

September 11, 2015

VIA ELECTRONIC FILING

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

Re: **Notice of Ex Parte Communication**
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 September 11, 2015, I provided FCC staff with the attached analysis of FY2015 E-rate funding data and the responses to a nationwide survey of E-rate applicants conducted by Funds For Learning®. The information was provided to Jon Wilkins, Managing Director, Dana Shaffer, Deputy Managing Director, Lisa Hone, Associate Bureau Chief – Wireline Competition Bureau (WCB), and James Bachtell, Attorney Advisor.

Respectfully Submitted,

/s/ John D. Harrington

John D. Harrington

Chief Executive Officer
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**Universal Service Funding
Schools & Libraries Program (E-rate)**

E-RATE FUNDING YEAR 2015

**ANALYSIS OF
FUNDING REQUEST DATA AND APPLICANT SURVEY**

SEPTEMBER 10, 2015



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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 entities in the United States towards the purchase of goods and services necessary to connect students and library patrons to the Internet.

About Funds For Learning, LLC

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 Standards 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.

FFL first developed a formal, internal code of conduct in 2002; and, in 2004, FFL became the first E-rate consultancy to publish a code of conduct and to submit itself to public accountability in this manner.

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.

Executive Summary and Analysis

The E-rate program supports almost every school and library in America. Applicants can receive discounts of 20% to 90% on Internet access, telecommunications services, and on-campus computer networks. Discounts vary based on the services requested and the economic need of families in the community.

In 2014, the FCC instituted major changes to the E-rate program rules and began to implement significant updates to the management of the program. This report summarizes the FY2015 demand for E-rate support and provides a snapshot of feedback from a nationwide survey of applicants conducted in June of 2015. The purpose of this report is to provide E-rate stakeholders and policy makers with new perspective and feedback “from the field.”

Overview

In FY2015, there were 27,132 applicants for the reformed E-rate funding program. They requested a total of \$3.92 billion.

- The typical applicant submitted four funding requests totaling less than \$25,000.
- 48% of applicants have a 1:1 or BYOD initiative to support end-user devices.
- 65% of applicants describe Wi-Fi as an absolute requirement, but most have Wi-Fi networks that are 3+ years old.
- Applicants indicated that the E-rate application process took longer and was much more complex than prior years.
- 1% fewer applicants participated in the E-rate program than in the prior year.
- For the first time in the history of the program, the majority of applicants used a consultant.

CATEGORY 1 (“C1”)

Discounts for Internet access, leased data lines and phone service, collectively referred to as “Category 1”, totaled \$2.25 billion:

- The median school reported a total Category 1 expense of \$47.80 per student.
- The average E-rate discount was 77% for broadband services and 55% for voice services.
- Telephone service is the most frequently requested service and 86% of applicants express concern over its phase-out.
- 58% of applicants support a combined Category 1/Category 2 budget system that gives them spending flexibility.

CATEGORY 2 (“C2”)

In FY2015, E-rate funds were available for on-campus networks for the first time in two years. For many applicants, it was their first viable opportunity to receive discounts for the purchase, maintenance or operation of their local area networks. There were 10,588 applicants who took advantage of this opportunity, requesting a total of \$1.67 billion in discounts.

- 21% of applicants had never requested C2 support.
- 57% of sites did not request any C2 support in 2015, but most applicants expect to exhaust their C2 budgets by 2017.
- An estimated \$4.9 billion in C2 budgets remain available for use in FY2016 through FY2019.
- Two-thirds of applicants believe the current C2 budget cap is insufficient.
- 37% of applicants think that a \$250-to-\$350 per student C2 budget would be sufficient to meet their needs.
- Network switches and routers were the most sought after C2 discounts, representing 41% of the overall C2 demand.
- Discounts for the new “managed Wi-Fi” service represented 2% of the overall Category 2 demand.

FUNDS FOR LEARNING ANALYSIS

Applicants are nearly unified in their concern over the loss of support for telephone service. This is tempered by plans to use significant amounts of Category 2 funding in 2016 and 2017. Given the recent changes, it is not surprising that applicants rank the program as more complex and time-consuming. As the program moves into 2016, the FCC should

- Monitor if more applicants opt out of the program,
- Consider either raising the C2 budget cap or implementing a unified C1/C2 budget cap, and
- Identify ways to reduce the administrative burdens placed on applicants.

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 27,100 applicants and 5,400 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 data¹ as well as a nationwide survey of applicants conducted in June of 2015.

This report is not intended to be an encyclopedic review of the program. There are many additional statistics and reports that could be presented². 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.

¹ Data is current as of August 30, 2015. Data compiled using the Funds For Learning® E-rate Manager® service.

² Many of which Funds For Learning has prepared and submitted in the past. See for example:

<http://www.fundsforlearning.com/docs/2014/05/FY2014%20School%20Applicant%20Demand%20Analysis%202014-05-16.pdf>

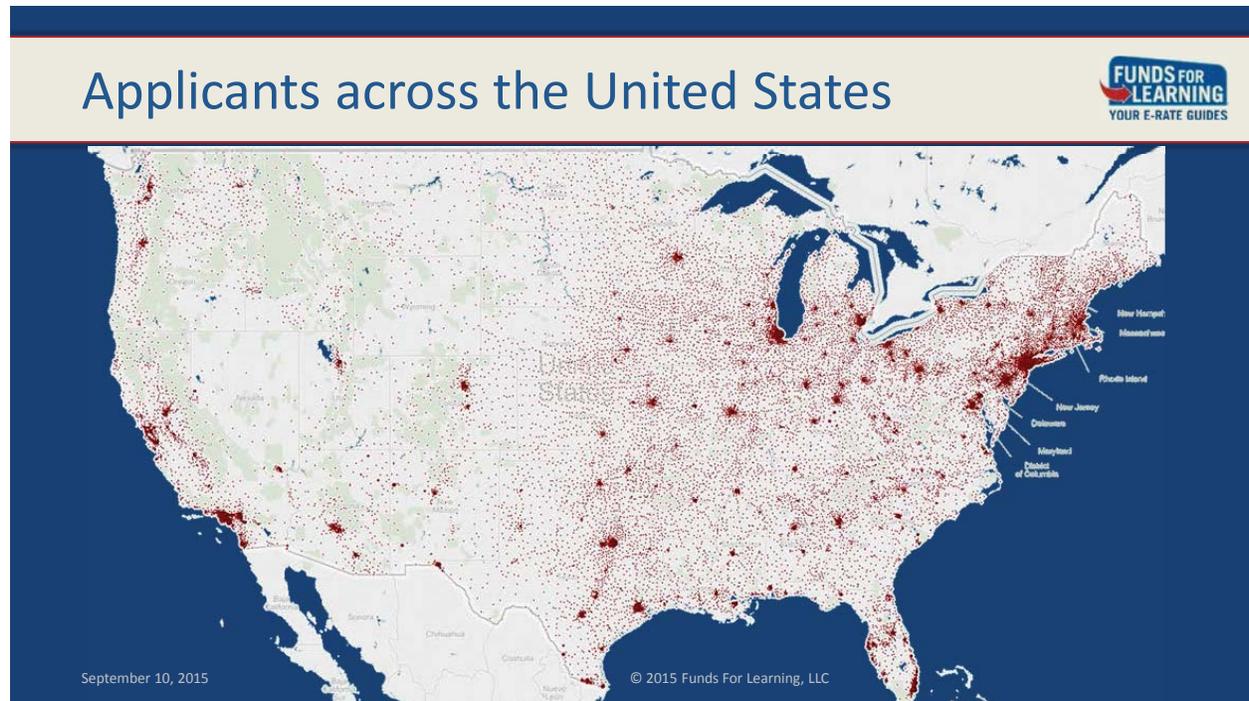
Looking at the 2015 Request Data

In 2015, applicants submitted applications from every state and territory within the United States, representing:

- 53,727,951 students (including 14,606,727 rural students)
- 116,132 school buildings (including 41,759 rural school buildings)
- 11,578 public library facilities (including 5,622 rural library facilities)

Funding Data

139,831 funding requests were submitted for FY2015. These requests were submitted by 27,132 applicants, on 48,141 FCC Form 471 applications, with 385,044 lines of service details. The analysis provided in the report is based on the entire population of FY2015 funding requests.

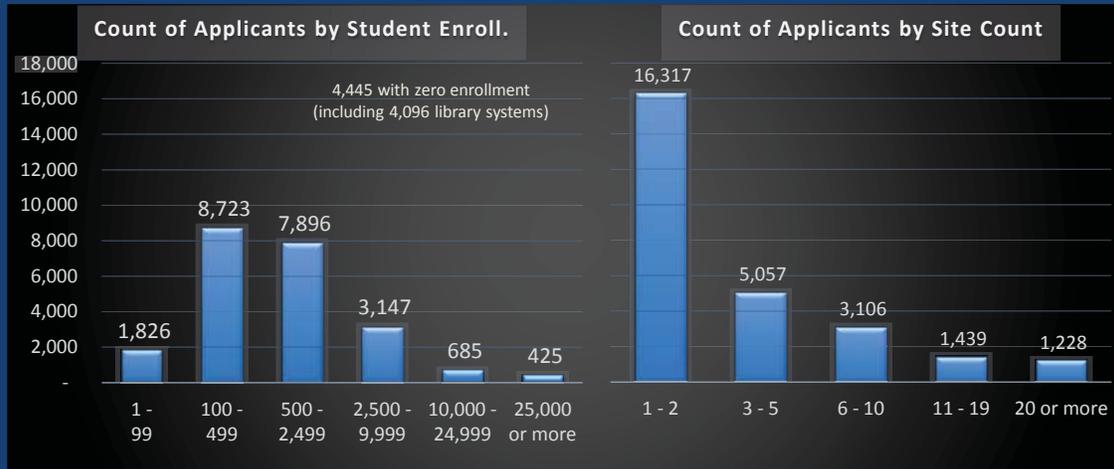


The average individual school applicant has an enrollment of 443 students with 1.3 buildings. The average school district applicant has 7,510 students and 13.5 buildings.

	Applicant Count	Avg. Student Count	Avg. Number of Sites
Individual school applicant	8,483	443	1.3
School district applicants	13,980	7,510	13.5
Individual library site	3,257	n/a	1.0
Library system	839	n/a	8.0

To calculate their Category 2 budget caps, library applicants provide the square footage of their facilities. The median library square footage is 4,146 square feet.

Most Applicants: <1,000 students; 1 or 2 sites



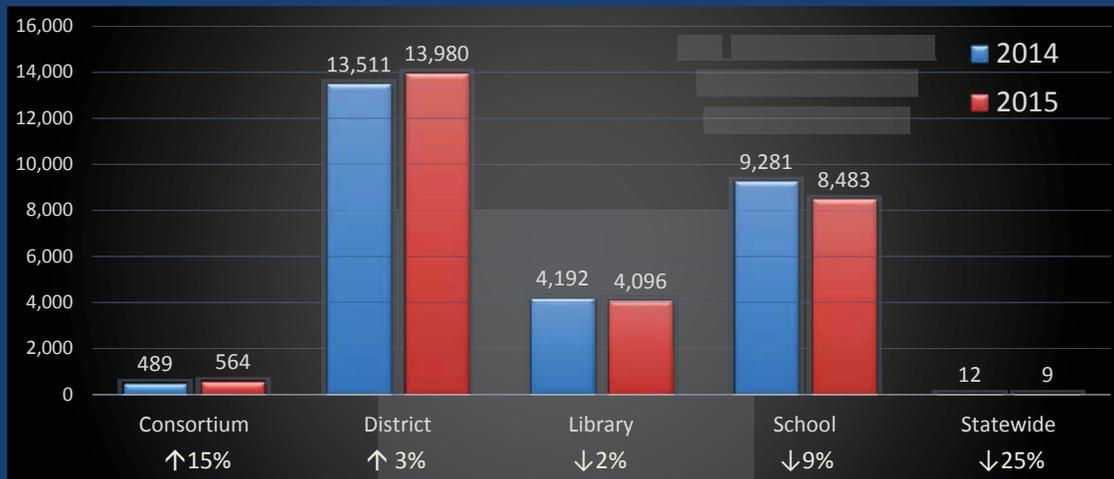
September 10, 2015

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Participation

There were 27,132 applicants in FY2015. This represents a 1% decline in participation from FY2014. The decline came from individual schools and small libraries who chose not to continue participating.

1% Decline in Applicants Overall

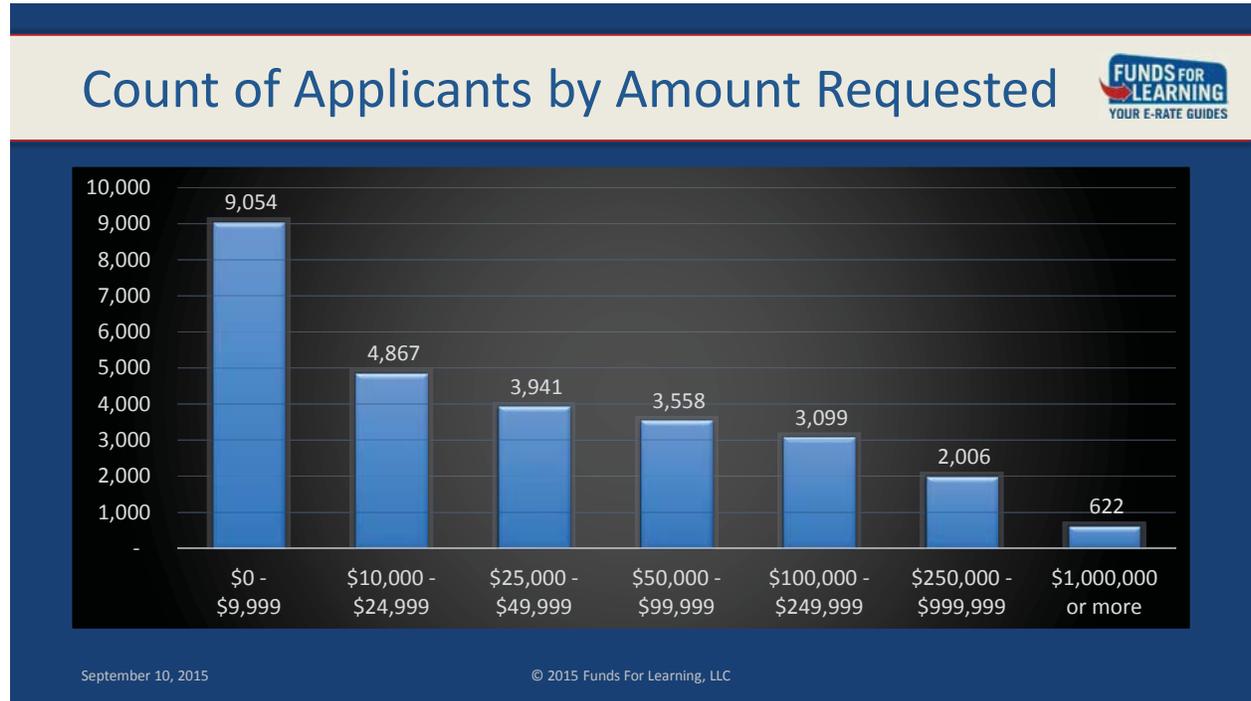


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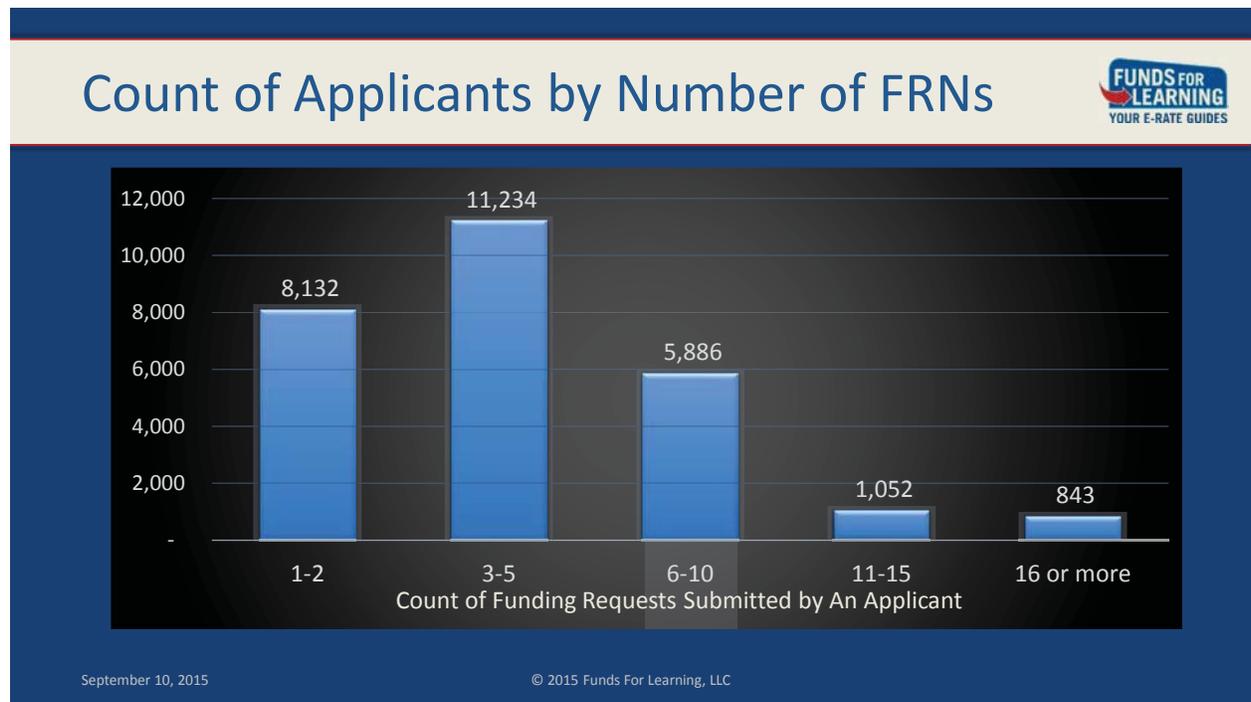
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Applications

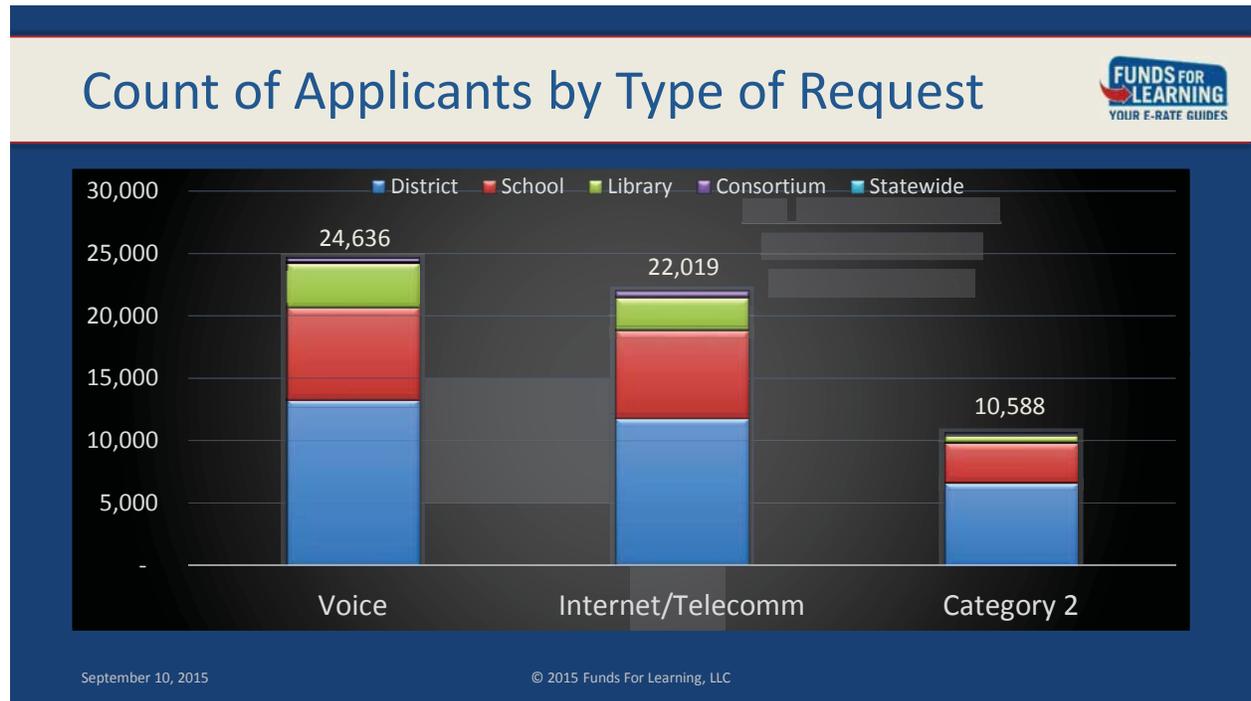
The majority of applicants (13,921) request below \$25,000 per year in support.



The median number of funding requests submitted by an applicant is 4.

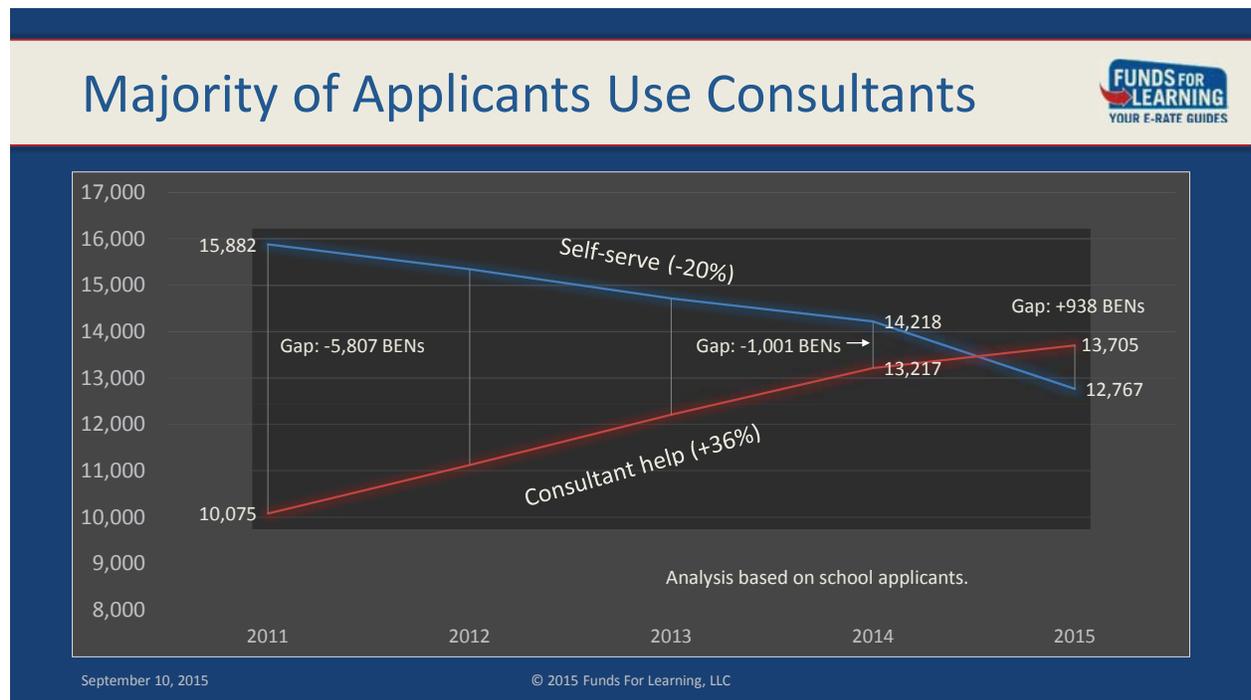


Of the 27,132 applicants, 91% submitted funding requests for voice telephony services, 81% for Internet access and data lines, and 39% for Category 2 services (e.g. Wi-Fi and other internal connections).



Use of Consultants

Over the past five years, there has been a 36% increase in the number of applicants who rely on consultants to prepare their E-rate applications. In 2015, for the first time, the count of school applicants using consultants outnumbered those not using third-party help.

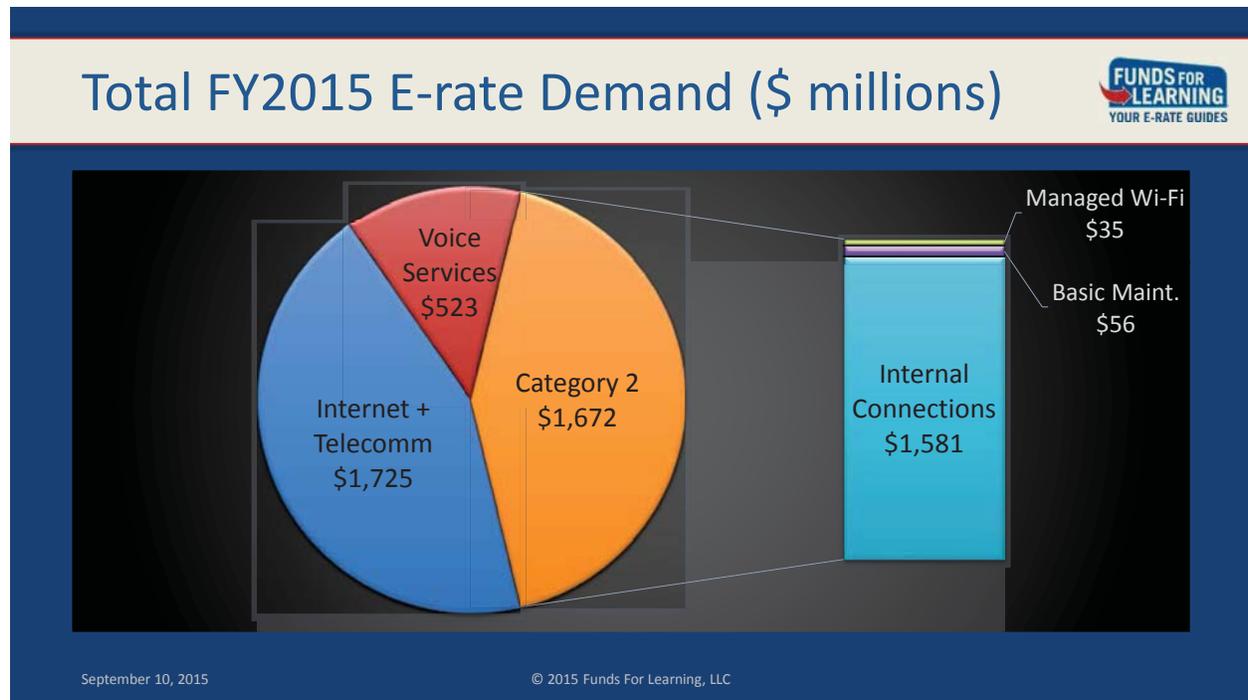


Total Demand

Applicants submitted expenses for goods and services totaling \$5.37 billion, towards which they collectively sought \$3.92 billion in E-rate discounts.

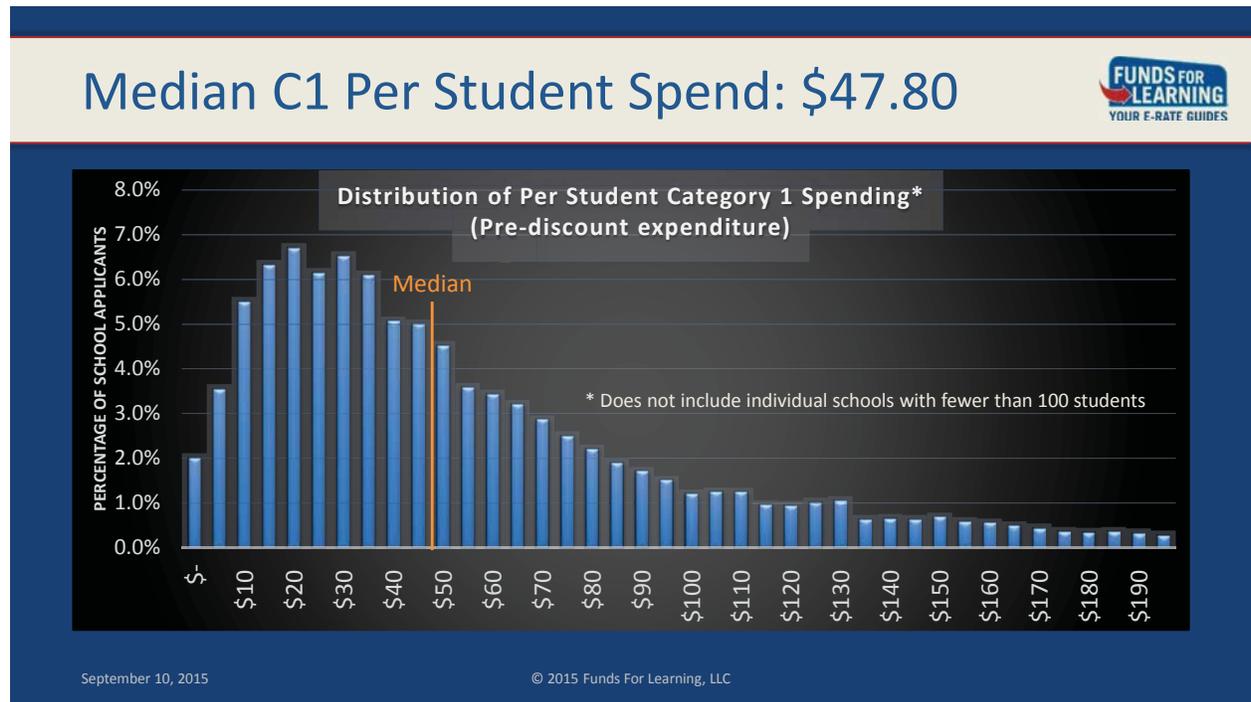
	Leased data lines	Internet	Voice services	Total
Pre-discount Total	\$1,178,803,769	\$1,078,990,038	\$945,349,877	\$3,203,143,683
E-rate request	\$906,116,849	\$818,890,832	\$523,415,207	\$2,248,422,888
Count of Applicants	6,408	19,739	24,594	26,460
Avg. Discount	77%	76%	55%	70%

	Internal Connections	Basic Maint.	Managed Wi-Fi	Total
Pre-discount Total	\$2,052,280,645	\$66,554,291	\$44,342,525	\$2,163,177,461
E-rate request	\$1,581,183,860	\$56,341,758	\$34,908,123	\$1,672,433,742
Count of Applicants	9,284	2,487	1,212	10,549
Avg. Discount	77%	85%	79%	77%



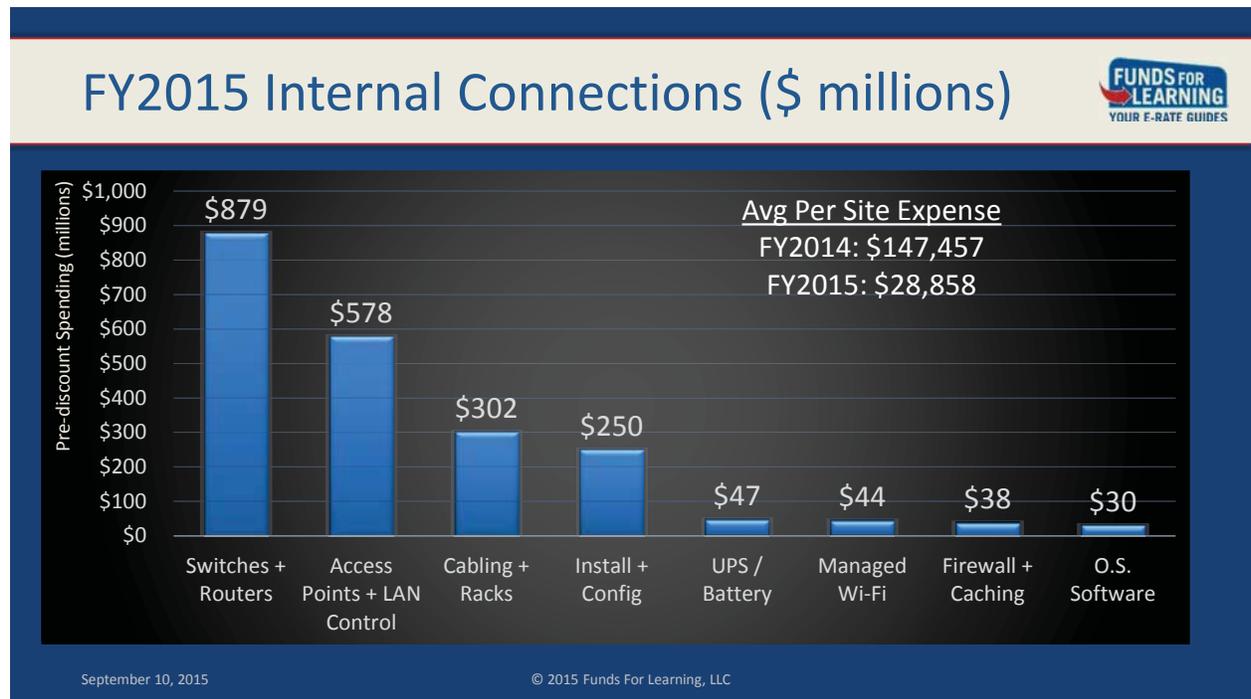
Per Student Demand for Category 1 Services

When reviewing the total expense for all Internet, telecommunications, and voice services, the majority of schools spend less than \$50 per student annually.

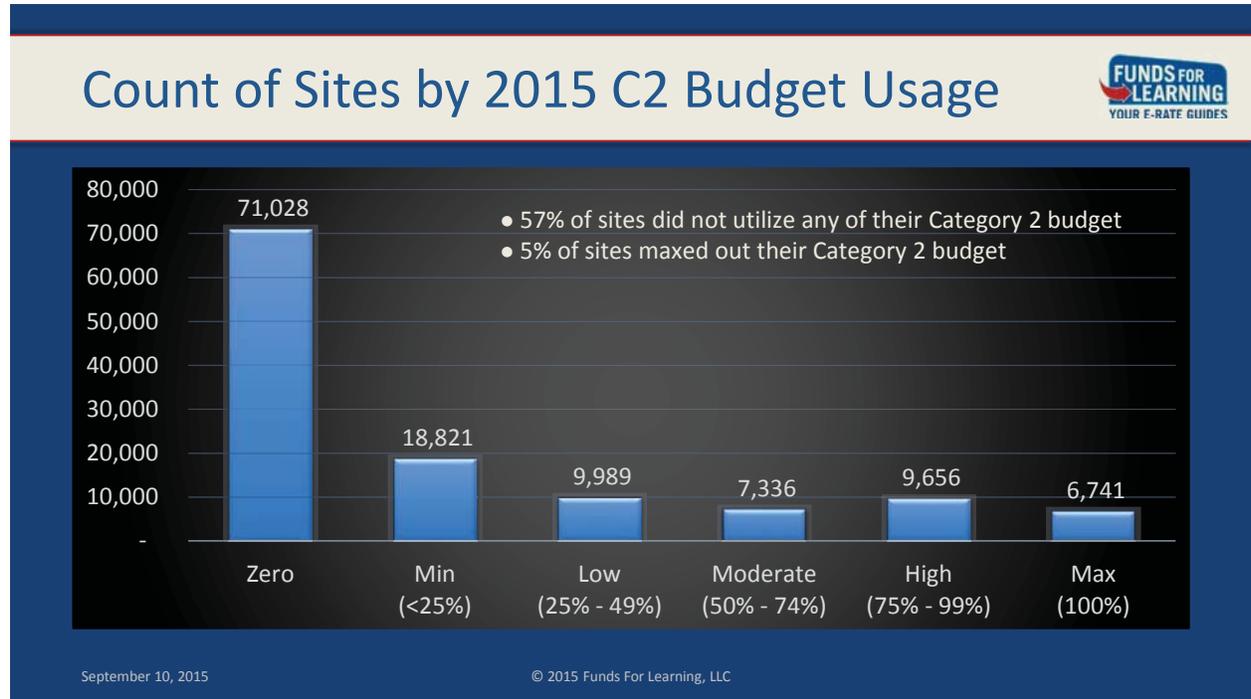


Demand for Internal Connections

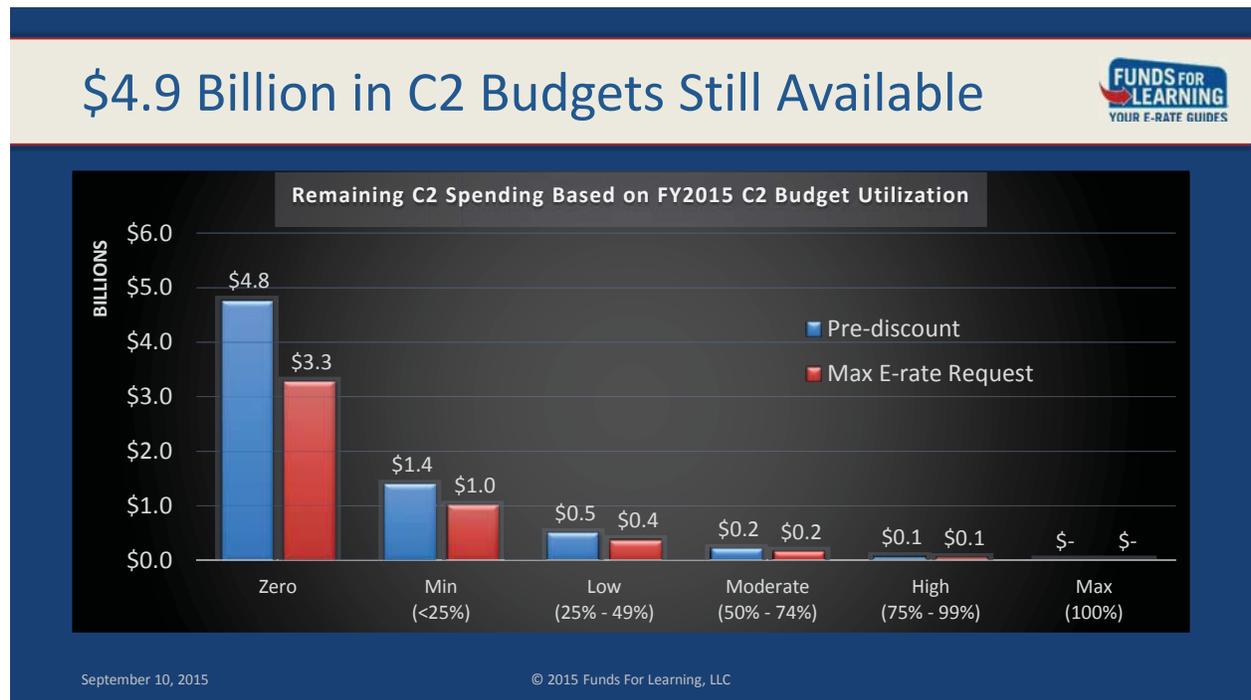
Applicants reported \$2.167 billion in internal connections projects and requested \$1.639 billion in E-rate support to complete these projects. Demand was greatest for switches and routers (\$879 million; 41%), Wi-Fi equipment (\$578 million; 27%) and data cabling (\$302 million; 14%.)



57% of sites (71,028) had no Category 2 funding requests associated with them. 15% of sites (18,821) used less than 25% of their Category 2 budgets. 22% of sites (26,981) used 25% to 99% of their Category 2 budgets, and 5% of sites (6,741) used their entire Category 2 budget.



Assuming that all eligible sites utilize their entire Category 2 budget by FY2019, there is a potential for \$6.97 billion in additional Category 2 projects, representing a total of \$4.90 billion in E-rate discounts.



Applicant Survey Responses

In June 2015, Funds For Learning conducted its fifth nationwide survey of E-rate applicants. Information was gathered regarding the use of technology by applicants, their need for E-rate support, and the E-rate process in general. Information was also collected about the respondents themselves. There were 652 responses, representing about 3% of applicants. The responses were from a representative cross-section of E-rate applicants. NOTE: Responses were gathered prior to USAC's launch of the EPC system.

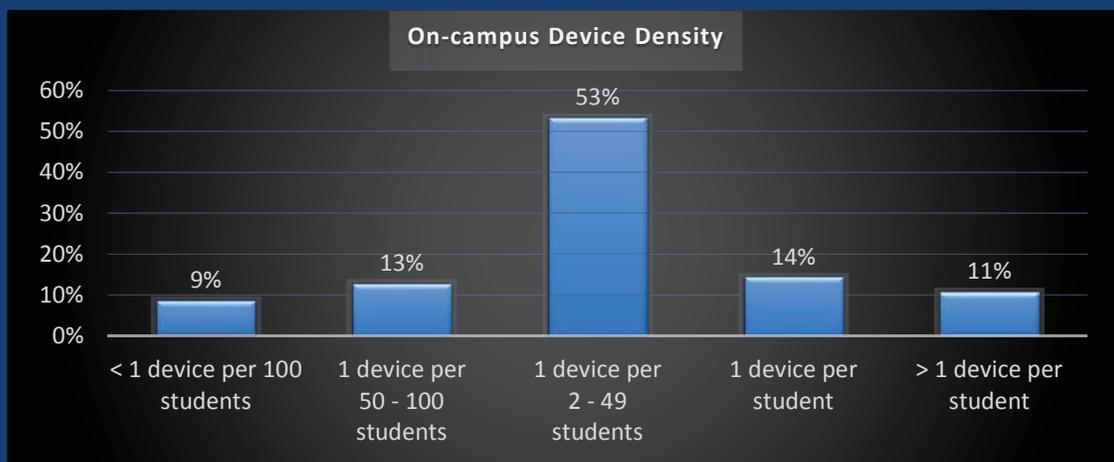
- 652 responses
 - 408 (63%) provided identifying information
 - 244 anonymous
- Applicant type nearly identical to actual universe of FY2015 applicants
 - Schools: 86% of respondents (actual based on 471 data = 85%)
 - Libraries: 14% of respondents (actual based on 471 data = 15%)
 - Rural: 63%; Urban: 37% (skews slightly more rural than actual form 471 data)
- Enrollment ranges from 50 to 100,000+

The response rate to this survey is similar to other national applicant surveys conducted by Funds For Learning, the FCC, and other groups. A copy of the survey is included with this report.

Applicant Use of Technology

48% of survey respondents indicated that they had some type of 1:1 laptop/tablet initiative or that they supported a Bring Your Own Device (BYOD) initiative. When asked about the number of devices their network currently supported, 53% of respondents reported 1 device per 2-to-49 students. 25% of respondents reported that their networks supported 1 or more devices per student.

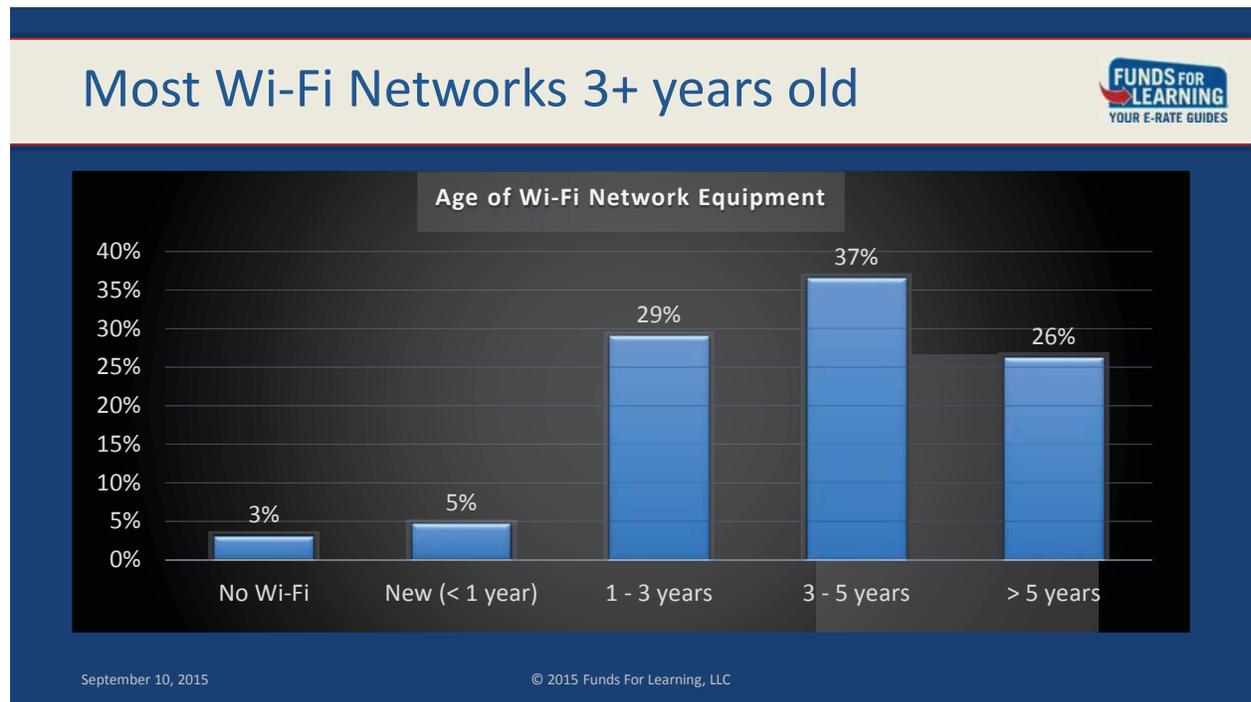
48% report 1:1 or BYOD usage



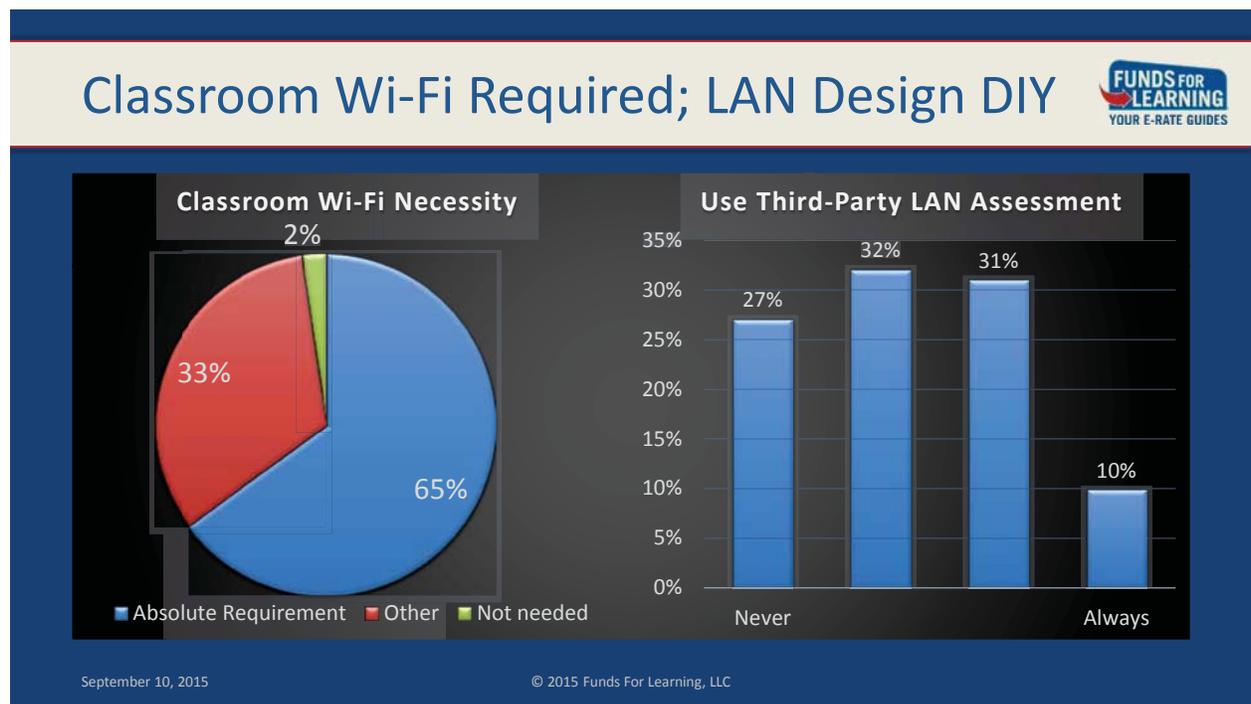
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When asked to describe their Wi-Fi network, the majority of respondents (37%) indicated that their network was 3-to-5 years old. A quarter of applicants (26%) report Wi-Fi networks more than 5 years old.

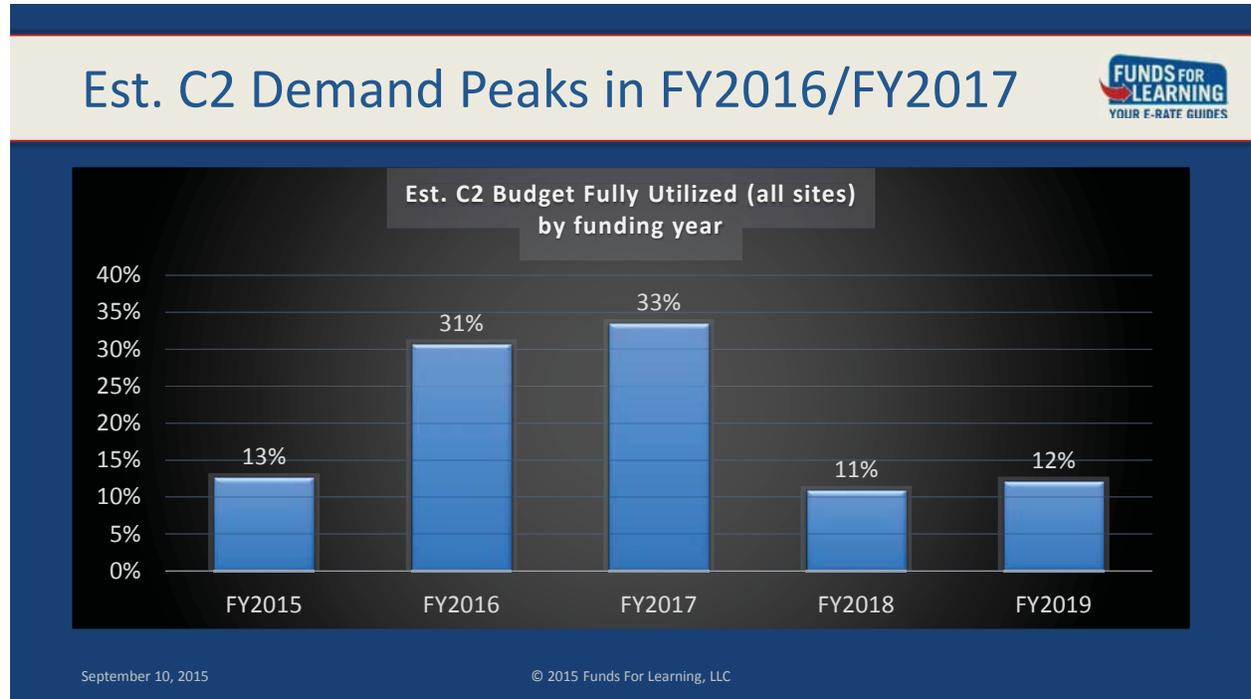


65% of applicants rated classroom Wi-Fi as an “absolute requirement.” A quarter of respondents (27%) indicated that they never rely on outsiders to assess their local area network (LAN) requirements.

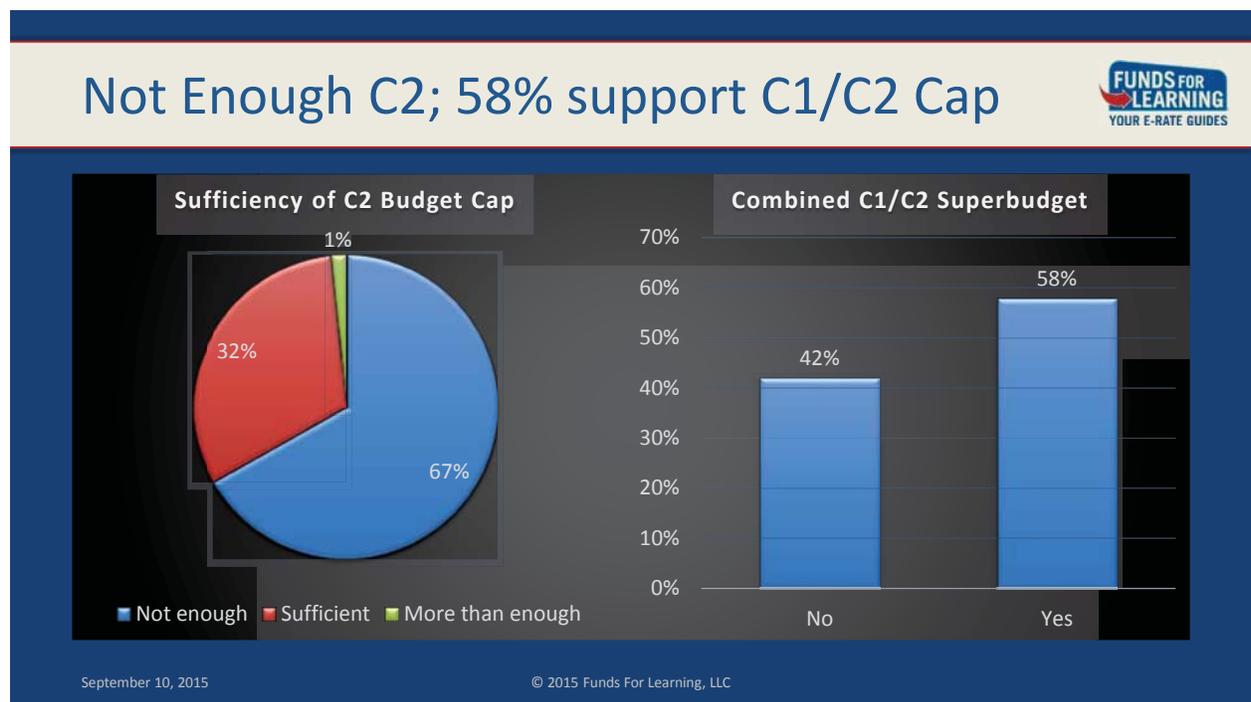


Demand for E-rate Support

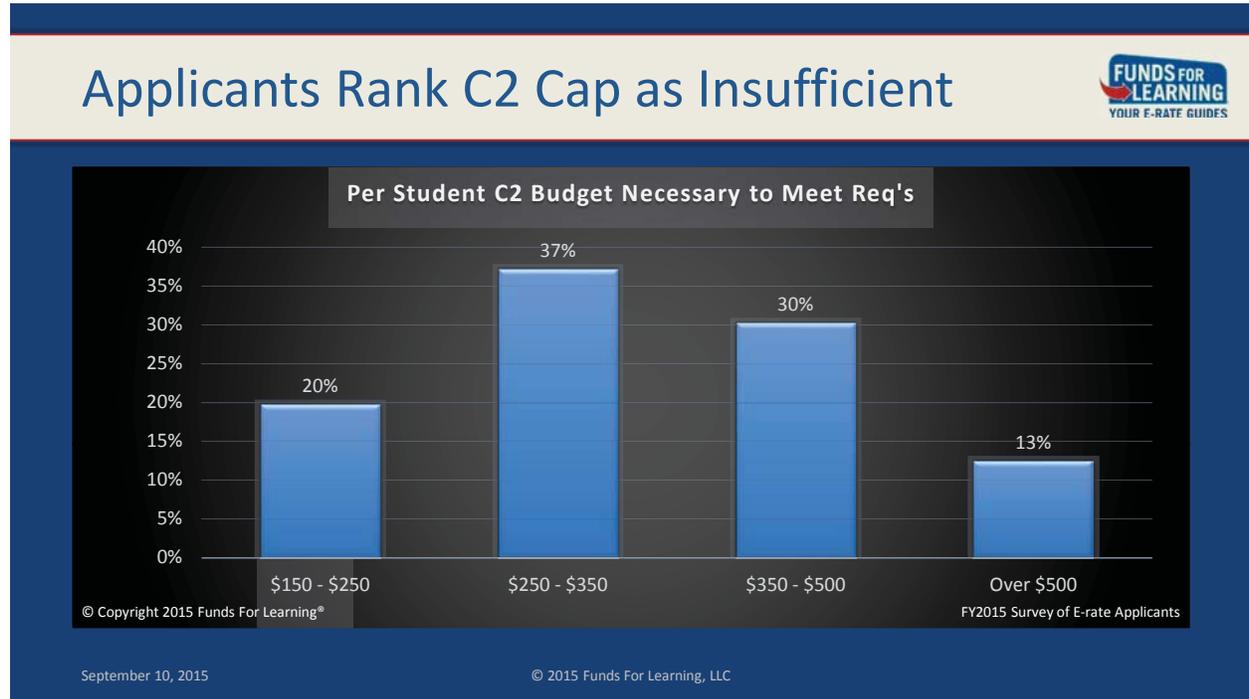
48% of respondents indicated that their organization had never before received Category 2 (formerly Priority 2) discounts. When asked to estimate in which funding year they will exhaust the Category 2 budget at all of their sites, the majority (64%) indicated FY2016 or FY2017.



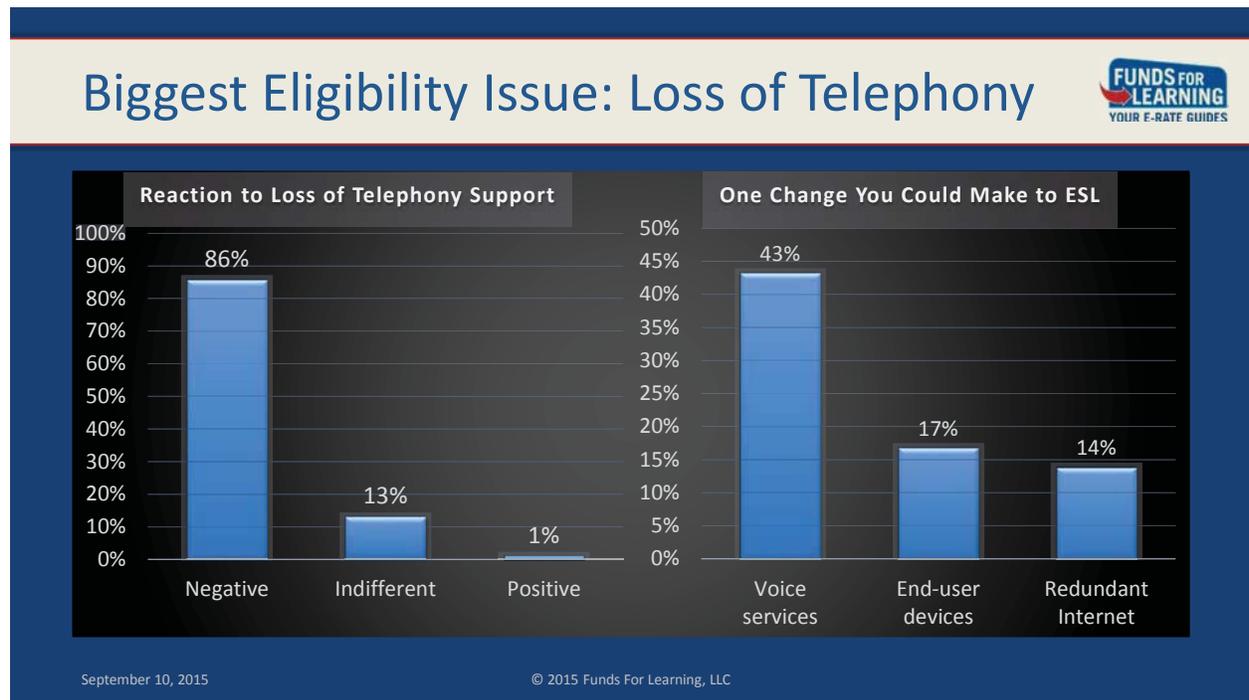
67% of respondents indicate that the current Category 2 budget cap is insufficient. 58% of respondents would support a combination C1/C2 budget cap allowing applicants to prioritize their E-rate dollars.



When asked to select an adequate C2 budget cap, 37% of applicants indicated that a \$250-to-\$350 per student cap would suffice to meet their requirements.

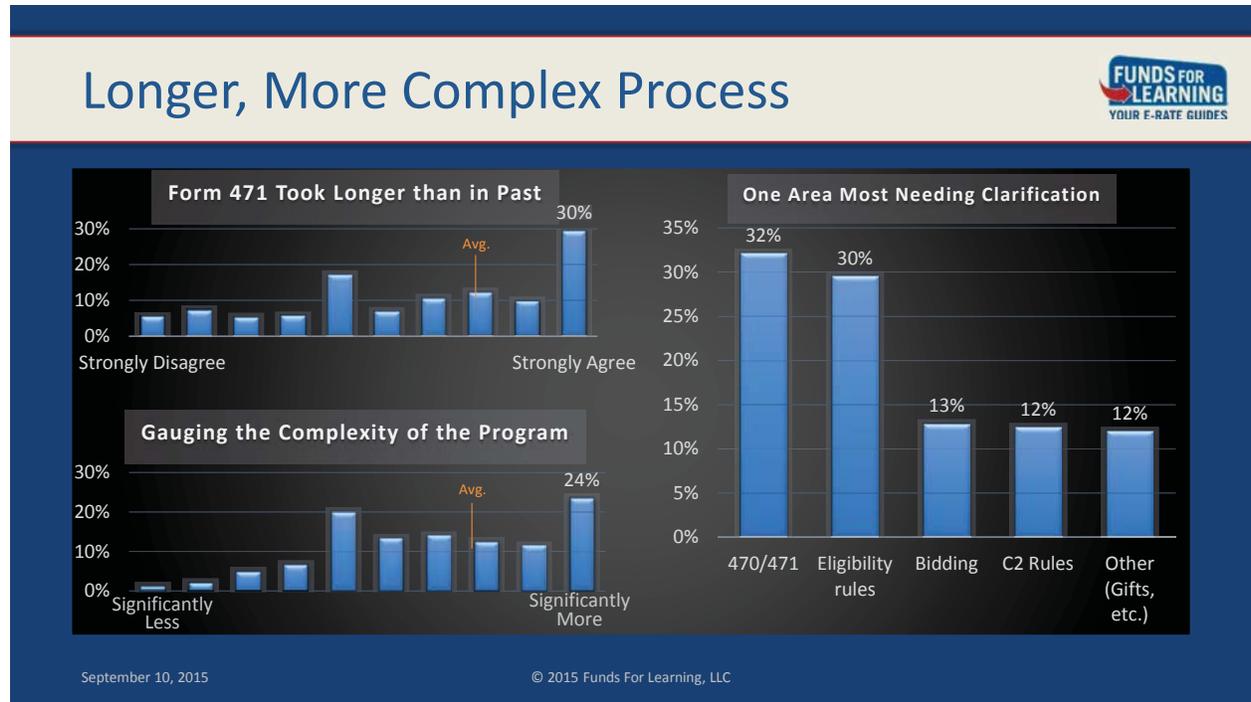


86% of respondents are against the decision to end support for telephony. When asked to describe the one change they would make to the eligible services list, 404 survey respondents offered their opinion: restore telephony discounts (43%); add end-user devices (17%); and allow backup Internet access (14%).



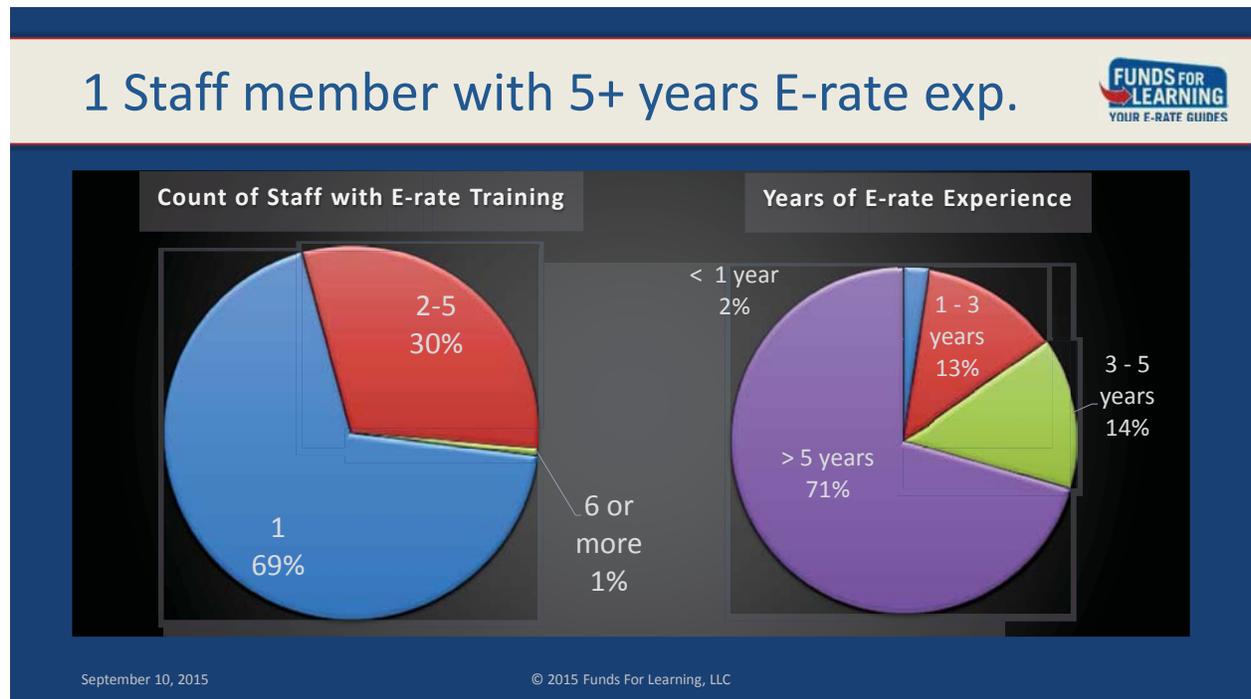
The E-rate Process

30% of respondents indicate that the Form 471 application process took longer in FY2015 than in prior years. 24% of respondents rate the process in FY2015 as significantly more complex than in prior years. The two areas most needing clarification are the 470/471 application process and the eligibility rules.



Respondents

The vast majority of applicants have only one person on staff who has received E-rate training. In most cases, this person has more than five years of E-rate experience.



Survey: Open-ended responses

Survey respondents were asked to provide written feedback about the program in general, eligible services, aspects of the program needing clarification, and the idea of a single budget cap. Only identifying information, such as a school name or email address, have been removed from comments.

General Feedback

116 substantive responses were received. Of these responses:

- 26% asked that the E-rate process be simplified
- 21% were positive about the direction of the program
- 7% indicated that funding for voice services should be restored

1.	471 survey was very time-consuming, and confusing. I got conflicting answers from the help line and a news brief on part of it.
2.	Applying for Category 2 is useless for this Intermediate Unit because all of our core equipment is housed in our Executive Office, which is not considered an instructional facility.
3.	I am last one in the district who hasn't quit. Please send me the survey results.
4.	As a small district, we still need the Cat 1 assistance that was discontinued.
5.	Bring back our discounts for voice-we need that more critically than funding for the internet cost. We cannot have out internet service without a phone line but you won't help us pay for the phone line to have the internet-makes no sense.
6.	Can you make outdoor wifi on the roofs of school buildings priority 1 to limit the digital divide in school districts? Also please fund telephone bills for school districts.
7.	Despite the complications this has been a worthwhile program for this library as it frees funds to help us increase bandwidth periodically (as it is available) which helps everyone who uses our WiFi and public computing services
8.	Don't cut voice services. Internet is crucial to the future, but voice services are not going away. We need this help.
9.	Educational Service Centers rely on eRate funding to assist us in assisting schools and working with students who are in difficult circumstances. By nature our population is smaller with the same needs as a district - maybe more so - to provide a secure, safe environment online but enable each student access. I certainly appreciate any funding we receive from eRate but wish we could have a balancing of our needs. We actually went up to close to 95% Free and reduced lunch but lost funds to 85% plus lost funds with category 2. Living in the unknown for technology funding is difficult to plan. But thank you for asking our thoughts!
10.	E-rate is a good idea/program. I long for the day when the funds can be depended on and budgeted to help bring the needed infrastructure in place to ALL schools nationwide.

11.	ERate is a great program. But there is a lot of red tape and when you are denied year after year, it sometimes isn't worth it. Sometime I have not even bothered to file or wish it would just be discontinued and have the taxes on our phone bills removed. It's a lot of work to plan and file for eRate and get no ROI for years.
12.	Erate is an essential part of our technology funds; without it we would likely have a much smaller and older network. Being able to do an aggregate for C2 would make planning easier, especially with the new rules. We have some sites that are current while others need a full replacement, so some funding isn't usable while others aren't adequate.
13.	E-Rate is the major support funding for rural school districts, without this funding students in rural school districts would be left behind when it comes to compete globally.
14.	FCC and USAC were supposed to streamline and make the whole process easier. The process has become longer and more drawn out as a result of the "new" way of doing things. The 471 should have more template or file importing available. Too much time is spent online having to change items after a too basic template is imported. We should be able to put all of our detail work into spreadsheets for import into the system. This means less time online and less stress on the system. The application print function needs to be updated. Under the application display option, I had to click every "+" sign so that all information was displayed before clicking the Print button. Otherwise, I only got the section header and basic information. On the positive side, I did not experience any loss of connectivity which was always happening with the previous system. Another positive is that every screen change included an automatic progress save.
15.	FCC changes in phone service fees is going to negatively affect all school districts and take money away from other technology that is needed. This was an extremely poor decision by the FCC showing their lack of knowledge in Information Technology.
16.	[Consulting firm] is invaluable. And very courteous.
17.	For the past three years the library has used a consulting firm.

-
18. Funding from E-Rate is critical to maintaining technology in our classrooms. Funding for Priority 1 services should always support voice and data circuits. To lose voice funding has hindered our technology deployment and maintenance.
-
19. Glad to have access to Cat II funds now. Unhappy about dropping phone funding.
-
20. I am a consultant for about [#] districts in [state] and I would definitely like to see the Form 471 print preview option available again. It was difficult to try and figure out a way to get the info to the districts for their review. Also, would be nice if a general form/spreadsheet could be available to all vendors so they can fill out the Category 2 info and supply the district with a quote and that spreadsheet that is already completed can be uploaded into the Item 21 of the Form 471. The Category 2 Item 21 process was very time consuming and seems silly to have to enter data twice.
-
21. I am glad E-Rate was updated and a category 2 budget was created, but it would have been nice to have everything in black and white at the beginning instead for part way through. I also did not like the extension. The FCC should have just made the window longer at the very beginning. Finally, I also found it strange that they said you could have a contract date of 4/1/2015 on Category 2 equipment, but when you fill out your form 486, all you can choose is 7/1/2015.
-
22. I am shocked that you actually believe you will get useful information from this survey. For example, there is only one area that I feel weak on and that is the various audits because they change for each auditor. The correct ranking for those 7 statements would have been a 1 for 6 and a 3 for the audits. As is, it looks as if I feel I am more competent with some than others which simply is not the case. I got C2 funds for all of my schools but did not go over budget at any of them. That was not a possible response. In fact, I can think of a couple of possible responses that were not included. The complexity of the 471 is due ONLY to the fact that the Item 21 data is now included there and not separately like before. If you consider the 471 without the 21 data, it was really much easier and the interface was much better. The increase complexity is nearly all due to the fact that we are now having to give detailed purchase information that will allow for much better openness and will allow for better data driven decisions by the FCC. This is WORTH the extra effort. They still need to tweak the questions involving fiber connections if they want to find out which buildings are connected via fiber. As is, even though the information will be much better than before, it is still going to be grossly inadequate for what they really need regarding fiber connections. For example, I do not use leased fiber. I purchase bandwidth from my provider via Ethernet connection. It is fiber but it is NOT leased fiber as defined in the ESL for 2015. So there is no record that my services are provided via Fiber Optic cable, which is what they seem to want to know. A simple question saying the type of connection (fiber, copper, wireless) would get them what they want.
-
23. I am so glad a program such as this exist, but it is still very time consuming and the late-night hours to really get things together has not resulted in the hope-for goal.
-
24. I answered the Wi-fi questions based on the needs of the individual member districts in the consortia, as my office does not have wi-fi
-
25. I believe that the paperwork is confusing for most people and there are multiple opportunities to make mistakes.
-
26. I feel that it's ridiculous for schools to feel compelled to hire an outside consultant in order to maximize their funding and reduce audit risk in order to provide such a valuable service to our students.
-
27. I feel that the program has been damaged by the rule changes. Other districts can afford the equipment and if they do not get funded they simply purchase it with other funds. We do not have that option. If we cannot get C2 funding, we simply cannot get what we need.
-
28. I have found the SLD web site difficult to use with some browsers.
-
29. I have planned to discontinue applying for erate. too time consuming, and missed too many funding opportunities due to complications with the application process
-
30. I have talked to many library directors and we all agree, filing this year took a lot of time and was very frustrating.
-
31. I much prefer to fill out the form on line than to use the interview method.
-
32. I recommend that Billed Entity Numbers (BEN) not be changed without the permission of the organization contact; also, I recommend that there be an alternate person available in the event the organization contact is not available. Thanks.
-
33. I think all money that is not used at the end of the year should go back into the fund so other libraries can use the money instead of it going back to the government.
-
34. I think that the telco decision will negatively impact the amount of funds that school districts will be able to use for technology in the next two years...also --there should be a C2 district-wide budget instead of individual school site budgets
-
35. I think that more of the focus needs to be on securing the Preferred Master Contracts that were mentioned in the modernization. If USAC procured a large number of these contracts for both Category One and Two services it could save our district a lot of time and money. The ability to just purchase good and services that E-rate has already determined to be eligible without having to go through the competitive bidding process, and worrying that something was not completed right, would make a huge difference. It would really take a lot of stress out of this process.
-
36. I tried to answer in a representative way for our client schools and libraries.
-
37. I wish that there was a distribution based on F&R lunch numbers that avoided all the forms and such. I feel so much is wasted on administration than would be wasted on misspent funds. There would need to be some basic guidelines and accountability but much more streamlined than the process we have now. Right now I am waiting on my FCDL on 6/18/15. We have contracts ending on June 30 and contracts that are based on an FCDL to begin on July 1 and we don't have that FCDL yet. Very frustrating.
-
38. I wish they would simplify the process. It is so frustrating!
-
39. I would like to have a way to submit RAL corrections online such as uploading a scanned file, instead of having to fax or mail them.
-
40. I would like to know why so many people have free cell service using these funds. The abuse of this program seems to be astronomical and it continues to pull millions from the pot. That part of the system needs to be overhauled and made more difficult like the schools and libraries part was. It is really discouraging to even try to work with the program any more.
-

-
41. I would really like to see E911 services covered by erate before I lose the service. Thank you.
-
42. If set the fix amount per student, shorten the time for PIA review and other paper work.
-
43. I'm new to this position and didn't know the answers to most of your questions.
-
44. Impoverished Rural schools need funding to help pay for voice services.
-
45. In the past I was able to file as a district and receive funding for the whole district. This really helped us a lot because we have a couple of schools in our district that are rather small and a couple that are a little bit bigger. This allowed me to get needed equipment and services to all our schools. The new rule where we can only get so much per student per school does nothing but penalizes smaller schools because they do not have enough students and therefore can not receive the same technology updates as the bigger schools. We have 2 schools that we were able to get almost all the technology funding we needed and we have 2 schools that were not able to get much of anything. In my opinion I think this rule needs to be looked at again and changed back to where a district can decide where the money needs to go.
-
46. It is not logical that in this age when technology is ever changing and becoming more complex, the financial support to schools to keep current with technology is being reduced. We need to get our priorities straight.
-
47. It would simplify all paperwork if a Single amount per student was applied and we choose any spending method.
-
48. Just want to reiterate how the eligible services changes have negatively impacted our budget. Voice services are necessary so we now have to find additional money for those funds lost. Also, with the narrow focus on connectivity including wireless, we have little need at the present since we have funded wireless installs with local monies. With the funding mechanism at \$150 per student, this does not allow us to complete necessary infrastructure upgrades since all schools require the same infrastructure regardless of the number of students.
-
49. Looking forward to additional fixes / functionality of the application filing system.
-
50. Many of the questions in this survey do not apply at all to libraries, even though we use the program, to. And apparently, school libraries are no more important to you than public libraries are.
-
51. Many of these questions were designed ONLY for schools. Public libraries operate year-round and have demands year-round. Voice and telecommunications needs are very different for schools and libraries. Schools DO NOT EQUAL Libraries; Libraries DO NOT EQUAL Schools.
-
52. More Training videos on how to fill the forms out. I feel this slows down the review process because we have to keep submitting documentation that we either didn't know it needed or put it in the wrong place.
-
53. My library covers a whole county and we have facilities in rural areas with higher poverty rates than our main library. The new rule that sets discount rates based on the school lunch data from one building hurts those whose main location (with the smallest % of population) is more prosperous than the branch locations (with the largest % our service population).
-
54. Need simpler way to segregate schools in item 21 in the C2 471 process. This year we had to create separate FRN for each school. Would be better if Item 21 Excel Template allowed for school designation so one FRN could be used.
-
55. Once an entity (school or library) has become part of the eRate system, please please streamline as much as possible. I realize we are being granted a benefit -- and we are grateful to the FCC -- but it feels like there could be greater simplification. Thank you.
-
56. Open-Ended Response
-
57. Our rural lbrarry would very much appreciate the continuation of voice service funding.
-
58. Over the years it seems that every time changes are made like this the smaller schools are the ones that loose and this is exactly what happened. The bigger the school the better they are able use funding like R-Rate to take the place of funds used giving them more options. When we, smaller schools loose funding we have to choose what we can no longer live with and usually that is a very hard decision.
-
59. Please bring back voice supplementation even if it is at a reduced level.
-
60. please don't change rules mid-year there is no way to plan or trust erate program if you allow mid-year no notice changes to how you handle decisions
-
61. PLEASE emphasize and lobby for the return of TelCo funding.
-
62. Please make it easier to apply.
-
63. PLEASE MAKE THE FORMS SIMPLER
-
64. Please reinstate support for voice services. They are critical to the safety of our students.
-
65. Please restate all voice services.
-
66. Program currently has a false sense of being adequately funded. Sites cannot be funded on per capita basis... doesn't make sense. Funding must be based on the size of the site and then the population served. Flawed decision to remove support for voice... Added enormous expense to the user base and circumvented many districts from having adequate matching funds to successfully apply for C2 funding.
-
67. Public libraries in high-poverty rural areas need a bigger piece of the E-Rate pie
-
68. Rural internet should not cost what it does. It costs this district \$17,200.00 per month before discounts for a 100Mbit connection. Maybe when all these paid for prices are made public knowledge this will change.
-
69. Schools, Libraries and Hospitals should be exempt from E-Rate fees
-
70. Small libraries in rural areas have limited options. We feel lucky to even have reasonably fast internet and wi-fi capabilities. The loss of voice-only funding is a huge blow, as most libraries outside of large urban areas cannot afford the equipment or services for unfiltered internet. As costs for internet service keep rising, keeping rural libraries and patrons online may well depend on e-rate access being available to those without unfiltered internet services. We have no I.T. help, limited budgets for computers and equipment, usually one option for internet service (specialized systems are too costly, not available, or problematic), and are perpetually underfunded. We have 5 computers available for patron usage as well as wi-fi and have well over 3000 internet users per month. The costs to maintain our systems and pay for that amount of broadband is a huge strain on our system. Adding in additional costs and time concerns for a filtered system is not even an option.
-

-
71. Some [state] ISD are misusing the program by creating collaboration with vendors for fiber that causes conflict of interest when bidding for internet services.
-
72. State Erate Coordinator keeps me updated with the process and assists us and all schools in the state with application process at no charge..
-
73. t/I wish all schools were funded for cat 2 and did not have to match at 50%. My 50% schools still cannot afford to upgrade their networks and wireless. the total projects amounts to over \$60,000 and matching \$30,000 is not affordable. I wish there was just an amount available and we could do as much of the project as we can with those funds.
-
74. Thank you for managing this very complicated service. It has helped the school district all over the US tremendously.
-
75. thank you for the service. Please reconsider the decision to discontinue voice.
-
76. Thanks [consulting firm].
-
77. The biggest change we can advocate for would be an increase in the 150 per student cap. We should really shoot for a \$250 to \$350 per student cap.
-
78. The changes in the form did not simplify the process, but made it more difficult. Whether that is because I have been doing it since the first year and the changes threw me because of what I was used to doing?
-
79. The complexity of E-rate 2 and the requirement to retain 10 years of data has increased the District's cost to pay for a consultant and to maintain the additional data. Can FCC help with these costs?
-
80. The complexity of the rules and forms needs to be greatly simplified
-
81. The demographic location for this field report stems from the [school], a highly litigious and unsettling high stakes agenda to promote "gambling"casinos . Scandals related to high stakes "gambling" casinos and interested parties feteed with lavish gifts and donations to establish gambling casinos as a life style in the [city] are the order of the day. In question are the lobbying groups and political action committees that promote the diversion of E rate funds for School Internet away from Elementary Schools like the [school] for Pork Barrel funds by nefarious groups and individuals.
-
82. The Form 471 and Item 21 data that had to be input this year was very difficult and time consuming. I would like to see if this could be simplified, but I also know that the information gathered will be helpful - just VERY time consuming and difficult.
-
83. The inability to consider cancellation fees during vendor selection makes it almost impossible to even apply for funding for contracted services and still prove that these fees were not part of the vendor selection process. If an applicant were to change providers every year, the perceived cost savings that they would achieve by changing providers would be offset or even more than offset by the fact that they have had to pay out that much and more towards cancellation fees. This makes it economically unsound to even apply for e-rate reimbursement considering these fees and the staff time and effort that it takes to understand the rules, complete the application process, and complete the PIA review process, let alone get through an audit. If the application process were eliminated entirely along with the eligibility for entities that operate at a level above having direct contact with the public, and an allocation of funds made to every library and school based on available funding and state-filed student and patron-served information, many more schools and libraries would be benefitting from the program. In the meantime, we believe that it would be prudent for the FCC to consider expanding the exemption criteria for filing the Form 470. There are several of our locations that have limited availability of providers for the services that we need, and we have found, in many cases, that we already have the best possible price from the only provider in that area. We are sure that we could not possibly be the only applicant that has encountered this situation and would greatly benefit from the relief that this would bring. Another application process improvement that would eliminate many errors, reduce the burden on applicants, and remedy many instances of program non-compliance would be to have an automated look-up tool to locate the appropriate choices of school districts based on the applicant's address. Also, it would be very beneficial if the USAC website could be comprehensively updated to reflect all of the current rules that have been passed by the FCC. Currently, an applicant has to sift through multiple areas to determine what is current and what isn't. In addition to the one topic listed in question 25, other areas that need further clarification by the administrators are the discount rate calculation process (specifically school district location), clarification of specific eligible and non-eligible services, the process for correction of application errors, and the audit process.
-
84. The last minute changes in this year's erate process was a hindrance to getting the applications filed in a timely manner. The constant changes made it hard to stay on top of the process and make sure you were doing everything correctly.
-
85. The modernization order was to "simplify" the application process, the discount calculation process, and the invoicing and disbursement process. After working with Erate for the past 18 years, I can honestly say that the FCC has failed miserably in this endeavor. So far the application and the calculation process has been a nightmare. With the hundreds of budgets in place for each district, I'm certain the invoicing and billing will be just as cumbersome as the application process. I hope the new President will quickly change the process.
-
86. The process is very complicated for librarians in small libraries. Simplify the process. We need the funding but the process is difficult, even traumatic.
-
87. The process should make it easier to stick with preferred (current) providers even without multi-year contracts.
-
88. The program is unnecessarily complicated. There is too much paperwork and too many requirements that are not needed to verify the entity is in compliance. We have to file a form. Then we get a form that says they got our form. Then we have to file a form that states we got the form that says they got our form.
-
89. The system is broken. We need to fund more.
-
90. The time needed to work on the Form 471, fill in the templates or create my own template, fill in the online form and review all data for accuracy is excessive and beyond the projected amount by USAC. The level of detail to provide data to USAC and have transparency increased the amount of time to complete the form by 10 fold from previous years. The form was not created to be the most user friendly and required duplicate work and time wasted. USAC should revise the Form 471 with input from the thousands of users in 2015.
-

91. The time to receive E-rate approval and dollars seems incredibly long.
92. The traditional voice services are much easier to predict and plan when trying to meet the program rules. The movement to covering the internal wiring projects is a move in the wrong direction. These projects may need funding, but the timing of the projects does not follow the e-rate planning window.
93. The website design and functionality for filing is extremely difficult and not user friendly.
94. The whole process is very difficult for me as I am a teacher as well. Small schools struggle to keep up and staff must multi task more than staff in larger schools. This adds stress to the process.
95. They are out of touch if they think they simplified the program. They don't live and work in school districts yet they feel qualified to make decisions for us. Very frustrating.
96. third party documentation for Priority two was a nightmare. Floor plans from libraries were too big to be sent in email. PIA reviewers requested them resized and sent again. When applying for a consortia this was very time consuming!
97. This is the first year we have participated in [consortium]. I have found the process more complex and very time consuming, fraught with delays that interfere with my other job duties.
98. This survey seems mainly related to schools. Libraries do not necessarily have the same problems that schools do. I answered a couple of the questions without really knowing if I was giving the appropriate answer. You need to talk to librarians about their needs, both large and small libraries. Even their needs vary. Really small libraries often have very limited budgets and need support for both voice and Internet access services!
99. This was a very difficult survey to complete. We use [consulting firm] & the staff there could have given a better responses.
100. Too much red tape that is very time consuming to meet every requirement. Most of the information they need to clarify items has already been submitted without re-asking the same information using different terminology.
101. Training sessions and rule changes should occur and be published before August. In order to comply with all local and E-Rate procurement requirements our school district starts the bid preparation process in September.
102. USAC did not know what to do to redo, refresh the 471 after a successful APPEAL with the FCC, and I'm not a lawyer. I had to call [USAC official] to get the ball rolling because your software, which includes notifications, doesn't know how to handle a successful appeal, or reversal of a USAC compliance DENIAL. I am rather sure we will have problems getting our 2015 refund for the (denied, but successfully FCC appealed) fiber optic line. Stay tuned. p.s. E-rate has been my LEAST FAVORITE TASK as a library director, hands down. I actually cried over this process (and denial). USAC and the federal government in nearly every endeavor - like the income tax code or now the ridiculously complicated ACA health care - makes processes so complicated that the people expected to complete these tasks don't enjoy life. It's getting that bad. Thanks for taking the time to read this. I know intentions are good, and I'm glad people have a decent job. Simplicity would be so appreciated. [Signature]
103. USAC should change their application processing to make it more easier and not time consuming. With the new system, plus the PIA, PQA and SRIR all together asking for review from April to present time, we did nothing but answer their review even in the process of learning the new 470/471 system. The reviewers should be considerate in giving us the time to understand the new system before bombarding us with SRIR issues.
104. Very disappointed on what is eligible this year. We had such a great program going and now we had to discontinue it.
105. Very hard to understand all the legal language. It needs to be simplified for those that are not technology whizzes.
106. We advocate: 1) keeping telephone services eligible for full funding (FCC is phasing out funding for these services; districts will see a 20% reduction in funding for these services starting 2015) 2) keeping cellular service - voice is being phased out, and mobile data is now only eligible in rare circumstances, like a book mobile 3) increase the funding for wireless equipment to more than \$150.00 per student Thank you.
107. We appreciate the efforts to make the program more effectively meet the needs of the schools and libraries.
108. We have one option for provider of landline telephone and Internet services. We don't need anyone to manage anything for us, we need funding for telephone, fax, Internet and c2 for connecting to fiber.
109. We rely on our consultant to know the rules and give us the information we need.
110. We would like to get approval of our applications by the third week of June so we can get our vendors started by July 1.
111. What good is wireless if we don't have the funding to give a device to the students? We need a program that gets a device to the students. We are a money hurting school district that need devices more than infrastructure.
112. When I called USAC help desk -I received 3 different answers for the same question! That is a concern- hopefully, the 3rd one -which I thought made the most sense was correct for my review.
113. Why are voice services and cell data no longer fully funded? FCC should do away with the cost allocation as it is very difficult and time consuming.
114. Why does it take so long to go through review? My 471 has been complete for 4 months. I will miss my summer window for equipment replacement - Again.
115. Would like to see better online tracking of status of my applications
116. You emphasized schools in your survey without including public libraries. Seems like your survey is indicative of the way e-rate is going anyway.

Impact of Voice Phase-out

Survey respondents were asked to briefly describe how the reduction in E-rate support for voice services has affected their organization:

- 86% described a negative impact to their school or library system.
- 13% were indifferent about the change.
- 1% were positive about the change

The individual comments are reproduced below. Only identifying information, such as a school name or email address, have been removed.

1. A lot because we are not going to be able to give cell phones to our technology department and our Maintenance department.	18. Because we roll the rebate funds back into students by using those funds for student laptops and iPads, we will have far less money to continue with this practice.
2. \$119000 impact. Significant to our budget.	19. Being a small school district, this will hit us harder than larger districts. We have fewer resources to shuffle to cover things
3. \$30,000 decrease in voice support this year; \$20,000 loss of support for cellular data	20. Biggest impact is cell phone costs - our contracts are \$250K yearly. This will be a hardship in the future.
4. a strain on our budget	21. Budgeting for Internet access has been reduced
5. Additional funding is required to cover necessary voice services at a time when additional funding is not readily available. With the phase out, the burden has been somewhat reduced but it is still difficult to find these additional funds because we can delete the voice services. Other services have had to be reduced	22. By the time that support for voice services is eliminated, our District will lose more than \$1million. These funds will need to be found somewhere in the operating budget, which is currently at a deficit.
6. Adversely affects allocation of our technology budget to cover costs that up til recently were covered by our E-Rate funding under Category 1 funding.	23. Cat 2 funds for 5-yr period are less than we use in a year, so reducing phone support just adds to the burden.
7. affected the way we budget,	24. Causing us to shift budgets to cover the difference and explore VOIP as a long term voice alternative.
8. affects general fund \$\$	25. Cellular data plan eligibility will affect my budget
9. Allowed us to allocate funds to other resources such as, books and videos.	26. Cellular devices will have to be cut. Data plans no longer available is an issue as well.
10. Almost half of our E-rate reimbursement funds were from voice services so the reduction affected us significantly.	27. Considering transition to VoIP services sooner than anticipated.
11. Any reduction hurts a small school	28. Consultant made is possible for us not to overlook anything in the process.
12. Any time you receive less services that impacts your funding. However, phone services are a necessity for our business.	29. Cost us about \$35,000
13. [State] has significantly cut not only capital budgets, but now M&O budgets this year. We depend upon the E-Rate program to offset the costs of utilities.	30. Cost us lots of money
14. As an ESA we do not qualify for Category 2, so the reduction in support for voice services is not being offset with funding for other categories, and is a net loss for us.	31. Cost us more.
15. As will all cuts in funding, the money has to come from somewhere so other areas of our programming was reduced to compensate for the loss of E-rate funding for voice services.	32. Cutbacks
16. Basic phone services are critical for k12 organizations. This will now be another expense the District must find ways to fund.	33. cutting other programs/expenses to compensate for the reduction of support
17. Because we provide services in unusual capacities (incarcerated youth, social and emotional, service to districts and itinerant service) we rely on voice services. This will hurt us as it is reduced.	34. Devastating We still need a phone for parents to call each school, with out redundancy in the internet connection, voip is questionably reliable. Parents are not forgiving-- they want the phone system to the school to work.
	35. Devastating.
	36. District funds available for computer hardware for students will be reduced. Less tech in the classroom.
	37. Does not affect.
	38. Don't have these funds to use for broadband. Added complexity and confusion to program. Limited communications in case of emergencies. Will no longer apply for e-rate.

39. Drastically. We implemented one-to-one cell phones for the Upper School students in 2014-2015. The forecasted budget presumed the same rate of reimbursement for the three years of the contract with the cell phone provider. Other expenses will have to be cut in order to meet the budget.
40. Drastically. We will be lucky to move forward with the enhancement of future services
41. Due to the money having to be spent out of operating, it has cost the district to not fund other items.
42. Educational programs will suffer because of having to fund voice services fully.
43. Employees will not get raises because the funds will be needed for telecom.
44. E-rate Funding was a critical part of this service.
45. E-rate support for voice was always allocated network infrastructure support.
46. Every cut we experience affects the community that we serve greatly.
47. Every division of our system uses communication equipment to support students. From academic supervisors, maintenance workers, technology technicians, we rely on voice to effectively do your job. We will have to make massive reductions in the number of devices because providers are not offering any discounts to help offset the reduction of E-rate funds.
48. Financially we have had to reduce services in other areas
49. From \$25K/annually out of pocket to \$250K/annually out of pocket.
50. Funds that were previously being used to purchase needed school equipment, supplies, etc. that directly impact student learning, are now having to be pulled from the schools to pay for voice services.
51. Getting E-rate for our telephone helped us significantly. Now we will have to add it into our budget for the year and that means less from another line item.
52. Greatly, we heavily depend on voice communications for our patrons. With our limited budget, with no foreseeable increases, monies will need to be pulled from other areas to meet these demands
53. Had to look at ways to make up the funding difference.
54. Had to shift funds back to voice services and install expensive new voice IP system.
55. Has an impact but will be somewhat offset by increased CAT 2 funding availability
56. Has cut what other technology items we can purchase.
57. Have to budget to cover the loss
58. Have to pay more for our phone service.
59. Honestly, we are new at this.
60. Huge impact on our technology budget. We do reimbursement and the money goes to technology. It will be impossible to get the district to give us the same level of funding as we are losing. We are a small rural area and do not have options to get more local funding.
61. Hugely!! We are a small school and after we are phased out, we may have to look into hosting our own voip server just because the expense is too much.
62. I am not sure but all I know is that when I got to a certain point to try and certify the form, it would kick me out.
63. I file for internet access for two consortia, and do not file for phone service
64. I lost my locally funded Instructional Technology Specialist due to the increased bills. This will have a huge impact on the use of technology by my teachers.
65. I must divert resources from purchasing library materials to cover the reduction.
66. If funding does not get down to 60% in Category 2 funding... we will essentially have no funding for communications...traditional phone service is still the most reliable service...it does not go down when the power does and since we cannot afford huge generators, it is the best option for us. The types of disasters that cause phone outages typically involve power outages...whole building generators are simply not affordable...
67. If this service is not returned we will probably lose our E911 service over the next two years.
68. In the end as a consultant that process E-Rate for school districts we will lose clients
69. In the past my private school was 90% funded because we serve families of whom 85% or more live below the poverty line. We are tuition based and our families can barely afford the low tuition we charge. E-Rate supported funding for voice and Internet services has allowed the school to provide educational technology access to our low income families. I fear that the phase out will be extremely detrimental to our families and educational program.
70. Increased cost will reduce other budget items
71. Increased drain on an already slim budget.
72. Increases the allocation of funds for voice service from the city and will be offset by reduction of allocations from other line items to compensate.
73. Internal communications has been very dependant on email and voice com's inside our buildings in addition to key staff while outside of the buildings
74. It adds quite a bit to our overhead costs. Each year will add an additional \$20,000 to the budget costs!
75. It affects our budget. We now need to shift funds from another budget line to pay for the telephone and fax services.
76. It certainly impacts our budget and our ability to have good communication from staff members who supervise students on and off site.
77. It didn't affect us because we use a consultant
78. It forced me to make a move to VOIP for pricing, even though I don't have the support people in place to support it
79. It has affected our organization by increasing the cost of doing business for mobile phone services.
80. It has affected us a whole lot. We only request voice services because our local tel-co, who is also our internet provider gives us our internet free of charge. The tel-co went to fiber last year and we now have upload/download speeds of 25/50. Very few cities in Iowa are where we are. Because many in our small community have gone to cell phones, we have to make long distance calls to them for reserves, overdues, etc. Our voice service has risen significantly. We already have wi-fi throughout our building.
81. It has been the only funding that we have been able to successfully get in the past.
82. It has caused an increase in the technology budget

- 83. It has caused organization to analyze waste and redundancy caused by "hidden" fees and lack of actual services paid for and provided. VOIP has proven to be more efficient and effective time and money wise.
- 84. It has caused us to have a shortfall because we depended on that funding and now we have to budget for the extra to pay difference which shortens what we can spend buying other needed technologies.
- 85. it has cost us almost \$100,00 per year
- 86. It has effected us considerably. Voice will never go away completely and is a huge part of everyday communication.
- 87. It has had a huge impact on budgeting and will result in less classroom materials for the students and a personnel cut.
- 88. it has increased our expenses, which required us to change our plans
- 89. It has naturally increased our costs for these services as they are a part of our doing business.
- 90. It has negatively affected our network, infrastructure and security
- 91. It has placed an increased financial burden on several of our departments. As the discount goes down over the next 5 years, that burden will increase.
- 92. It has put us in a terrible position... we just switched over to VoiP system when the rug was pulled out from under us.
- 93. It hasn't been discussed yet but it will eventually be a topic that will need to be switched to something cheaper.
- 94. IT HURTS - Our Rural Impoverished district is very dependent on USAC funds for voice services. Not sure how we are going to cope with the eventual phase out.
- 95. It hurts a great deal to not receive as much funding this year and no funding in the future.
- 96. It is another \$15,000+ we have to figure out how we will fit into the budget since we cannot afford VOIP.
- 97. It is both a financial burden and it is very time consuming to remove the charges that are no longer eligible from an invoice
- 98. It is causing us to use local funding for this and taking away fro teacher salaries

- 99. It is forcing us to make cutbacks in voice services and eliminate as many lines as possible
- 100. It is going to be a significant drop in the amount of money we will receive from e-Rate
- 101. It is horrible that FCC is cutting funding. We moved to a hosted VoIP solution because of E-rate funding and now FCC has changed it. We are looking at approximately \$260,000 annual increase in our phone service bills.
- 102. It may result in the reduction of cell phone's for District emergency response teams and administration. It has impacted our budgets with the installation of a new phone system next year
- 103. It means that something else in our budget has to be cut in order for voice services to be fully paid.
- 104. It pushed us into voip at a lower cost.
- 105. It was the only money we had received in the past
- 106. It will affect our budget negatively and could reduce a position or two to continue funding voice.
- 107. it will affect our budgets in the future as erate begins to reduce reimbursement for some services
- 108. It will affect our organization tremendously in the worse way.
- 109. It will affect the Money we have for technology in the district
- 110. It will be a significant hit to our district's budget.
- 111. It will be an increasing burden on the budget that may result in cutting local funding available for classroom technology.
- 112. It will be harder to provide administrative support, due to having to shift funding to cover the reduction in funding for voice services
- 113. It will cause use to use more of our operating budget to pay for those costs
- 114. It will cost the district funds that it could have used in the classroom.
- 115. it will cost us some \$
- 116. It will cost us thousands of dollars. Other options are now beginning to open up so the impact may be lessened in the future.

One Area Needing Clarification

Respondents were asked to share their number one area needing clarification:

- 32% the 470/471 application process
- 30% eligibility rules
- 13% bidding requirements
- 12% Category 2 rules
- 12% other rules, such as gifts or Lowest Corresponding Price

The individual comments are reproduced below. Only identifying information, such as a school name or email address, have been removed.

1. "managed broadband services" needs much more details published.	23. Bidding should be driven by cost. Like no bids unless cost greater than \$10,000.	51. CIPA
2. 150/student budget	24. Budget allocation overages when the district intends to cover the overage.	52. clearing form 471 and budget reporting and reconciliation
3. A real reference for the percentage of eligibility of an item	25. budgets	53. combine the 470 and 471 processes
4. all	26. Budgets and Invoicing for each school	54. Competitive Bidding
5. ALL	27. bundled services	55. Competitive bidding
6. All the different types of eligible broadband.	28. C1 and C2 eligibility	56. competitive bidding - allowing to specify manufacturers
7. Allow people to upload quote or monthly bills to prevent a PIA requesting that information.	29. C2	57. Competitive Bidding and Shared State Contracts
8. approvals for products and services bought after a waiting period that might fall outside of window.	30. Calculations or measurements for use .	58. Competitive bidding process-most districts I have dealt with are definitely not very knowledgeable about this process and what rules they need to be following
9. approved services	31. can't ever get their enrollment data to match ours	59. Competitive bidding--Since we are being looked at for not picking the lowest bidder even though they did not have the best proposal.
10. audit process	32. Can't think of any right now	60. compliance agents that understand technology rather than deny because of lack of understanding
11. audit requirements	33. cat 2 471 application guidelines	61. Consistency in PIA
12. Basic Maintenance of Internal Connections: as it stands now, while maintenance is necessary, program support for it is too complicated	34. Cat. 2 application and eligibility	62. consortia
13. Better instructions and maintenance of online applications	35. Category 2	63. Continued training in all the changes.
14. bid assessment on cell phones	36. Category 2	64. contract negotiation
15. bid awards	37. Category 2	65. Contracted vs. non-contracted services
16. bid evaluation	38. Category 2	66. Contracting materials - what constitutes a contract for E-Rate
17. bidding	39. Category 2	67. Contracts
18. Bidding Compliance	40. Category 2	68. Contracts
19. Bidding Requirements	41. Category 2 budgets	69. Cost allocation
20. bidding requirements for specific type of equipment	42. Category 2 funding procedures. When and how much?	70. cost allocation between school within the district
21. bidding rules	43. Category 2 requirements	71. cost allocations
22. Bidding rules and Best way to enter entities on new 471	44. category 2 school and student allocation calculation	
	45. Category Two Eligible Services	
	46. Cell phone device cost allocation	
	47. cellular eligibility items billable	
	48. cellular services eligibility	
	49. Cganges in the program rules	
	50. Changing items after approval, aka model #'s	

72. Cost allocations for services such as cellular/data plans on smart phones. This was the biggest headache and most time consuming part of our FY2015 application and vendors like Verizon seemed clueless as to what to do about it.	103. eligible number of connections	138. How purchases are to be made once funding is received.
73. cost effectiveness	104. Eligible Products	139. How purchases are to be made once funding is received.
74. dates for contracts	105. eligible products	140. How they came up with the \$150.00 cap?
75. Dates on 486 for early C2 projects (April prior to funding year)	106. Eligible products and services better/clearer defined for non tech people.	141. How to count students at a Vocational School that isn't their home school
76. Deadline for filing invoices for FY 2012 services funded in 2015	107. Eligible service list - organize it and make it a list so you don't always have to read through the order to find what you are looking for.	142. How to determine funding levels, and allocating resources to shared recourses.
77. Defining how they can say yes and then holding payment for a year while they review.	108. eligible services	143. How to do a bid matrix
78. Definition of terms and their application	109. eligible services	144. how to do the forms easier
79. detail required for submission of forms spelled out step by step	110. Eligible services	145. how to make changes once something has changed
80. Differentiate allowances between schools and public libraries. They have different needs.	111. Eligible Services	146. I am okay with the program rules and compliance.
81. Directions need to be clearer for those of us that are in smaller libraries. Don't assume we know what the acronyms mean.	112. eligible services	147. I had trouble filling out the new 471 and I have been doing Erate since the first year, but otherwise having a synopsis of changes in the rules from year to year would help.
82. Discount calculation, previous years some schools have 83%, 85%, 95% discount rates, while the matrix states 70%, 80%, 90%	113. Eligible services list	148. I had trouble when trying to file a Form 486 for a delayed FRN from a previous funding year. The online form should allow you to enter the new dates without having to file Form 500 for change to service contract expiration and waiting weeks for it to take effect. This caused me to miss a crucial step and I was denied funding because of a late 486.
83. Discount rates	114. Eligible Services List and pricing of lit and dark fiber	149. I used a 3rd party for my E-Rate processes, so I do not have an answer for this.
84. discounts	115. eligible services. They keep changes the products and their descriptions are next to useless. They, apparently, use some tech jargon known only to industry insiders and they can't define it without using equally obscure jargon.	150. ineligible items / Urban-Rural
85. Discrepancy between PIA review questions and Form 471 questions	116. Eligible services/products	151. instructions are there; the entire process is just too complicated
86. Document retention	117. Eliminate voice phase down.	152. Internet safety curriculum
87. Don't know	118. erate timeline for 470 471 and funding	153. Invoicing
88. Don't know	119. ESL	154. invoicing, BEAR
89. Don't know	120. Every thing under Category 2	155. Is VoIP eligible or not?
90. early start for C2 projects	121. everything	156. Item 21
91. Ease of operation, procedural guidance on bidding, and computer use for the 470/471s	122. Filing for reimbursements	157. Item 21 questions.
92. eligible services	123. Filing of form 500 - why and when	158. Item 21 requirement
93. Eligible services	124. Form 471	159. Item 21 requirements
94. Eligibility	125. Form 471 attachment list procedure	160. lan being up when wan is down
95. Eligibility	126. form deadlines	161. list of eligible items
96. eligibility	127. Forms	162. Lit fiber, dark fiber
97. eligibility	128. Funding	163. long-term eligibility--set up a 5 year rotating eligibility schedule during which only BEARS are required
98. Eligibility list	129. FUNDING AT THE DISTRICT LEVEL ONLY	164. Lowest Corresponding Price
99. Eligibility of fiber special construction beyond last mile	130. funding breakdown	165. make invoices easier to figure out!
100. eligibility of services in language I can understand	131. Gift Rule	
101. eligible items	132. gifts	
102. eligible and non-eligible products and services	133. Handling of Charter Management Organizations	
	134. hardware eligibility	
	135. Hosted services	
	136. How C2 is reviewed and what happens if there are items denied but there are more items on our bid list - we had just reached our budget cap.	
	137. How do we handle changes by contractors after 471 is filed?	

166. Managed Services and Software Maintenance

167. Model RFP

168. More clarification on filling out forms with multiple entities. For instance, a regional library that has county libraries, not branches.

169. More information overall

170. Multi-Homing networks

171. Multiple internet connections

172. Multiple-year contracts under one Form 470

173. new rules-regulations pertaining to Coops

174. none

175. none

176. None any more than others

177. none.

178. Not sure

179. not sure

180. not sure

181. not sure

182. Not sure

183. Not sure.

184. NSLP

185. one and five rule

186. Over all understanding

187. Payments

188. per school allocation

189. Phase outs, what's now covered.

190. PIA

191. PIA (though haven't had it yet this year it has been concern in past for us)

192. PIA Review

193. PIA Review and selective review standards.

194. PIA Review: items approved one year are questioned the next

195. PIA Reviews

196. PIA reviews are an overburden to applicants, and nothing for providers, way out of balance

197. Product and services eligibility

198. product eligibility

199. product eligibility

200. PRODUCT ELIGIBILITY

201. Program Review

202. Program rules/compliance as it relates to Charter Schools/Charter School Districts...

203. Qualifying services

204. Rebates on Services

205. receiving varied responses when calling USAC for technical assistance - who should we believe?

206. record keeping

207. RED TAPE

208. Reduce complexity if only applying for voice telephone service.

209. Reform

210. Requirements for 470/471 submission.

211. Reviewers should have access to previous funding years PIA questions and responses, so the same questions aren't asked year after year.

212. RFP

213. rules

214. Rules seem clear

215. School needs are completely different than library needs.

216. service/hardware eligibility

217. services that are eligible

218. simplify reviews

219. SLD application review

220. Some of the items on the ESL need clarification or at least, better explanation. They are vague and not easy to interpret

221. Special Reviews

222. Start service date for internal connections-Ship Date, delivered date, or install date -- had a review question on payment that stated that I should have started the an C2 service before I received the materials

223. The attachment to Form 471 took two of us a number of tries to upload

224. The entire program is too confusing and paperwork intensive.

225. the five year rule

226. The formulas used to calculate the funding

227. The new form 471

228. the new spreadsheets are not intuitive

229. The school site has a low capacity router that diminishes the connection to Internet Broad Band connection ,plus there is a strong in crowd with lobbying interests that are deeply politically motivated.

230. They are very clear already

231. Too many forms each year!

232. Training from 3rd Party Vendors.

233. unknown

234. unsure

235. Urban or Rural definitions

236. various audit requirements

237. vendor selection

238. Vendor Selection

239. Verbiage on the forms to allow for flexibility

240. Vocational students eligibility

241. voice over ip

242. Voice Over SIP

243. What cloud services are truly eligible

244. What do they mean by "RFP"?

245. What items are eligible for Prior. 1 and 2

246. Who qualifies for priority 2.

247. Why E911 services are not eligible

248. Why the change to a very narrow focus when we have already funded wireless with local money

249. Why they choose to do the opposite of the order POTUS when ordered to increase access to the internet for all children in the US

250. wifi

251. wifi / internet access

252. wireless management specifically [manufacturer]

Gauging Support for a Single Budget System

Respondents were asked to share why they would support a single budget cap, combining Category 1 and Category 2 services. The individual comments are reproduced below. Only identifying information, such as a school name or email address, have been removed.

- | | | |
|--|---|---|
| 1. \$150.00 per student is going to cripple this district. | 12. Because of the flexibility of choosing C1 or C2 or a combination of the two. | 25. C1 funding is critical for our program operations. I would favor an increase in the funding level of Category 2. |
| 2. A funding cap on C1 would diminish the equity that this program is supposed to protect in access of Internet and telecommunications services. Schools in rural areas will have a much higher cost per student for these services. The C2 cap is acceptable as nearly all of the goods and services covered under C2 already have cost equity between rural and urban areas. | 13. Because sometimes I could use more for C1 instead of C2. | 26. C1 funding is important and we don't want to put that at risk while seeking more C2 funding. |
| 3. Again, not having as many students as a district but with the same technology needs, we are short changed by the per student funding. | 14. Being a remote school my internet connectivity cost is VERY VERY high and I would have no money for anything else. | 27. C1 is (or should be) the most important category and should ALWAYS be fully funded before funding C2 requests. |
| 4. Allows more flexibility in how funds are spent. Per year caps means no worry about exhausting limited funds over a five year period. | 15. Being able to allocate money where needed the most is better for my library because it allows for adjustments in services as needed for the patrons. Being locked in to a budget cap can cripple our purchasing needs. | 28. C1 is also our priority and would greatly impact our budget if this category were also capped. |
| 5. As a library this form of funding cap would be difficult to calculate. | 16. Better than the current system; whereby the FCC is dictating educational planning to our school. How do they know which school needs the funds better than our district? | 29. C1 is very critical as well and if C2 is going to affect it it's not going to be beneficial for the district. |
| 6. As long as FCC doesn't cut more service fees and restores phone service coverage. | 17. Both C1 and C2 are needed | 30. C1 MUST have a clear priority over C2 and higher C1 discounts are badly needed in a high-poverty rural area like ours. Our greatest need is for much more bandwidth, but we are stretched to our limit paying for what we now have. |
| 7. Assuming the cap amount is sufficient, I believe budget decisions are best made at the local level and would be allocated to the most pressing needs. | 18. Both Categories are extremely important. | 31. C1 needs to have no caps to cover expensive internet access for those of us schools outside the cities with only one choice in town to get internet access. |
| 8. Because costs change from year to year. | 19. Budget would be controlled | 32. C1 services are "necessary" for technology availability in our schools. C2 services should be a minimum of \$300 per student in addition to the C1 services to provide the infrastructure necessary to provide the services from C1 to the classroom. |
| 9. Because funding needs change from year to year. | 20. C1 & C2 are both essential elements. We must have C1 every year to maintain Internet services at a level that all students can have access to a digital environment. We must have C2 every year to continue upgrading schools to an acceptable level and to maintain adequate network in the schools. | 33. C1 will eventually need to go to 10GB, the 20% per year network upgrade process will need to continue consistent with our technology plan which is a living document, despite FCC/USAC/SLD machinations. |
| 10. because it would take funding from c1 to fund c2 you would have to choose and would not be able to afford as a small district | 21. C1 and C2 should not be combined. | 34. C1 would also end up under funded. |
| 11. Because it's still a matter of robbing Peter to pay Paul - we cannot afford to allow the program to allow a technology director to have to make decisions regarding how best to spend their money - they are already having to stretch their budgets further and further and do more with less...don't make them have to choose. | 22. C1 applications should always be funded first and in a higher priority. | 35. Can not project future needs with the fast pace of changing technology. |
| | 23. C1 cannot be easily broken down by individual use. | 36. caps only tend to limit needed funds for technology |
| | 24. C1 costs are standard and reoccurring. C2 cost vary from year to year based on infrastructure age and obsolescence. In addition, a core site upgrade very negatively impacts funding for infrastructure at all other schools served. | |

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|--|---|--|
| 37. Cat 1 funding should be funded regardless. The services are never going to cost less. They are static costs. | 58. Having a per student cap cripples our small schools and districts. By small I mean districts with few students. Geographically, my district is huge but we haven't got very many students at each school. | 69. I don't need to purchase C2 every year or for our newest building but C1 is all the time. Being able to shift around would allow me to keep a steady upgrade/rotation without taking such large hits all at once. For example I have one building that is brand new and will not need equipment for at least 5 years but I can't spend any of the money allocated to that school for anything else in a building that has needs. |
| 38. Category 1 purchases are significantly higher than Category 2 purchases. I would not want our library be forced to sacrifice funding for Category 2 purchases or be limited by any means. | 59. Helps the smaller schools | 70. I think C1 should be funded year after year and that C2 should be funded at \$150 every few years or \$350-500 per student every 5 years. I don't think the funds for both categories should be merged. |
| 39. Choose where the funding goes. | 60. Hopefully this would make funds available to those of us who do not usually qualify for category two funding because our free and reduced numbers are too low | 71. I think it would be seriously underfunded and then I wouldn't be able to upgrade my network or provide services that are needed. |
| 40. Depending on services, C1 costs could eat up into the cap in a significant way, thus leaving less for infrastructure (C2) projects. | 61. I am not in favor of any funding cap... however, I understand the need for one to keep spending under control. | 72. I think it would give us more control over erate money |
| 41. depends on the per student cap | 62. I am not in favor of automatic funding caps as a general rule. | 73. I understand the funding cap, but if any major renovations, no where near the funding needed to complete say wiring infrastructure, barely covered our wireless project this year |
| 42. Does not seem to benefit schools with lower ADA | 63. I believe that as a school district budgets shrinking or declining at a rapid rate that I as the Technology Director should have the right to allocate how much funds I want to go where based on need in the district and for the students. | 74. I understand the need for a funding cap. Right now 150 per student simply isn't enough. Some schools rewiring and new network gear and new wireless. |
| 43. Doesn't make sense to increase the left hand and then have to reduce the right hand because of a cap. | 64. I believe that category 1 funding should remain the priority. | 75. I would be concerned about the limits on funding the two categories. Without the funding, I am limited to what I can do to provide for the students. |
| 44. Doesn't work for public libraries who serve more than students. | 65. I believe that it would end up being much more complicated and would require at least \$300 per student to cover C1 and C2. Limits should be based on total district population not school by school. | 76. I would certainly have to look at the numbers. I was approved for a cat 1 service last year and it is now back in review without one penny being paid as promised. If USAC had said no in the beginning I would not have had the service. |
| 45. Doing this would not really help the problem. When you increase the amount per student but lump both C1 and C2, now you have created another variable with another set of problems. Increasing the C2 cap is simple, fair, and reasonable. | 66. I could allocate funds to what really needs funding | 77. I would favor the freedom to allocate funds where needed. However, \$150 is not enough for C2 let alone C1 and C2. IF the amount were at least \$500/student, then YES to a set amount with more flexibility. |
| 46. Don't apply for C2 purchases. | 67. I don't get enough C2 to meet my needs, so I'd at least like to get my C1 needs met. | 78. I would favor the two categories remain separate due to their significant roles. The important, indivilized role of the two categories might be misguided if combined... |
| 47. fair | 68. I don't know the best way to answer that question. The new erate rules were put in place namely to push wireless into the classroom, which significantly increases bandwidth needs that grow exponentially over time. Being in a rural community, we have limited options and bandwidth is very expensive relative to our overall IT budget. So, we are getting help putting in wi-fi but increasing costs in other places. | 79. I would have more flexibility to fulfill our needs |
| 48. Flexibility | | |
| 49. Flexibility | | |
| 50. Flexibility is a good thing | | |
| 51. For 20, it depends on if this is an annual amount of over 5 years. If this is an annual funding amount I could get buy with \$150-250 per students. | | |
| 52. Funding caps are often insufficient to meet needs across time, especially in a rapidly changing area like technology! | | |
| 53. Funding caps do not meet the needs of all schools | | |
| 54. FUNDS SHOULD BE MADE AVAILABLE TO THE DISTRICTS TO DETERMINE WHERE THEY BEST SERVE THE NEEDS OF THE DISTRICT OVERALL | | |
| 55. Gives more flexibility for local decisions to meet the district's current technology needs. | | |
| 56. Gives the District some flexibility | | |
| 57. greater flexibility in a fast changing setting | | |

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|---|--|---|
| <p>80. I would like to apply it where we see fit</p> | <p>Districts must match in funding the % needed to bring the funding up to Dollars/per student level.
Example 90% district must match 10%, If the 90% district receives 100,000/year they must budget from the local unrestricted 10,000 (minimum) 60% district must match 40% of the funds allocated. If the 60% district receives, 100,000/year they must match 40,000 a year in unrestricted funds (minimum)</p> | <p>96. It is hard to allocate based on student population because you still need to provide basically the same services to all buildings regardless of how many students are in attendance. Square footage might be a better tool for determining allocations with network needs.</p> |
| <p>81. I would need to be on board with how an overall annual funding cap was structured, how it would effect Consortiums, and whether it would increase or decrease current level of funding before making any determination.</p> | <p>83. If a funding cap of more than \$150 is allowed for C1 and C2 combined then there would not be a need to differentiate between C1 and C2. We believe that bandwidth is a PRIORITY and should remain uncapped.</p> | <p>97. It is hard to estimate the costs needed for internet although the costs are reducing and speed options are increasing.</p> |
| <p>82. I would prefer if the district was given funds for technology/broadband/infrastructure to deliver the broadband, funded on a per year basis at a specific level. This consistent approach would streamline e-rate. As an IT director I could plan on X number of dollars each year to pay for NEEDED items. No longer would a 90% district be able to spend 300,000 in C1 funds and have their C2 funds available as well. An example funding formula per student X K-12 enrolled students X Discount level= yearly funding. Allow the district to spend the funds however it is needed to support broad band delivery to the students. Examples of usage Buying networking equipment/switches Paying for Broadband connection(s) Paying for MAN/WAN connections Wireless Access Points Support Contracts Installation Fees Battery Backups This would give a SET budget each year that the school could depend on. Currently E-rate is a gamble on IF we get this or not, most districts ask for the moon because we have not had C2 funding in YEARS, our local budgets/other means can not cover it and we desperately need the requests. Right now I do not trust the e-rate program to provide anything for a rural 90% discount school, other than paying for the broadband connection. I can foresee abuses under both systems. One say guard could still be an application with Tech plan/justification/replacement cycle/ROI/end result/narrative on how it will support broadband/students growth. Some districts may need to spend the money to buy devices because right now they can afford gigs upon gigs of bandwidth, but are stuck with devices that are 10+years old. This money should be given directly to the e-rate coordinator at a district and restricted to IT services/hardware/support ONLY.</p> | <p>84. If it allowed funding for internal structure.</p> <p>85. If it covered all C1 C2 costs and voice</p> <p>86. If our district felt the need for safety as # 1 or the need for internet was # 1 - we would have the right to decide.</p> <p>87. If the funds are \$500 per students.</p> <p>88. i'm not sure. My first thought is that I would not want C1 services tied to student/FTE.</p> <p>89. Internet and telecom costs are operating expenses.</p> <p>90. Internet is a service and C2 is the equipment infrastructure - two different things.</p> <p>91. Is gonna help us to add more C2 to helps upgrade our network.</p> <p>92. It allows for flexibility in allocating funds where it is most needed.</p> <p>93. It could very possibly make budgeting for projects more straight-forward down the road.</p> <p>94. It is assumed that this would be every year and in that case I would support as it would allow us to allocate to C1 when we were not doing C2 upgrades and that would ease funding for POTS and Internet connection. On the years where C2 was highly needed we could adjust and allocate all to C2.</p> <p>95. It is better to allow the individual school to determine priorities so that the school is able to meet the educational needs of its students</p> | <p>98. It is too complicated to figure all of that out. It is easier to just be given an amount.</p> <p>99. It limits you if you have a big project that needs to be done. Just because we have less students doesn't mean that its less expensive to update infrastructure.</p> <p>100. It offers the ability to customize the effort on a campus by campus basis affording the ability to add bandwidth at high density locations, for instance.</p> <p>101. It will meet our needs</p> <p>102. It would allow for a more precise 470 bid.</p> <p>103. It would allow us to plan purchases that would take advantage of up-to-date technologies.</p> <p>104. It would allow us to prioritize our needs.</p> <p>105. It would depend on the amount allocated per student</p> <p>106. It would give districts more flexibility in determining how/where they were going to spend the funding.</p> <p>107. It would give you more flexibility from year to year as needs change.</p> <p>108. It would greatly benefit our school district to be able to have more funding available. Being a small school district, the ability to provide a 1 to 1 ratio is almost impossible.</p> <p>109. It would make it more flexible to meet the needs of the school.</p> <p>110. It would need to be significantly higher if it was to include a cap for C1. These caps are a significant barrier for accepting adequate services and properly delivering them throughout the school.</p> <p>111. It would provide some flexibility in how we use the allocations.</p> <p>112. It would simplify our decisions.</p> |

113. It's my belief that the program was fine the way it was. Some things just needed to stop being eligible. Hosted VoIP, and other expensive services ate up all of the available funds.
114. Less complicated and monies can be utilized more efficiently where needed.
115. Less complicated. Money can be used where needed.
116. Libraries know what their community needs, if we had more options we could provide those items.
117. Local Control
118. Lumping C1 and C2 would put overall C1 funding in jeopardy.
119. More bang for the CAT 1 buck.
120. more flexibility to allocate funds as priorities and resources shift
121. More flexibility with use of the grant
122. more money, more flexibility to our yearly needs
123. Much of C1 is out of our control; we have more control of C2 and it help delineate the issue and improves services to classroom.
124. Need all the funding we can get.
125. Need the internet funding to be solid not held back because we need other equipment also. We can get by easier with less equipment than we can with less internet.
126. No, because wear and tear, as well as hardware becoming obsolete is a yearly issue; and not one that conveniently happens every five years. Schools have multiple expenses yearly, and it was great when we were allowed category 1 and 2 reimbursements based on need.
127. Not across C1 & C2. All C2 funding would be absorbed.
128. Not all schools have the same needs for infrastructure. Many of the neediest schools have not qualified for funding support for many years, so the possibility is high that the costs would be greater due to old equipment.
129. Not sure at this time. I work in a public library.
130. Once my CAT 2 network is in place, yearly maintenance costs can be budgeted, with the remaining funds used to cover other CAT 1 services that the district requires, including voice and web hosting.
131. Once the infrastructure is in place, we won't need new equipment for 5 years. We need voice services EVREY year.
132. One issue is that the C2 budget is determined more by building design/layout then the number of students in the building...I have some schools that over E-Rate budget thus more funds from local funds and other schools with remaining E-Rate budget...if we base the funding on district shared discount then I would suggest that there not be a school allocation but district allocation for c2 services.
133. Only if the cap were \$350+/student. That is what is needed to maintain, & grow a viable network infrastructure and provide necessary services to students and staff.
134. Our district only qualifies for 60% of communications, broadband internet access as it is, if you put a cap on that, it will be non-existent. \$500 per student would have given us enough \$ to fully fund the existing broadband project and would also have covered a portion of the internal wiring of new facilities that will come online summer 2016. As it is... If we get funded, it will amount to about \$32,000 of a \$128,000 wireless project and there will be no \$\$ for next year. I think ...the government is working hard to write more districts out of the ERATE funding in the guise of helping
135. Our district really needs to continue w/using voice services
136. Phone services would be left out of the budgets.
137. Prefer no cap on Category 1
138. provides more flexibility to meet district needs
139. Putting any cap on C1 funding could result in reducing the number of options for broadband which contradicts the objective of ensuring that students have high speed broadband access.
140. rising costs of utilities
141. School districts would like more flexibility to spend since we know our needs better than government.
142. Schools with oldest infrastructure equipment may be eligible funding, but the amount may be inadequate for complete upgrades.
143. Schools with small enrollments (for example 100 students) do not get enough to cover all of their needs. Larger schools (for example 1200 students) get more than is needed to cover their needs. Our school district has both with various sized schools in between these two examples.
144. Services in C1 fluctuate and need to be separate for accounting purposes.
145. Some districts risk not getting any funding at all.
146. Some of our projects would exceed a one year per student cap.
147. Some schools will seek advanced equipment upgrades while others will be trying reach a basic service level.
148. Sometimes there are very high one-time startup costs; combining C1 and C2 would either limit C2 or prevent switching to services that would ultimately save money. (But, I'd love to see an aggregate of all sites instead of just per student per site.)
149. support is sufficient to support our needs.
150. Systems could then make the choice for what is important. To me, this is the way to add voice back into the funding. Give us a yearly allocation per student and we can fund our network and excess funds can shift to fund some voice services.
151. Technology decisions should be made at the local level -- not by an agency that is unfamiliar with the technology requirements of students/schools. Limited funding limits options and pressures applicants to make decisions on solutions (products/services) that are eligible but not necessarily suitable. There is not a "one size fits all" solution.
152. That complicates the process. Plus [consortium] is taking over our C1 so that may have a effect on this idea.
153. That way we could allocate the funds to all voice services.

154. The \$150 cap would continue to hurt small schools (160 students) while it would continue to support larger schools. Larger schools have always benefited the most from the E-rate program and continue to do so.
155. The ability to apply the funds at the point of need is important. I may need more funding focused on my high school campus than my elementary campus because my network core is housed there. There may be a larger demand for wireless on one campus than another, but I am limited in the expenditure of C2 funding based on student enrollment on the campus rather than the point of need. Districts know their situations better than USAC can discern through the application process.
156. The accounting would be awful! Easier to tie the amounts to specific needs.
157. The cap just complicates the process.
158. The combination of covering a percentage of actual costs and creating a technical budget allows for coverage as prices rise. Our concern would be if the funding levels were not set high enough and costs rose significantly, it could seriously impact the ability to effectively budget.
159. The cost of Internet service would take to high of a percentage of the overall funding available.
160. The costs per student dramatically increase for smaller populations but still need service such as 1GB internet
161. The District knows how it needs to spend any additional funding approved for.
162. The FCC is completely out of touch with how much any of this costs in rural areas. Their caps are based on averages in big cities, and they short-change rural areas where costs are high and populations are low.
163. The funding would probably end up being less than what we get now.
164. The money needs to be handled differently, to ensure bandwidth meets the need of the school, money would be greatly wasted - by purchasing more bandwidth then needed at the current time.
165. The priority should be C1 and then maybe set a cap for C2 purchases but everyone should have a chance to be funded. In the old system, only a few were funded.
166. The process is too confusing.
167. The same districts that have been receiving the money will still receive it, taking away from those that never qualified.
168. The school would be able to fund access, maintain E-rate eligible equipment, and periodically upgrade that equipment. It would keep costs affordable (as the built-in obsolescence makes technology over priced and costly to maintain).
169. The schools will have the flexibility to spend the funding for what is needed the most.
170. The technology facilitator will know what is needed to be purchased. It should be left up to that person on how to spend the c1 or c2 funds.
171. Then it could be up to the districts to prioritize, and budget for, the greatest needs
172. Then maybe there would be funds available for our school that would help bring equity to the program.
173. Then we would know each year how much we would have to spend over all through the funding, and not have to worry that something was not getting funding.
174. There is really not much left in Category 1.
175. There would have to be a significant increase per student that most likely would not happen. The other issue is that learning does not stop once a child leaves the building. They still need access to resources before and after school hours.
176. These questions are written for schools, not libraries so it's difficult to comment. For us, the new Cat. 2 funding per square foot of library space meets our needs.
177. This is a difficult question without hard numbers.
178. This will allow for students in rural/poor districts to have access to the same services as other districts.
179. This would affect different districts in different ways, based on the current needs of the local district
180. This would allow for more flexible spending.
181. This would allow us additional flexibility to locally decide where to apply our services and equipment.
182. This would allow us greater flexibility as emerging educational technologies become available.
183. This would be a little more fair for us to keep up with needs.
184. This would give the districts the ability to decide how they need to use the funding.
185. This would give us flexibility in how we focus our deployments and allow us to address all needs.
186. This would help to determine the route we would take for C1 and C2 services.
187. This would provide increased flexibility as our needs change.
188. This would provide more flexibility. Our district needs a lot of work on its infrastructure and the budgets for some of our smaller schools are too limiting.
189. Too early in the process to consider more far reaching changes. Let's see how this set of changes affects the process over the next 1-3 years.
190. Trying to level the playing ground against all the needed resources from a rural standpoint that would allow the students to compete against the \$\$ spent in the city environment that have a rich environment and resources at their disposal
191. Until the infrastructure is "in place" \$150 would not be enough to cover both C1 and C2 needs.
192. Voice services are equally important.
193. We are a poor school district. I would rather see the funding based upon true free and reduced numbers. Instead of giving points for rural, take away points for urban areas that can receive these services at a lower cost, and that have a significant tax base already.
194. We are a rural school and getting Internet Access is expensive. Current costs for Internet and Internet Service Provider is around \$33,000 with contract renewals coming up in 2017 with expected increases in cost.

-
195. We are a small school system and by not capping we may not have the funds available to us as well as a larger system
-
196. We are getting funding for C1. It is C2 funding that I need. The current budget is only half of what I need to complete the infrastructure purchasing my district needs.
-
197. We are unable to get C1 funding except for one of our many ISP carriers due to erate rule. Since they disallow multiple ISP carriers, we could apply the funds in C2.
-
198. We could allocate funding to where it is needed the most.
-
199. We could allocate the resources to the individual classroom needs.
-
200. we have needs that must be met and this forces us to take actions that may not be optimal at this time.
-

-
201. We know what is needed for our community.
-
202. WE NEED ALL THE FUNDING WE CAN GET
-
203. we need the flexibility
-
204. We would be able to have ability to fund more if there was that flexibility.
-
205. We would be in favor of an overall annual funding cap that applied to C1 and C2 because we have never been able to receive P2 funding in the past. If the cap would allow for our district to file for additional C2 funding and be approved as our district grows, that would help our annual operating budget.
-
206. We would never get it.
-
207. Why would you not? Monies avail but not use it?
-
208. Would be able to use where needed at the time
-

-
209. Would make the process easier
-
210. would need more information on the amount of the cap.
-
211. Yes, because I wouldn't need to get new C2 every year. I would then be able to plan to add additional C1 services during the years I don't need C2.
-
212. Yes, because it will allow flexibility to acquire the services/equipment needed.
-
213. Yes, it depends on what we need to upgrade in that year- core switches, bandwidth, security network, since it is reimbursed, we have to long range plan with our budget and in NY we have a 2% tax cap on school budgets.
-

Survey Form

2015 Survey of E-rate Applicants

Introduction

PURPOSE OF THE SURVEY
The purpose of this survey is to gather feedback regarding the E-rate program from school and library officials with working knowledge of the program. Summary statistics from the survey responses will be shared with the FCC and USAC. The survey is open until June 24, 2015.

ALL RESPONSES ARE CONFIDENTIAL
Only aggregate data will be used for analysis and no individual responses will be made available. This information will not be provided to a third party.

USING THE SURVEY
Use the navigation buttons at the bottom of each page. Do not use your browser navigation buttons to move through the survey.

QUESTIONS
If you have questions about the survey, please e-mail info@fundsforlearning.com or call 405-341-4140.

Ask your colleagues at other entities to complete this survey! Your opinion and other E-rate stakeholders matters! Thank you for taking the time to complete this survey!

2015 Survey of E-rate Applicants

Demographics and Background

2. Which statement best describes your Category 2 funding requests?

- All school sites used all of their budget
- Some of our school sites used all of their budget, others used little or none
- We used budgets at a few of our sites
- We are planning to submit larger C2 requests in 2016 or 2017

2015 Survey of E-rate Applicants

Demographics and Background

1. My school or library filed for Category 2 funding this year.

- Yes
- No

2015 Survey of E-rate Applicants

Demographics and Background

3. Are you planning to request Category 2 funds in the future?

- Yes
- No

2015 Survey of E-rate Applicants

Demographics and Background

4. Considering all of your sites, when will you have exhausted the current Category 2 budget available to your organization?

2015
 2016
 2017
 2018
 2019

5. The last year my school or library received Priority Two funding was?

6. My school or library has a 1:1 or BYOD initiative for end-user devices.

Yes
 No

2015 Survey of E-rate Applicants

FY2015 Application Process and Reform

9. My FY2015 Form 471 applications took longer to prepare and file than previous years.

Strongly Disagree Strongly Agree

10. I felt adequately informed about E-rate 2.0 rule changes before I started the application process.

Strongly Disagree Strongly Agree

11. I sought assistance from USAC, a program expert, or a consultant during the application process.

Yes
 No

12. Overall, I feel that the E-rate program is _____ than in years past.

Significantly Less Complicated Significantly More Complicated

2015 Survey of E-rate Applicants

Demographics and Background

7. We depend on our Internet connection for? (check all that apply)

Testing
 Curriculum
 High-definition video
 Core administrative functions (SIS, etc)
 Other (please specify)

8. We have a contingency plan (such as a backup connection or other standard operating procedure) in the event that our primary Internet connection fails.

Yes
 No

2015 Survey of E-rate Applicants

Services and Infrastructure

13. Briefly describe how the reduction in E-rate support for voice services has affected your organization.

14. The number one product or service I would like to see made eligible for E-rate discounts is _____.

15. How critical is Wi-Fi in the classroom to meeting your educational goals?

Not Needed Absolute Requirement

2015 Survey of E-rate Applicants

Services and Infrastructure

16. How old is your Wi-Fi network?

- No Wi-Fi
- Older than 5 years
- 3 - 5 years
- 1 - 3 years
- New (within 1 year)

17. What is the approximate end-user device density on your network, including school owned devices and BYOD?

- Less than 1 device per 100 students
- One device per 50 - 100 students
- One device per 2 - 49 students
- One device per student
- Greater than one device per student

2015 Survey of E-rate Applicants

Services and Infrastructure

20. Assuming that the eligibility of Category 2 products and services does not change, how much would you anticipate that you would need to fully fund your C2 needs?

- \$150 - \$250 per student
- \$250 - \$350 per student
- \$350 - \$500 per student
- Over \$500 per student

21. Would you favor an overall annual funding cap that applied to total requests (both C1 and C2) if the amount were more than \$150 per student and you were allowed to allocate funds toward C1 or C2 purchases in any proportion you wish?

- Yes
- No

22. Why or why not?

2015 Survey of E-rate Applicants

Services and Infrastructure

18. Regarding the variety of options available to your school or library for high-speed Internet access:

Extremely Dissatisfied/Only One Option Available Extremely Satisfied/Many Options Available

19. The FCC has set a five-year funding cap of \$150 (pre-discount) per student for all Category 2 funding requests. Do you feel that the amount of the cap is

- Not enough to meet our C2 needs
- Sufficient to meet our C2 needs
- More than our C2 needs

2015 Survey of E-rate Applicants

Experience

23. I have been working with the program for _____.

- Less than 1 year
- 1 - 3 years
- 3 - 5 years
- Over 5 years

24. We rely on third-party assistance to assess our specific local area network (LAN) capacity and needs.

Never Always

2015 Survey of E-rate Applicants

Experience

25. Please order the following E-rate processes from most time consuming (1) to least time consuming (7).

☰	⬇	Technology planning and needs assessment
☰	⬇	Preparation of Forms 470 and RFPs
☰	⬇	Bid evaluation and vendor selection
☰	⬇	Contract negotiation and finalization
☰	⬇	Preparation of Form 471
☰	⬇	Program Integrity Assurance review (PIA)
☰	⬇	Post-commitment payment paperwork (invoicing, BEARs, and SPis)

2015 Survey of E-rate Applicants

Experience

27. What is the number one area of program rules/compliance that you would like to see clarified by the administrators?

28. How do you stay up to date on program rule and process changes? (Check all that apply.)

- Read/subscribe to USAC News Brief
- Attend USAC training sessions
- Read/subscribe to third-party newsletters/news feeds
- Attend third-party training sessions
- Review FCC Form instructions before filing

29. How many staff members in your organization are trained/have expertise in the E-rate program's rules and processes?

- 1
- 2 - 5
- 5 - 10
- More than 10

2015 Survey of E-rate Applicants

Experience

26. Please order the following topics based on your level of expertise, from most familiar (1) to least familiar (7).

☰	⬇	Product and service eligibility
☰	⬇	E-rate gift rules
☰	⬇	Discount rate calculation
☰	⬇	Competitive bidding requirements
☰	⬇	E-rate invoicing and payment paperwork
☰	⬇	Changes: SPIN changes, service substitutions, Forms 500, etc.
☰	⬇	Special reviews: Selective reviews, cost-effectiveness reviews, PGA, audits, etc.

2015 Survey of E-rate Applicants

Basic Information About You

Please provide basic information about your organization. Your response is confidential. This information will be used only for statistical analysis of aggregated data.

30. Your Billed Entity Number (BEN) _____ (Optional. For comparison of different applicant responses.)

31. Applicant Type (Optional)

- Individual school
- School district
- Library
- Library system
- Other

32. Applicant designation (Optional)

- Rural
- Urban

2015 Survey of E-rate Applicants

Thank you

Thank you for taking the time to complete this survey.

33. If you have other information that you would like to share, please feel free to enter it here.

E-RATE FUNDING YEAR 2015
ANALYSIS OF
FUNDING REQUEST DATA AND APPLICANT SURVEY

September 10, 2015

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