

The E-Rate Form 470 is a dismal failure. It does not enhance competition and it should be abolished. Short of doing away with this form, the Commission should instruct the SLD to minimize its importance to the extent that E-Rate denials not result from any aspect of the Form 470 filing.

Nearly five percent of E-Rate applications are denied because of Form 470 issues. Many vendors use the Form 470 to make sales pitches unrelated to the services requested on the Form.

The SLD and Commission have enough tools to prevent waste, fraud, and abuse in the E-Rate program without reliance on specifics of the Form 470.

At the E-Rate Train the Trainer sessions, the notion of "economic reasonableness" was raised as a criteria for evaluation of funding requests. This test, specified in the Telecommunications Act, will give SLD all the necessary ammunition for eliminating wasteful applications as opposed to the Form 470.

Respectfully submitted this Seventh day of October, 2003

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