

Re: Comments on CIPA Implementation for the E-Rate
Docket Number 96-45

III. ISSUES FOR COMMENT

7. Because we may have more than one FRN associated with one 471 application, the certification needs to be obtained only for those FRNs where the statute applies. For example, our 471 application for telecommunication services has two FRNs: POTS and data circuits. In this case, the legislation would only apply to data circuits, as they are used to access the Internet. Therefore, the 486 form should have, for each separate FRN, a statement for whether the statute applies. If the statute does not apply to that specific FRN, the applicant does not need to file a certification for it but is required to file a certification if the statute applies to another FRN on the form.

9. If the legislation does not specify timing requirements for compliance, then there are no timing requirements.