seems much less well managed than in years past - this was to be expected, somewhat, in the switch over of companies handling it, but we have gotten surprising questions that really don't make sense based on the application submitted. It was also nice to have the same reviewer for all applications in years past - that way they had a better understanding of your organization overall.
292. PIA workers: It seems some of the people I have worked with have a very limited understanding of the systems and terms on USAC forms based on the questions they ask. It is very annoying.
293. PIA, PQA and reimbursement review processes take entirely too long to complete. The reviewers ask for the same information that was requested in prior requests. Its as if they have no records of prior records to review, to see what type of entity we are, what our previous requests have been, the resolution of the reviews. Every review seem like we are starting over. Very inefficient.
294. Please allow coverage for Content Filtering.
295. Please bring back funding for telephone services!!
296. Please bring back funding for telephony. Also, please fund multiple ISPs if the cost of the ISPs are reasonably comparable. Not only do we need additional bandwidth, but we need the reliability of a second connection the Internet, especially during the state-mandated testing season.
297. Please bring back tel-co services Thank you,
298. Please bring voice services back and make the C2 budget district-wide instead of by campus.
299. Please consider adding back telephone services and expanding the current technology coverages.
300. Please consider subsidizing 4G/5G hotspots through mobile carriers for providing Internet to families on NSLP. It will be the most seamless way to do so.
301. Please consider the following: - IP Phone Eligibility - Bids have to be uploaded to the EPC (not mailed, faxed, emailed, etc.) - Allow bus WiFi - Funding for filtering devices and services (I understand that it is a federal law to have it, but it should be eligible for E-rate)
302. Please continue it. We could NOT afford to have Internet/network services without it.
303. Please help us replace aging wi-fi equipment and infrastructure in our schools that is not sufficient to keep up with demands now with increased usage and old equipment.
304. Please keep category 2 funding... that greatly helps rural school districts like ours.
305. Please keep working to simplify the program for applicants. It would also be great if all documentation that an auditor would need to see onsite were also available online. Auditors could then readily access that info and notify districts and libraries if they find any errors or issues associated with C1 or C2 purchases.
306. Please make the application process easier. Too many steps/ rules that make it hard to apply for these funds. I provide technology support for a small school district and wear many hats and it is difficult to try and follow all of the rules associated with this program. We have in the past been reviewed and found to have done everything right only to have funding taken away years later.
307. Please make the EPC easier to use and navigate. Thanks!
308. Primary concerns are with the EPC as documented earlier.
309. Process for Cat 2 funding is slow enough that projects have to be re-evaluated because equipment is already out of date. It would be best to be able in a school/ district to have funding notice by summer so projects can start during down time.
310. Process is just complicated enough that we use a consultant. This is a waste of time and money. This program was beneficial many years ago. It has outlived its usefulness. Connectivity is a utility now. Organizations should budget for it like water and electricity. Please publish how much money this program collects vs. how much money is paid out.
311. Professional development for increased use of these resources should be included and districts required to provide.
312. Redundancy and Security should be included in funding. They are two very relevant and important subjects in the world today.
313. Redundant ISP is a huge falter for us. Not only can I not use E-rate for this, but I lose qualification for primary service if I purchase myself. Home hotspot plans would be beneficial. Both of these impact our rural

- community.
314. Regarding Cat 2 funding, what applications submit funding for amounts greater than the allotted amount, the entire application should not be denied (assuming all items are allowable), it should simply be approved up to the amount allotted to the applicant.
 315. Reimbursements for voice services need to be included in funding again. These services are vital to support the day-to-day operations of schools and districts in providing security and safety solutions for staff and students.
 316. Re-institute rules to maintain net neutrality.
 317. Removing Telecommunications from Eligible Services impacts the safety of students and would be very beneficial if reinstated.
 318. School bus internet would be nice, but it is way down my list of priorities. With the current infrastructure in this area, it is not possible at this time. Since filtering is required for every school and library, it is beyond my understanding why it is not an eligible service. It is a part of a network, that implemented poorly, is detrimental to the whole network, yet it is not eligible for support. This is one of the highest priority issues that needs to change. Phones would be nice to have back on the eligible list, but I would not trade one of the current services to get this service. EPC needs to be updated to be user friendly. It is a poor interface that could contribute to errors and does not inform users well of the tasks that need to be completed. Take a look at Facebook, or any other social platform, to see how a modern, interactive website should operate. Important notifications and incomplete forms should be front and center when a user logs into EPC.
 319. School safety -- limited, but to address applications and appliances to aid in keeping kids safe. This will be a big debate... but worth consideration.
 320. Schools and Libraries are required to provide filtering for internet per CIPA. We need assistance paying for filtering. This is a huge expense for schools.
 321. Schools are lacking equipment and infrastructure and there is not enough C2 budget to buy all of it. The school district is losing money every year due to student enrollment and it's tough to improve our network because of lack of funds.
 322. Schools are under constant threat from phishing, DDoS, etc. Please consider supporting schools and districts in their effort to defend against these disruptions and potential damage caused by such attacks.
 323. Schools that are located in rural location and have limited internet providers and services, the community and students use the school internet as their primary internet access. Being able to share internet access beyond the campus would help the student with online homework and access for parent student grades.
 324. Schools with small class sizes for, especially for at-risk or special needs students, suffer in Cat 2 because the installations costs are the same as regular schools.
 325. Security would be the next thing that needs to be added. Like cameras and support for them. That way the prices will be reduced then what they are now which is very high.
 326. See comments in EPC improvement section. Eliminate C2 budgets by location!! Collect total cost and # of unit figures and then have USAC do the simple math of determining cost/unit. It is way too cumbersome the way costs on applications need to be entered on a per unit basis!!
 327. Self Provisioning should be able to go back in time and cover those institutions who started their own process before the general allowable time. The highly threatening disclaimers are intimidating. The budget for Cat 2 should NOT be related to discount calculations. If you are going to say you have a budget, then fine, give us the budget but if you say you have a budget that you will have to come up with 60% extra then it is not fair to some schools who only get 40% discount. The Urban designation should never be given to schools that are Rural. Just because you have 40,000 people in your city limits does NOT mean you are close to the internet. Do you know how expensive it is to lay 500 miles of fiber? Those who are 500 miles from a major population have to pay the vendors of internet access lots more than in the metropolitan areas. If you want fairness be fair. Gig bandwidth in metro areas is a LOT cheaper than in the middle of North Dakota. USAC collects money from phone bills and people who live in a low FRL area are paying a higher 'tax' for their phones to pay for people who live in high FRL areas. This is not fair.
 328. Service Providers are in need of training in the areas of creating and supplying applicants with contracts that are in compliance with the E-Rate program. We oftentimes experience very lengthy wait times from when an award is made until a contract is fully executed only because of service provider slowness. This year we could have been done filing applications 2 weeks prior to the window closing, but couldn't complete until 3 hours prior to the window closing because a Service Provider waited until then to provide us with a fully executed contract. This has been our biggest issue with the E-Rate program in the last several years. EPC itself functions well overall.
 329. Services that keep schools safe should be eligible including security alarm systems, alarm monitoring services, Electronic Mass notification systems in case of lockdowns or active shooter alerts, Fire Alarm systems and monitoring services, in addition IP intercom systems that are not prevalent should also be eligible

- as a mass notification system.
330. Simplify and flexibility are the keys to make this program successful. Increase respond time for approving FCDL- it has taken over 13 months to get approved with a lot of pushing. This is completely unacceptable and prevents us from meeting our budget goals.
 331. Simplify Category 2 budgets. Make review questions clearer, not more complex. Improve the speed of the portal in high demand situations.
 332. Simplify the funding process.
 333. Since filtering (CIPA) is required, I believe the cost should be E-rate eligible.
 334. Since legacy telephone service became ineligible, 10 libraries stop doing e-rate.
 335. Small and tiny school districts should have the Cat2 Budget floor increased. Currently a tiny District of less than 1000 students, is unable to sufficiently fund all of the enterprise services required. Larger districts have larger staffing and are able to centralize many "District-Wide" services with in-house expertise, whereas tiny districts have usually 1 IT staffer or less and still need to pay for not only school related services/infrastructure, but also the centralized type services and there just is not enough Cat2 funding to be anywhere at parity with larger districts in terms of leveling the playing field of funding. Rural districts are even more disadvantaged.
 336. Small rural schools need e-rate funding as much as or more than city schools. With the state wanting everything online/in the cloud all services related to bringing this concept to fruition should be funded
 337. Some things you asked about I really don't have experience with. You should include an "I don't know" or something equivalent on the survey.
 338. Still believe that basic phone service should be eligible. It is a critical service that provides parents and patrons access to schools.
 339. Stop auditing every submission that our district turns in... This is getting ridiculous!
 340. Strongly agree that C2 budget be allowed for district wide. Then the current budget per student may be sufficient to support the C2 needs where it is needed the most for schools within the district.
 341. Strongly believe that C2 budget should be available district-wide to use in the manner that best supports student instruction and access to internet.
 342. Taxes and Fees are listed on the ESL, however, USAC's PIA reviewers constantly challenge this line item, and have arbitrarily removed it from FRNs. Applicants need to apply for taxes and fees, as service providers can apply taxes and fees to invoices at any time during the funding year. Our year end BEAR process is where we are able to capture the actual taxes and fees from invoices, not the Form 471 process. Applicants should not be stuck paying full taxes and fees when they are on the ESL. USAC shouldn't be allowed to disallow taxes and fees on FRNs through PIA.
 343. Telephone, VoIP and all communication services should be eligible services.
 344. Thank you for all you do for us!!!
 345. Thank you for helping our small rural have wifi and internet access!
 346. Thank you for saving us funds over the years.
 347. Thank you for the E-rate services. Thanks to E-rate our library is as up-to-date as it is. We are appreciative of the support you give to libraries.
 348. Thank you for the opportunity to provide feedback. I would like the FCC and USAC to continue to provide funding assistance to support the use of technology and internet resources in the classroom for students. I understand that there has been some talk regarding using USAC funds to improve internet access in rural areas by providing funding to current internet service providers to improve services in these areas. Personally, I do not believe this is the best use of USF funds. More research is necessary to assess current technologies, and make sure that citizens in rural and high needs areas are provided access in a cost effective manner. In our area, our internet service providers who offer rural service, do not provide the bandwidth necessary, nor do they use a technology that functions well in an area that is not flat. Providing the best access at schools and libraries makes sure that available bandwidth is used for educational purposes. Thank you again for this opportunity to provide feedback.
 349. Thank you for the survey.
 350. Thank You for this program, it is helping the students education and learning.
 351. Thank you! We survive with your support!
 352. The 471 was easier to complete than previous forms. Much was already "done." Also, I don't understand the category 2 applications. I would have applied had I known that repairs/ maintenance were covered.
 353. The 5 year budget is confusing for Category 2 if your enrollment changes from year to year as you come through the years trying to spend your allotment. Also when does the 5 year budget start - 1st year you spend the money or the 1st year it was offered?
 354. The amount of audits and additional questions has increased significantly for us, and this is causing additional paperwork and process. We've been able to respond to all inquires but why all the additional work?
 355. The application process is extremely difficult and off-putting. USAC personnel are helpful, but it is still always a time consuming process for a one-person rural library.
 356. The application process is too

- complicated for what little funding we are eligible for.
357. The application process is very unforgiving. If I make even a small error, it will cause major paperwork and research in order to make a request to correct the error - just to be denied funding.
358. The BEAR process is complicated and difficult to understand.
359. The biggest issue I see is with the limited project description. The ability to add more details would be helpful
360. The biggest problem is the extremely long lag time between when a need is identified (e.g., for new wifi access points), to form filing, then approval, then bidding, then purchasing, then reimbursement.
361. The C2 funding has been the biggest difference for small schools ever! Without the State of Arkansas applying for bandwidth for its schools and the C2 funds per student has kept our school competitive to our bigger, neighboring schools. In some schools it has allowed them to continue to have a school. Props to the state of Arkansas and USAC. Thanks.
362. The C2 funding scheme is very frustrating. Since the school population changes over time, the available funds for the next filing year have not been easy to determine. I may simply not understand it correctly, but it has been very difficult to track the available funding remaining for each school..
363. The category 2 funding has been difficult, and we have had to reduce what our Board approved after the fact because we were told that we didn't have enough funds. We also were made to reduce category funds over a year after USAC approved it, and we purchased and installed the hardware. Giving funds to a school through a district-wide budget would be much simpler for everyone. Thank you for listening.
364. The category 2 funds that are available for our rural public library are necessary for us to continue to fund our services. Without the funding that this program provides, we would not be able to make improvements and perform maintenance on our internet services and network.
365. The change in eligibility of Voice services has been a real challenge for our district. Considering that Voice is a communications necessity and generally, our only viable option is a VoIP service, it would help the district immensely if Voice services were once again to become E-Rate eligible expenses. I also like the idea of aggregating eligible services over the district. It would be nice to be able to allocate funding as necessary to any site that needs it.
366. The choice for fully funding for our purposes would be less than \$250.00 but more than \$156.23. In the \$200.00 range would suffice.
367. The competitive bid process is very time consuming from a client perspective. I wish there was a way to vet the vendors who inquire. Most do not follow the terms listed for submitting an inquiry. Many times they are organizations who do not even have a SPIN.
368. The compliance review time must be shortened
369. The complicated online portals are driving potential E-rate applicants away even more than the phasedown of voice service discounts. The smaller/rural schools and libraries in most need of discounts can't afford to pay someone to handle their filing (and frankly, many alleged professionals fail to understand the needs of library applicants), and those applicants shouldn't have to devote so much time each year to relearning the portal navigation. Also, passing responsibilities from one staff member to another takes too long and requires too many steps. If EPC cannot be updated to allow users to change their emails, then a new portal should be designed from the ground up. The frustration and wasted time created by the EPC portal is shameful.
370. The complicated recreation of passwords is unnecessary. No one can steal your erate.
371. The concept of a single district-wide C2 budget is critical to our ability to cover the costs of WiFi in our buildings. As a growing school district, it is frustrating to have C2 dollars locked into buildings that are already fully outfitted with updated equipment, while we can only get partially funded (often less than 20%) of the cost of outfitting our new buildings.
372. The continuing of the per student based C2 funding is a much fairer way to distribute funds (as opposed to the 2 out of 5/ percentage based model).
373. The contractors such as Solix/ Maximus/Vangent need both more and better training. Otherwise, it will cause more applicants To not file. They make too many mistakes. The EPC has got to be upgraded or completely replaced as was promised by the FCC insiders about 18 months ago.
374. The current cost of our CEN connection is starting to push on our budget, even with the E-Rate discount. We would hope to see future costs for us to not be as big of a chunk.
375. The current per student budget is not enough to do anything with for many of our schools. It would also be beneficial if appeals could be ruled on quickly. We have been waiting for 2 years on a decision and still do not have one.
376. The current simplification of the ESL is an improvement over former practices. EPC is not all bad, primarily because I have gotten used to its quirks. But, it is not user-friendly. I have to resort to googling where to find things in EPC. I still bristle at the restrictions of not being able to edit contracts once they are created and not being able to edit organizations (entities; student counts, etc.) once the 471 filing window opens.
377. The entire E-rate program

- has improved over past years. Seems to be more relevant to the needs of schools now more than it use to be. Quicker turnaround of commitments is so much better than in the past. Without E-rate, districts would not be as modern and relevant with technology. It is helping to enhance education opportunities.
378. The EPC portal has many limitations and can be frustrating. The response time for invoicing and cases has increased majorly over the past year. Not having visibility into the invoicing side especially with the delays has been frustrating.
379. The E-rate application process is adversarial in nature. The amount of hoops to be jumped through for basic access is mind numbing. Then there have been numerous instances where those funds are held up for years at a time causing litigation. The money should be allocated automatically to a school system, not begged for. It would eliminate a ton of expense and oversight if the only "extra" funds came from tackling projects that exceeded the normal yearly allotment. I don't need new switches and wifi ap's each year. But I do need internet and wan connectivity every year. Give me a base budget that I can plan on and eliminate the need to apply for those base services. Thank you!
380. The ERATE program has allowed our Rural Area School District to have internet access. Without it we could not.
381. The E-rate program does allow to tackle projects that would otherwise go on without any update. This is a good thing, even though not all is E-rate eligible. I didn't really a district-wide model was being considered, rather than the current building-based model. A district-wide model would be wonderful. I feel the district is responsible enough to correctly appropriate funds to where it's needed most.
382. The E-rate program has been a critical funding tool for our urban school district
383. The E-rate program has been critical to the success of the technology program for our district. Without it there is not enough funding to provide a fully capable Wifi network with sufficient bandwidth to support online testing which is considered an un-funded mandate. Technology is very expensive when trying to provide access to every student but the E-rate program makes it possible even though it is still a funding challenge for school districts.
384. The E-rate program has helped in keeping the costs of for internet connections down and has saved us over \$40K per year almost. Plus it has allowed us to be able to up grade networking devices by off setting the cost with E-rate funds to help purchase these devices. It is a good program to have for school and libraries. Otherwise some would not be able to afford to have the internet connections or networks devices they now have today.
385. The E-rate program has made a massive difference in my District's ability to provide, support and maintain a technology infrastructure that can meet the demand of modern learning. As a school district in a lower income area, traditionally 80-85% free and reduced, I'd hate to think what are technology and access would look like without E-rate. About the only suggestion I have would be to look at an incentive for entities to not spend every available penny. The reality to me seems that all of us are in this together and if we are responsible for getting what we need, not what we necessarily can get because we just happen to have more money, then the program will be more successful.
386. The E-rate program is a godsend in our rural area, where the cost of internet is exorbitant and unaffordable for many, true high-speed is unavailable to many of those who "could" afford it. Our region has lost both jobs and local state and federal public assistance offices in the last ten years, which means that our patrons rely on the library for internet connections more than ever before.
387. The E-rate program is a vital part of our budgetary planning. Without it, we would not be able to provide the level of services to our district.
388. The E-rate program is excellent and it provides so much help to my district. However, it would be great if we could combine the C2 budget so that we can maximize the use of those leftover funds.
389. The E-rate program is so complicated and so easy to get wrong that it is hardly worth the staff time it takes to file, and our organization receives about \$17,000 a year in reimbursement.
390. The E-rate program is the best thing that ever happened to our school. We get services now that we couldn't afford before. Thank you.
391. The E-Rate program is vital to equal opportunity, high speed, internet access for all. While my hardware needs are decreasing as people rely more on personal devices to access the internet, our usage continues to increase. For all people to be successful, this access is necessary and often low income and/or rural customers are not able to provide this at home. This is where the local library becomes the equalizer! My community is currently well served by the E-Rate program but would be underserved without it. Thank you for this program!
392. The E-Rate program should be dedicated to helping applicants be successful. Providing needed guidance beforehand is imperative. Instead, it feels like nothing is ever certain and applicants can be punitively affected after the fact for potential infractions for which there was no guidance or even any indication that it might be an issue. Applicants should feel confident that their applications will be funded as requested (barring significant issues), rather than worrying that some

- unforeseen gotcha will cause a reduction or denial. Reviews should be quick and painless for both reviewers and applicants and not drag on for years.
393. The E-rate rules make it very difficult to obtain reimbursements when there is an upgrade, and the vendors cannot make it happen on exactly July 1st, there should be some flexibility.
394. The FCC & USAC organization guidance and funding have been a critical part of the student growth allowing for online testing plus being college and career ready. Thank you!
395. The FCC has established a program that penalizes small rural public schools and private schools with declining enrollments. The FCC does not understand that the square footage of the building(s) does not decrease when student enrollment decreases thus schools with declining enrollment are penalized with their C2 budgets. PIA still is unfamiliar with program rules and needs additional training from USAC. CSB personnel are still unfamiliar with program rules resulting in slow response times.
396. The filtering should be covered in Category 1
397. The length of time to approve my fiber installation seemed extremely long.
398. The notion of closing the homework gap via allowing E-Rate to somehow cover connections directly to student homes is a thorny one. It would likely create a very inefficient and expensive cottage industry of C2 equipment designed to make those connections. Also complicating the issue is that school districts would then have legal responsibility for what takes place on those connections being used by people at locations beyond the walls of the school, which is not desirable. The "take-home-mifi" idea might be manageable, but the notion of bringing homes into the extended WAN is not a good one.
399. The one thing that would help us (small rural school district) the most is the district wide use of funds instead of by school.
400. The overhead of the Application process remains a burden for very small schools. Figuring out the complexity of the process, and results of making one small mistake (non-funding, cancelling) for small schools applying is rough and disheartening. Large schools can hire outsiders or fund in-house time for the application process - very small schools are left with few benefits, or get lost in the complexity of the process and then receive none. Missing a filing day by a few hours literally cancelled our application and we lost out on several thousand dollars.
401. The PIA process is too rigid and non-uniform. Telephone and IP telephony should be included, this is very important!
402. The PIA review process is necessary but extremely frustrating when reviewers seem to be "checking boxes" and take the initiative to look at an application and deduce the facts. In addition, we can respond to one reviewer about student numbers for example and then within a week or two get the exact same question from another reviewer... seems redundant and unnecessary with computing that could have captured that evidence in our "data base" and be quickly referred to.
403. The PIA review process needs to be reviewed. Requests are often not clear and no responses make for concerns.
404. The portal is painful, I dread using it every year. The interface is not user-friendly at all.
405. The process at times becomes frustrating. The number of times we have had to justify an existing approved contract through the 471 audit process is ridiculous. Every other year I have had to send justifications for a contract that was approved for funding 10 years ago. I literally just re-use the same letter and change the send date. It is a waste of time for the auditor and my district. The time allocated to respond is sometimes not enough either. Giving people less than ten days to respond is difficult. If I am out or the person I need to gather data from is out we end up being late with the response which jeopardizes our funding. You auditors have gotten much better over the years in asking the right questions and understanding when we have to delay a response which I appreciate. Overall I hope the system continues to fund Internet access and internal hardware connections. The addition of allowing funding for a secondary connection would be appreciated. I would also like to see the window changed from five years to three years for a district to become eligible for Tier 2 funding.
406. The process is way too complicated
407. The process to taking advantage of E-Rate is still difficult to understand. Additionally, the documentation is so difficult we hire an e-rate consulting firm and have kept them on staff for 6 years.
408. The program as designed and implemented is nearly impossible to navigate and use successfully without the assistance of a professional consultant. School and/or library employees who deal with the program on a part time basis are at a distinct disadvantage and likely are unable to use the program to its highest benefit. It is also likely they stop trying after a period of time.
409. The program eligibility and clarifications for licensing as either basic maintenance or internal connections is too confusing and is determined by each individual manufacturers report to USAC/ FCC (i.e. Manufacturer may claim internal connections to USAC/ FCC, while product description falls as basic maintenance; however,

- because manufacturer has told USAC/ FCC that it is internal connections and the applicant reads the product description that has software updates, technical support, etc and applies for basic maintenance then are denied during invoicing after the fact and stuck with the bill. The applicants have no access to the various information from the manufacturers even when asked and many of the service providers don't understand clearly enough to provide the documentation when requested during the competitive bidding process. It should be provided as part of the eligible services list or funded under a single classification. This has created many issues with funding for required licensing that forces schools to pay for 100% out of pocket that they cannot afford and wouldn't have purchased if they would have known ahead of time. The eligibility of licensing should all be internal connections or basic maintenance but not both and certainly should be set by the FCC and not determined by each individual manufacturer's understanding of the erate rules. The manufacturer's have adapted their skus and product descriptions since cat 2 budgets became available and certainly have the ability to adapt to the requirements set by the FCC more easily than our appliants have the ability to become technical experts versus educators/ librarians.
410. The quality of network and internet systems is definitely at a higher level because of the E-rate program funding.
411. The recent gift rule changes need reversed. These rules place a burden on our ability to properly vet vendors. We can no longer accept demo hardware at any time during the year, regardless of whether it is an e-rate C2 project or not. Rules are overreaching. Revert back to previous gift rule.
412. The review process can take a long time to complete. This puts the applicant in a difficult place especially when budget years close before funding is committed. It can also delay other necessary initiatives that are dependent on the services being requested.
413. The size of the district changes impacts the way in which eligible services are acquired and distributed. The current requirement to identify needs by schools and the dynamics of the environment limit the ability to acquire C2 items when the needs of specific schools change after submitting the application.
414. The structure of the bidding process really needs to change. Going out to bid for technology equipment a year in advance really hurts us. We are purchasing outdated equipment and we lose flexibility to make changes based on student need.
415. The system is better than it was. The timing is awkward - we don't get notified until the funding year is well underway so we run the risk of not getting the funding and having to cover the costs ourselves. Thankfully this hasn't happened yet (we are a small poor school district so we are lucky.) I understand that they had some abuses and that now they are being cautious, but the system is rather cumbersome. EPC did make it easier, but it's still not user friendly.
416. The timeline to get a 471 approved is TOO LONG. A lot of projects need to be done as summer projects, but with the current 7-8 month long approval process of 471s, that means we have to make major network upgrades in the middle of the school year. This is unacceptable.
417. The USAC help desk are extremely helpful as I followed the process. They are the people that ensure success with this process.
418. The USAC system had a few glitches this spring with sending task reminders out by email for tasks that were already completed. This caused confusion but was easily resolved by calling their help desk (which has always been very helpful to me).
419. The website needs redesign. Finding and updating an incomplete for is difficult.
420. The whole E-rate process has to be easier to use. It's ridiculous that we have to spend \$3500 - \$5000 per year to navigate the bureaucratic mess that is eRate. This complaint falls on deaf ears because we can only make this complaint to E-rate consultants who have no reason to pass this information to the FCC/USAC.
421. There appear to be several inconsistencies in the application review process. Some applications seem to be approved immediately, while others face delay after delay. I have an application from last Funding Year 2018 which the status has remained unchanged for 7 months. This is not acceptable.
422. There are times when speaking to a person directly rather than texting or email would be more effective in building a relationship between home and school. Voice service should be leigible.
423. There are too many steps to get funding. USAC should simplify the process.
424. There should be more communication between USAC reviewers and applicants before funding is denied (1) on the 471 after applicant provides additional support for any PIA Modification Notifications - PIA should let the applicant know if applicant provided additional support is not accepted before USAC denies the FRN, and (2) on the 472 - USAC should provide sufficient feedback to applicants on why any SLD invoices are denied.
425. There should be zero ineligible network infrastructure, single C2 budget for all sites, and a minimum of \$350 per student. USAC needs to be more responsive, knowledgeable and consistent when it comes to PIAs, Form 500, etc. There are 471 applications from 2017 that

- have not been committed. The appeal process needs to be more efficient with USAC and FCC. It takes too long to get a response. The E-rate program is a win for schools, keep it going!
426. They are unorganized. Had 2 people from usac request the same equipment info for cat 2 finding query.
427. They need to get the Form 472 into the EPC portal. They need to better educate their Helpdesk staff and PIA Reviewers. The reviewers for invoicing need better communication skills and be more responsive to the applicant and service providers. USAC needs to be more proactive in helping applicants.
428. This E-rate program has given my district affordable bandwidth that we could not afford if not available in both Cat 1 & 2 services.
429. This helps us with our budgets to maintain the internet.
430. This is a good program for schools.
431. This is a great program and our district would suffer if it had cutbacks on funding. Thanks for your support
432. This is a vital program and needs to continue and expand services as state budget cuts continue to restrict our efforts to improve our networks to support quality 21st Century instruction.
433. This is my first year with E-Rate. I have found the EPC system to be fairly easy to use, especially compared to what I heard about the past system. Any additional training materials that can be provided on what actually qualifies for e-Rate would be much appreciated. The most difficult part for me is knowing what qualifies, how to classify requests, and other requirements of the program. Once you know that the filing part seems easy.
434. This program has been a boon to our school. An explicit overview of the process over the course of several years would have helped by allowing us to get more done each year.
435. This program has changed many peoples lives in our community. We are thank you.
436. This program has enabled us to leverage bond dollars for a dramatically greater impact. We were able to turn a \$86K investment into a \$250K project allowing us to have modern, high-speed, networking in all of our buildings. As a small rural district with not much of a tax base I don't see any other way we could've made this happen.
437. This program is critical to the operation of our school and every organization that qualifies.
438. This program is essential to our school district. The more funding we receive the more impact we have on our students and community.
439. This program is extremely important to our school and its scholars. Without it we could not afford this asset. Thank you for providing this program.
440. This Urban Title 1 School could not afford internet services for its students without the erate program.
441. This was my first time filing as I'm the new District Tech Coordinator/ CIO. It was a VERY difficult and time consuming process. I teach 4 classes each day and I spent at least 2 full weeks on this process. For such a small district, it was very difficult for us. My finance director and KETS field staff helped me too. There needs to be a straight forward training with cut and dry answers. I asked questions and people would give me different answers. In order to run efficiently, we HAVE to HAVE the e-rate funding. We are trying our best around here but to be denied because the one part of a form wasn't filed correctly is crazy!
442. This was my first year with the E-rate program. I felt the process went well. State E-rate Coordinator was a great help for me.
443. This year we were hit by a surprise from 2014/15 fiscal year. We followed all the rules and were allocated a certain \$\$ amount for that fiscal year by USAC. USAC came back this fiscal year and told us they gave us too much money that year and we had to pay it back or we would no longer be eligible for E-rate. Since this was not our fault and we played by the rules - this seems very unfair and unethical.
444. To say E-rate funding is vital to my rural library is a gross understatement. Our library simply cannot serve our community without E-rate funding. We are a municipal library, receiving our funding directly from our municipality. We're in the same budget pot as both emergency services. Without e-rate funding, we would not be able to afford the internet services we need. There is zero room in the budget. I am my library's (and to some extent my municipality's) only IT person. My training is in libraries, so I'm learning IT on the fly. I would love the FCC forms to be even simpler than they are now with better help menus and clearer explanations of the questions asked. Please keep in mind that you've got a lot of non-technical folks who rely on this funding trying desperately to answer very technical questions. My worst fear is that I'll mess up on the E-rate forms and jeopardize my library's e-rate funding. Help a girl out and make things so simple you think a 5-year-old could do it.
445. Too complex for small rural schools.
446. Too many restrictions on what you can use the money for and how we use switches and WiFi
447. Traffic shaping and prioritization appliances should also qualify. This technology allows for far more efficient use of Internet circuits than those without them.
448. Transitioning to a single district-wide or library system-wide C2 budget rather than building-by-building C2 budgets would be a significant step in the right direction, alleviating a significant amount of time managing building-level funding availability

and budget allocation, providing more time for Districts to focus on instructional initiatives and programs.

449. Updated interface and process

450. UPS systems should be all encompassing and included provided they are supporting systems that support our network. E.G. - almost all sites have servers, UPS systems are used to keep them up and functioning in our environment. The EPC system still need some work. It's cumbersome to traverse. Wording is particular but not easy to follow for the average person filling it out. Power is required by all systems included/supported by the program however power and energy systems are not included to be funded. Major costs come into play with equipment being added due to the cost of electricity. Systems could be put into place to offset some of those costs and reduce the overhead to incorporate these systems. (e.g. wind / hydrogen / geothermal / hydroelectric / etc). There are ways to offset some of those costs to help school districts out. Telecommunications is absolutely key to every organization - why telecommunications would be removed is unreasonable. If it was to allow other districts to purchase wifi and networking systems that's fine, perhaps a limitation can be added to prevent those things from occurring during the same application year. But after you have a functioning system in place, years afterward could be used to offset those inherent costs. Web hosting used to be included. I'm not aware of any district out there without a web based presence. It would be great to bring that back, (prices have gone up not only because erate funds aren't there to offset costs but also, they don't have to compete within the program itself). Districts should be able to use the funds district wide but have to report individual school purchases. The reality

is that not all school buildings/sites are equal so locking funds into a building that, say, was built before another building, makes no sense. I wouldn't have to spend erate dollars on wiring for that building but the needs may be different in my older building. If there was an opportunity to include pricing between districts in the filing process, it would be helpful for people to see where they are at (think education super highway). Ideally, there would be a way to add consortium pricing (multi-district purchasing). In theory, someone from USAC could advocate with a vendor on their behalf to get even better pricing) - everybody but the provider wins.

451. USAC and/or FCC needs to provide strict, targets program evaluation of large consortium programs (such as state-run, statewide e-rate initiatives) in order to ensure that services are being accurately and completely provided to those entities which are essentially "forced" into joining the statewide consortium. Metrics such as excessive downtime with the statewide providers, customer dissatisfaction with implementation and administration of the statewide consortium program, etc.

452. USAC is a cumbersome process and needs to be simplified.

453. USAC is the worst run organization I have ever dealt with in my entire career.

454. USAC needs a process for handling complaints and illegal activity by telecom sales representatives. This has cost our organization hundreds of thousands of dollars in the past five years. Telecoms whose sales reps lie should not be allowed to participate in E-Rate programs.

455. USAC needs to increase funding for Category 2 funding to over \$350.00 per student. Internal connectivity is vital to the infrastructure of the school's networks that they can ill-afford to purchase because of limited funding.

456. USAC needs to make significant improvements in the timeliness of the review process - applicants have to meet strict response guidelines to inquire, or face denial. USAC should be mandated to issue decision letters in a timely manner. An applicant shouldn't have to wait more than 60 days after the filing of their application for a decision letter, then again we're waiting over 300 days for FY2018 application? Upper management at USAC needs to be more responsive to the needs of the applicant community. I'm tired to hearing of all the great things USAC is doing or planning, what we need is better and more timely review process. And how about consolidating all of the databases and programs. For example, one program to request data applications from 2014 and earlier, a second for 2015, and a third for 2016 and later? Really!!

457. USAC should have field agents to check and see if maybe some fiber services could be shared amount different entities in the close proximity to each other.

458. USAC should hold an in person training every year in Texas as large as it is. Secondly, Region Centers have E-rate Consultants conduct their meetings and all they do is try to scare the people in the room with you will go to jail. You need to hire us. Many do not want to worry with any funds from USAC with this type of worry. Not worth the effort or the time if going to jail when trying to do your best especially for a few thousand dollars in funds for my district.

459. USAC should not be in this business! I can't believe the crap we have had to deal with these totally rude and incompetent people. I don't think it's fair that the FCC would ask for reports that are so old---asking for information from three, four or five years ago.

460. USAC's EPC Support line is EXCELLENT!!!!

461. Very difficult application process!

462. Voice communication remains as

- important to schools as internet and having voice services be eligible again would be a huge help to schools.
463. VOIP services should also be eligible for erate.
464. We appreciate the quick response time on questions.
465. We are a library consortia. We file erate for transport costs because our public libraries do not (and will not) filter and therefore are not CIPA compliant. Very few vendors will separate the transport costs on the invoicing. We can only file for a subset of our libraries that use this one vendor.
466. We are a small county library and extremely thankful for the support from the USAC/FCC.
467. We are a small rural school so any assistance we get is greatly appreciated it. we have quite a number of free and reduced students so having internet access is very important. We are not a wealthy district and our needs are way beyond our budget. It's a challenge for sure so we greatly appreciate the E-rate program.
468. We are a very small district and depend heavily on the E-rate program to help build/maintain our network infrastructure. Without the help of these funds, our infrastructure would struggle to keep up with today's needs/demands. We also depend heavily on the reduced cost for our internet service as we do not have much competition in our area for transport services.
469. We are a very small rural library that could not provide quality internet access to our patrons with the e--rate program.
470. We are a very small rural public library. If not for E-rate, we would not be able to provide internet services for our patrons. We currently have 8 public computers and many afternoons they are in use, by students and adults alike. Most of our students do not have access to internet outside of the Library and we provide the only free Wi-Fi in our town. E-rate funding is critical to our library! We have been unable to utilize the Category 2 funding until this year because we had to pay the difference and it hasn't been in our budget.
471. We are grateful for the help you provide us.
472. We are in a rural small town with only 2 ISP providers and neither one has the capacity to provide what we need. We need to have both connected to combine them in load balancing to get what our school needs.
473. We are required to filter content but we cannot file this with E-rate. We really need help paying for this unfunded mandate. Phones need to be covered by erate. It was a tremendous increase on school districts when this went away. Schools need more funding on CAT 2 it helped a lot but we currently out of funds and could really use some help.
474. We are so appreciative of services and program support we receive at this time.
475. We are the only real place for people to access the internet in this town and we have excellent service with OneNet. IF we didn't qualify for E-rate, it would be devastating.
476. We are very appreciative for the programs and funding that allow us to provide these services at a reduced cost to our general budget.
477. We could not afford to provide Internet at this speed if it weren't for the E-rate program. THANK YOU!!!
478. We could not survive without this program. I would love to see telephone services covered again, but not at the expense of losing C2 funding for internal connections.
479. We couldn't afford the quality of service and equipment without E-rate. We appreciate everyone there. They reply to our questions very quickly and are always friendly. Thank you!
480. We currently cannot file our Internet connectivity with E-rate due to our ISP being a consortium. It would be extremely helpful if that could be changed so that we could file for a connectivity discount the same as if we had a normal "telco" provider. The consortium offers an extremely efficient and outstanding service to schools and libraries - I believe we should be able to receive the same discount on our connection.
481. We currently offer outstanding internet services to our students. Without the E-rate program those services would not happen at our school. We could not afford the services we have now.
482. We currently provide mobile hotspots for checkout to our rural customers that can't get internet...I would love it if that expense was funded
483. We definitely need this program to supply the technology to our patrons.
484. We did not apply for E-rate, because for the last 9 years, every purchase was scrutinized by the PIA process. Many of the PIA's were redundant; and it looked like the PIA representatives were working off a template and not looking at the information we were sending. The year before last, it got to the point that it took too much of our time for the little benefit that we got from E-rate. So we did not apply this year.
485. We do appreciate the support and services USAC provides through the E-rate program. Please continue to listen and consider the suggestions schools and libraries are making to improve the program.
486. We greatly appreciate the financial assistance provided by USAC
487. We had used E-rate to pay for our phone bills for several years, allowing us to use that money to budget for other technology uses in our district. When that changed, our long range plans fell apart. We are just now recovering from that switchover. Using that savings, we purchased district wide wireless access for our students. You can imagine how that changed in erate

- emphasis skewed our long range plans.
488. We have decided not to apply for future funding through the E-rate program.
489. We have had a hard time getting correct numbers for how much money is remaining for a school.
490. We hire a consulting company because of the importance and complexities. Couldn't do it on our own. The only issue I have now is the strong handed way the OCC and PUD are handling the OUSF portion. It's also another hugely time consuming task to be done in addition to the already complex USAC and FCC filings.
491. We need a committee meeting with to discuss Charter Schools E-rate support in relationship to school districts, this needs good representation from charter schools. Decisions have been made without proper charter school input.
492. We need any rule changes to be made well in advance of the filing dates for erate to plan and make changes accordingly.
493. We need more flexibility on how we spend the money. Voip and phone services need to be covered at a higher percentage.
494. We need national public broadband. E-Rate is a terrible system and needs to be done away with. It's a tremendous hassle that only serves to enrich quasi-private and private entities.
495. We need to build equity in Arkansas by providing our community with the same internet access as what we provide schools. Learning happens more than just in the classroom.
496. We partially base technology purchase and upgrade decisions on how much E-rate we will or won't get.
497. We really, really could use telephone reimbursement again to pay for and improve our VOIP system.
498. We should be able to go over the amount for cat 2 and pay the difference.
499. We strongly depend upon E-rate.
500. We will be using E-rate for the first time as a consortium has been formed for our Rural libraries (including schools) Very grateful!
501. We would like to move towards a virtual computer lab but need more technical and financial support to do so.
502. We wouldn't be able to have Internet if it wasn't for the E-rate program.
503. Web Filtering should be an eligible product/service!
504. Web filtering technologies should be fully covered. Currently, it varies. We've been able to get partial covered due to supported services of UTM/network security appliances. But, a full specific web filtering solution would help greatly. I feel that our current solutions in place are not adequate. But, without any additional E-Rate funding for that specific technology and tight budgets, we are left with the web filter/content filtering services provided by our UTM appliance.
505. We're mandated to have filtering services in place for students/ staff, however, it is not eligible for E-rate funding. It would be helpful to have this covered. Also we lost the funding for web page hosting a few years ago--would be helpful to have that funding back.
506. We've only tried to use E-rate once. It's been a complete disaster with the Internet service provider negotiating in bad faith and threatening to sue us. USAC and the FCC have just stood by with no assistance for guidance. What a waste of time and money.
507. What would help with Cat 2 funding overall would be a change to district from school and a clearer picture of the frequency of funds - either a set 5 year window or rolling 5 year window would allow for better planning and budgeting for network infrastructure upgrades.
508. When C2 was changed to a dollar per student, it killed our ability to update our internal network and our ability to be proactive in our aging internal network. We are a very small rural, low income school with very little funds.
509. While I understand the need to focus on broadband, losing discounts on telecom services is a burden for my school district. The services are necessary and expensive.
510. With all the need for privacy and security, I think the firewall equipment and services that go along with the firewall should all be allowed too. Tks
511. With recent changes, we have not been able to take advantage of all of our C2 funding since it is by school. We could make better use of the funding if it were allocated at the district level and we could determine where the funding is most needed. School districts do take in account the equity of goods and services across the district. Any equipment or software required to deliver secure services to our students should be eligible.
512. With school networks being critical to supporting all aspects of K12 (security, HVAC, and student learning) things like switches and firewalls should be fully funded without worrying about what is plugged in at the other end.
513. With the money we received from E-rate, our bandwidth increased from 5 to 500 with the necessary wiring, equipment, etc.
514. With the need for additional security of our schools, I feel that security cameras, software and other safety-related equipment that can make schools safer should be considered for funding.
515. Without E-rate funding, our library would not be able to provide internet service to the public using only our current library budget.
516. Without E-rate our library could not fulfill its mission. However, I worry that many ISPs inflate their prices because they are taking advantage of the E-rate system. Finding some sort of national or state "reasonable" cost and tying E-rate to that might make E-rate funding go further and do more. It would be a super-difficult

- process to setup and make certain was fair while minimizing negative effects, but it might be worth considering. Also, streamlining the application and management process would be very good. Currently, we employ a contractor just to handle the E-rate application and admin.
517. Without the E-rate program we would not be getting reliable internet to our school next year. We are REALLY looking forward to it. This is our first experience with E-rate.
518. Without the E-rate program, our library consortia simply couldn't function. We provide services for some of the poorest communities in the state and E-rate is a vital partner in fulfilling that mission.
519. Without the E-rate program, we would not be able to provide adequate internet services to our member libraries and the community.
520. Without this program, we would be unable to provide the services we do.
521. Would be great if districts got a set amount of funding to spend - then get what you need approved. The E-rate application/filing process needs to be changed.
522. Would like e-rate to cover cost of Servers
523. Would like it if USAC would not start reviews while the 471 filing window is still open
524. Would like to see eligible list expanded.
525. You have done a fantastic job. Here is the deal if you bring back the telephone Cat 1 stuff, schools will be able to take the savings from that program and spend it for the technology they need. MOST have built out their networks AND or used BOND money to build out their networks. You give us the Cat1 Tel Co stuff back AND perhaps mandate that the saving go into technology for the district. THIS could include spending on software for students, or training for staff (so that the can save on 3rd party outside management). Cat1 Teleco must come back in order for this program to continue to be effective in assisting and supporting schools and their educational mission.
526. You need to process forms more quickly for large applications. Invoicing must be improved - especially those BEARs that have been forgotten.

Funds For Learning

Funds For Learning, LLC (FFL), is an advocate for the use of educational technologies and student Internet access. Formed in 1997, FFL is a professional services firm that focuses on E-rate funding management and compliance support. Each year, FFL's work directly supports millions of students and library patrons throughout America.

Professional Standard of Conduct

FFL has established and implemented several self-imposed professional consulting standards for our firm and its employees. Although no formal regulation exists governing E-rate consultants, FFL voluntarily complies with the following Code of Conduct, Code of Ethics, and Code of Client confidentiality.

CODE OF CONDUCT

FFL understands that conflicts of interest or the appearance of impropriety can negatively impact customer trust and/or E-rate application success. Therefore, FFL has a comprehensive Code of Conduct to which its staff complies.

Below are several key elements of this code:

- FFL does not sell or offer any E-rate eligible services
- FFL does not have a SPIN (Service Provider Identification Number)
- FFL does not prepare technology plans
- FFL does not advise clients on what technology to procure or from whom to purchase it.
- FFL does not receive payment from service providers based on their sales to applicants.

CODE OF ETHICS

FFL is a founding member of the E-rate Management Professionals Association (E-mpa®). This association has developed a comprehensive Code of Ethics for E-rate consulting firms. This Code of Ethics is based on similar codes established for Certified Public Accountants. As a member of E-mpa®, FFL agrees to comply with the E-mpa® Code of Ethics.

CODE OF CLIENT CONFIDENTIALITY

FFL places a high value on client confidentiality. FFL employees frequently receive confidential information from client customers. FFL does not share that information with other parties. Furthermore, as a condition for employment, each FFL staff member agrees to and signs a strict client confidentiality agreement.