

Before the
Federal Communications Commission
Washington, D.C.

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<i>In the Matter of</i>)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
)	
Comment on Proposed Revisions to)	
FCC Forms 472, 473 and 474)	DA 05-513
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**ON-TECH COMMENTS
ON PROPOSED REVISIONS TO FCC FORMS 472, 473 AND 474**

Introduction

On-Tech Consulting, Inc. (“On-Tech”), a technology consulting firm based in Red Bank, New Jersey, assists schools and libraries in navigating the E-Rate process. We complete the Form 472 for dozens of applicants.

Comments on Form 472

Since On-Tech only serves applicants, our comments will focus on Form 472. Our principal concern is the new Certification F, which places an undue burden on educators applying for E-Rate funding.

A. Certification F

The new certification F in Block 3 requires applicants to “institute reasonable measures to be informed...that any person associated in any way with...the service

provider, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.” This certification should not be included on the Form 472 for two reasons.

First, an invoice for reimbursement is not the right time to remind applicants that they should not be dealing with unsavory service providers. This certification would be more appropriate on the Form 470, when applicants should be reminded to request that all bidders certify that they have not been convicted or held civilly liable for E-Rate offenses.

Second, it is unfair to expect a school administrator to” institute...measures to be informed” on the results of criminal and civil penalties imposed against service providers. Keeping track of which service providers should be barred from the E-Rate program is the responsibility of legal experts at the SLD and the FCC, not individual educators from each school district in the country.

B. Remittance Address

In Block 1, there should be an opportunity for applicants to identify a separate contact and address to which they would like reimbursement checks sent. Without a remittance address clearly stated, some service providers send checks to the person signing the BEAR, others send it to the address on their normal bills. The ability to choose a remittance contact and address would allow applicants to specify the appropriate person to receive reimbursement checks.

C. FCC Registration Number for Service Provider

Requiring applicants to supply the service provider's FCC Registration Number on each Form 472 imposes an unnecessary burden on applicants. Based on On-Tech's experience in trying to obtain this sort of information, the "Estimated time per response" for the Form 472 should be increased by 1 hour if applicants will have to obtain the service provider FCC Registration Number for BEARs. The SLD should collect information on service provider FCC Registration Numbers either directly from the service provider or from the FCC.

D. Layout of Header, Pages 2-4

The spaces at the top of pages 2, 3 and 4 for Entity Number, Form Identifier, and contact information are up to 6 inches long, but only about one-sixth of an inch tall. That height is not enough for standard 12-point type, much less hand-written text. If an applicant managed to squeeze text into the blanks, that text would be illegible after it had been faxed to the service provider and back. The height of the blanks should be at least doubled. Since the blanks do not need to be so long, a second column could be created.

Respectfully submitted,

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