

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of

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**Modernizing the E-rate Program for
Schools and Libraries**

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WC Docket No. 13-184

REPLY OF CENTURYLINK

Responding to the Bureau’s Public Notice,¹ commenters of all types agreed that the E-rate FCC Form 470 “drop down” process warrants improvement. The system is meant to simplify the application process while providing a clear description of the products and services desired, enabling potential service providers to efficiently assess opportunities and develop any bids. In part because of the limits of the current menu options, applicants and their consultants often introduce errors. In addition, too often an applicant provides insufficient detail about the services requested. The Commission needs to address both problems. At the same time, it should ensure that service providers have flexibility to bid in the most cost effective way.

Making the Form 470 process clearer for applicants

CenturyLink agrees with other parties that the Commission should make the process clearer by improving descriptions in the drop down, which in turn reduces applicant confusion, funding delays and denials caused by avoidable check-box errors, and improves service

¹ Public Notice, “Wireline Competition Bureau and Office of the Managing Director Seek Comment on Improving FCC Form 470 Drop-Down Menu,” WC Docket No. 13-184, DA 19-986 (rel. Oct. 1, 2019). Comments were filed on October 31, 2019.

providers' ability to search, review and assess Form 470 submissions. In particular, SECA's language is an improvement over existing labels.² SECA's proposal also provides a clearer distinction between Internet Access and WAN Connectivity, which underscores the appropriateness of CenturyLink's proposal for an initial step where the applicant selects one of these options.³

The "flow chart" process outlined by SECA in Appendix 1 is not necessarily incompatible with a drop-down menu.⁴ A flow chart may be a helpful supplement to show applicants how the complete drop-down menu process operates. Steps one through three in SECA's chart are well done. The fourth step in SECA's proposal, however, falls far short.

Ensuring sufficient specificity for potential bidders

The second goal of Form 470 updates must be to improve the clarity of the applicant's request for service. SECA's proposal includes only "estimated bandwidth" and "estimated connections" – both at one amount "or greater" – and not necessarily separated by entity and site.⁵ That fails to provide "[s]ufficient information to enable bidders to reasonably determine the needs of the applicant," required by the competitive bidding rules.⁶ Already, under the current Form 470 process, too many applicants or applicant consultants utilize vague ranges of bandwidth; in its current form, SECA's step 4 would make that problem worse. Such a vague

² Comments of SECA at 3.

³ Comments of CenturyLink at 2-3.

⁴ Comments of SECA at Appendix 1.

⁵ *Id.* For Category 2 services, Step 4 of SECA's flow chart is similarly too vague, with only a minimum "estimated # of buildings" or "estimated quantity." Appendix 2.

⁶ 47 C.F.R. § 54.503(c)(ii).

range “does not describe the supported services with sufficient specificity to enable interested service providers to submit responsive bids.”⁷

The Commission needs to take steps to ensure Form 470s provide appropriate specificity. In particular, it should adopt USTelecom’s recommendation to include a tool in the drop-down menu to identify the eligible entity (or entities) and the specific location (or locations) where services are to be provided.⁸ Applications are required to include the exact locations of all affiliated eligible entities in the E-rate Productivity Center profile. Oddly enough, they are not included in the Form 470, where potential service providers would need that information. Applicants may include that information in their RFP, but some lack the specificity that service providers need to develop bids. In both cases, it makes it more difficult for service providers to assess opportunities. In the latter, it means providers must contact applicants to identify exact addresses before they can develop a potential bid – a needlessly costly and time consuming process that makes it impossible to respond to some Form 470s within the typical 28-day bidding window. Lack of information discourages service providers from bidding.

The Commission should direct USAC to modify the drop down menu process to add a list that would display the applicant’s addresses from its EPC profile, by eligible entity, so that the applicant can specify where services are to be delivered and at what quantity.⁹ The illustrations included with USTelecom’s comments show how readily that process can be done. CenturyLink also agrees with USTelecom that USAC also should update the Download 470

⁷ See Note to Paragraph (a), 47 C.F.R. § 54.503(a).

⁸ Comments of USTelecom at 2-3 and Appendix. USTelecom clarified further that entities just using the service from that host location should be excluded.

⁹ Comments of CenturyLink at 2-3.

Information tool to enable providers to display selected entities and locations selected by the applicant for each Form 470.¹⁰

Ensuring flexibility for potential bidders

On Form 470, applicants need to be specific about the *services* they wish to procure, including realistic bandwidth levels by individual site (not aggregated or in broad ranges) and the entities and locations to be served. Importantly, however, they should not be specific about *how* those services are to be provisioned.

In its comments, for example, CenturyLink explained that applicants should not dictate circuit quantities for circuit-based services on the Form 470.¹¹ Service providers need flexibility to determine the most efficient manner of provisioning service. They often can bid more cost effective options using a different circuit quantity, reducing costs for the program and potentially increasing competitive options for applicants.

Respectfully submitted,

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November 15, 2019

¹⁰ Comments of USTelecom at 3 and Appendix, Illustration E.

¹¹ Comments of CenturyLink at 3.