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Funding Status – FY 2016 and FY 2017

Wave 29 for FY 2016 was released last Monday, January 9th, for a total of \$120 million. Funding for North Carolina was \$7.93 million for 14 applicants. Cumulative national funding through Wave 29 is \$1.87 billion, including \$77.6 million for North Carolina. Wave 30 is expected to be released this week.

Please note carefully USAC’s plan to update EPC entity profile data as discussed in its News Brief of January 13th (see below). Timing of the FY 2017 application window will be critically dependent on the implementation of this plan. Our best guess at the moment, assuming USAC’s updates are accomplished by the end of January and that USAC then gives applicants at least a month to review and further update their profiles, is that the window will open no earlier than March, 2017.

Updates on USAC’s E-Rate Productivity Center and Legacy System

Form 500 Limitations:

The Form 500, as implemented within EPC, has several significant drawbacks. Most importantly, USAC indicated last week that FRN changes can currently be made only for FY 2016. This limitation is not immediately obvious. To the contrary, as we pointed out in our [newsletter of January 2nd](#), there is an easy way to change the default “No” answer to the question “Is this FCC Form 500 being filed to request a change to an FRN filed for FY 2015 and prior?” All you have to do is check “Yes,” and upload a copy of the earlier paper version of the Form 500.

Form Details

Is this FCC Form 500 being filed to request a change to an FRN filed for FY 2015 and prior?

Yes ✓ No

Nickname *

To request changes for FRNs filed prior to FY2016, please complete an FCC Form 500 on paper and then upload it here. Download the form from the Apply for E-rate page on the USAC website at www.usac.org/sl. *

test.docx (16.31 KB) ×

FCC Form 500 Number *

We suspect that the upload feature for the older Form 500 was designed into EPC as a stopgap measure until an EPC-specific solution could be developed for earlier funding years. Unfortunately, the problem now is that OMB approval of the old paper Form 500 expired at the end of 2016. Even though you can complete and upload an older Form 500, USAC cannot process it. No timeline has been provided to upgrade the EPC Form 500 system to handle pre-2016 changes.

The most immediate and serious consequence of this limitation will be felt by applicants trying to cancel or reduce FY 2015 commitments associated with Category 2 expenditures in order to free up their budgets for FY 2017. Hopefully, a solution to the pre-2016 limitation will be available before reviews begin for FY 2017 applications.

Canceling or reducing FY 2016 commitments can be requested via the EPC Form 500, although it is not clear if USAC can yet process those requests. It should also be noted that the process for requesting FRN reductions for multi-line items with multi-entity can be burdensome. Each entity allocation for each line item must be calculated and entered separately. Unlike the original Form 471 application, no template is available to complete this process offline and upload the changes in bulk into the EPC Form 500. There is also a problem, hopefully soon to be fixed, if there are more than 10 line items for a given FRN.

Form 500 filers should also recognize that there is no print preview capability prior to certification. This is a particular problem if the form certifier is not the form preparer and would like to review the Form 500 before certifying it. For all but the simplest changes, the form preparer should take progressive screen shots.

New EPC “Records” Grid Views:

As discussed in USAC’s most recent News Brief (referenced below), the Records feature of EPC has been enhanced to provide a “grid view” list of:

- Applicant Entities
- FCC Forms 470
- FCC Forms 471
- Users

Clicking on any of these record types brings up a formatted list of additional information which can be filtered by the categories shown on the left hand side of the screen. To get a full list of filters, click “More...” The grid can also be sorted in ascending or descending order by the column headings. The following example is a portion of the unfiltered grid for Applicant Entities (showing, for all E-rate Trivia fans, the lowest assigned entity numbers).

Entity Number	Entity Name	Entity Type	State	Status
1	ROBINSON PARK ELEM SCHOOL	School	MA	Active
2	Roberta G Doering School / Agawam Middle School	School	MA	Active
3	AGAWAM HIGH SCHOOL	School	MA	Active
4	PHELPS, BENJAMIN J ELEMENTARY SCHOOL	School	MA	Active
5	JAMES CLARK SCHOOL	School	MA	Active
6	NORTH AMHERST BRANCH LIBRARY	Library	MA	Active
7	AMHERST REGIONAL JR HIGH SCH	School	MA	Active
8	WILDWOOD ELEMENTARY SCHOOL	School	MA	Active
9	AMHERST REGIONAL HIGH SCHOOL	School	MA	Active
10	FORT RIVER ELEMENTARY SCHOOL	School	MA	Active

Separately, USAC indicated that it is close to updating its legacy [Entity Search tool](#). Currently, the legacy database does not include any new entities issued beyond FY 2015. The updated tool will show all entities and will provide additional information.

E-Rate Updates and Reminders

Upcoming 2017 E-Rate Deadlines:

January 17 Form 486 deadline for FY 2016 funding committed in Wave 13. More generally, the Form 486 deadline is 120 days from the FCDL date or the service start date (often July 1st), whichever is later. This means that Form 486 deadlines for funding commitments received in later waves will follow at roughly one week intervals, including the following January deadlines:

Wave 14	01/24/2017
Wave 15	01/31/2017

Applicants missing these (or earlier) deadlines should watch carefully for “Form 486 Urgent Reminder Letters” (actually emails directing the applicants to EPC News Feed items). The Reminders will afford applicants with 15-day extensions from the date of the emails to submit their Form 486s without penalty (see [USAC News Brief of November 4th](#)). The first batch of Reminders is expected to be released soon.

January 30 Invoice deadline for FY 2015 non-recurring services. This is also the deadline for submitting Invoice Deadline Extension Requests (“IDERs”) for these services.

Applicants who had filed Form 500s to extend the service delivery deadline an additional 12 months (i.e., to September 30, 2017) will, upon approval of those extension requests, receive automatic one year invoice deadline extensions. The problem with this process is that USAC has not yet ruled

on all service delivery deadline requests. For an applicant in this position, we note the following:

1. Invoices for any eligible work done by the original service delivery deadline (i.e., September 30, 2016) should be filed by January 30, 2017.
2. If and when USAC approves the service delivery deadline request, the invoicing deadline will be extended to January 29, 2018.
3. An applicant is permitted one IDER, so it should be used wisely either this year or next.

February 27 Extended — and effectively final — invoice deadline for FY 2015 recurring service FRNs for approved IDERs granted last year.

USAC News Brief Dated January 13 – Profile Updates in EPC

USAC's [Schools and Libraries News Brief of January 13, 2017](#), outlines USAC's plan for updating EPC entity profile data before opening the Form 471 application window for FY 2017.

To understand the basis for this plan, it is important to understand a key characteristic of the EPC application filing system. Consortium and library applications are dependent on entity data associated with their related schools and school districts. It was this limitation that led to the dual window close in FY 2016. By closing the school/district application window first, USAC could lockdown the school entity profiles. Consortia and libraries could then complete their applications using stabilized school entity data.

Ideally, USAC would like to avoid dual application windows for FY 2017. Apparently, the best way to do this is to update all school/district entity data prior to opening the application window, then to lockdown all entity data during the window so that all applicants, including consortia and libraries, are working with the same entity data sets.

While USAC has not yet announced plans to lockdown entity data during the FY 2017 application window — it provides additional context in Friday's News Brief. In particular:

1. Once the second application window closed for FY 2016, USAC unlocked the EPC entity profiles. Since then, applicants have been able to update their profiles.
2. As USAC has been reviewing FY 2016 applications during PIA, it has been validating the entity data. USAC has been keeping track of FY 2016 corrections required, but has not been updating the EPC entity profiles themselves.
3. USAC is now ready to update those profiles in bulk, overriding the older data. But there is a problem. Although USAC's FY 2016 corrections may include better data than was initially used in the FY 2016 applications, it may not be as current as data that applicants have been entering in preparation for their FY 2017 applications. The newer applicant-provided data may include:
 - a. Updated total student counts affecting Category 2 budgets.

- b. Updated student eligibility data affecting discount rates.
 - c. Updated entity lists reflecting new and/or closed facilities.
4. To avoid updating more current applicant data with what may be outdated FY 2016 corrections, USAC has begun reaching out to applicants who changed their entity data after July 21st last year. If the applicants do not want their data updated with USAC's corrections, they are asked to contact CSB.
 5. Otherwise, USAC plans to update applicant entity data, presumably later in January or early in February. In the meantime, applicants are encouraged not to update their entity profiles.

Once USAC completes the EPC entity update, applicants will be advised to review their EPC profiles and to make any changes necessary for FY 2017. USAC has not indicated what the deadline will be for completing this process. We expect that applicants will be given at least one month.

If our assumption is correct that applicant profiles will again be locked down during the FY 2017 application window, the pre-window review and update period effectively define a new applicant deadline for this year's application cycle.

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Additional North Carolina specific E-rate information is available through our Web site — <http://www.e-ratecentral.com/us/stateInformation.asp?state=NC>. Note that this site provides easy access to formatted North Carolina applicant E-rate histories via the Billed Entity Number ("BEN") search mechanism in the upper left-hand corner. Detailed information can be obtained by "drilling down" using the links for specific funding years and individual FRNs.

For further information, follow E-Rate Central on Twitter, Facebook, and LinkedIn.   

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