

- Funding Status – FY 2017 and FY 2016
- Updates on USAC’s E-Rate Productivity Center and Legacy System
 - FY 2017 SPIN Changes
 - FY 2016 SCDER Submission and Review
- E-Rate Updates and Reminders
 - Upcoming 2017 E-Rate Deadlines
- USAC News Brief Dated August 18 – Form 498 Review Process

Funding Status – FY 2017 and FY 2016

FY 2017:

Wave 12 for FY 2017 was released Friday, August 18th, for a total of \$90.8 million. Funding for North Carolina was \$3.66 million for 25 applicants. Cumulative national funding through Wave 12 is \$881 million (\$737 million for Category 1, \$144 million for Category 2), including \$36.9 million for North Carolina. A scheduled release date for Wave 13 has not been announced.

FY 2016:

Wave 59 for FY 2016 was released on Tuesday, August 15th, for a total of \$0.00 — representing one denied application. As a result, cumulative national funding through Wave 59 remains \$2.91 billion, including \$104 million for North Carolina. A scheduled release date for Wave 60 has not been announced.

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

FY 2017 SPIN Changes:

EPC is not yet set up to accept, much less process, SPIN changes for FY 2017 FRNs. It is expected that SPIN change requests will be accepted in EPC by month end, but the system may not be able to report on approved SPIN changes until sometime in October.

Applicants needing to make SPIN changes who have not yet been funded are encouraged to submit those changes via RAL corrections which can be processed by PIA.

FY 2016 SCDER Submission and Review:

FCC rules require that special construction fiber systems are to be completed by the end of the funding year. Completion means that all fiber circuits have been installed and are lit. For applicants approved for, or still seeking, funding in FY 2016, the construction deadline was June 30, 2017. Recognizing that this might be a tight deadline, particularly for applicants with larger network projects and/or those receiving late Funding Commitment Decision Letters (“FCDLs”),

the FCC authorized USAC to extend this deadline upon request by one year. Initially, Special Construction Deadline Extension Requests (“SCDERs”) were to be submitted using a USAC template. The guidance was subsequently changed advising applicants to use the Form 500 instead.

Note that one unique aspect of the fiber completion deadline of June 30th is that it departed from the traditional September 30th deadline applied to all other non-recurring (i.e., one-time) services. We suspect that the June vs. September deadlines may have confused some applicants. Importantly, for any applicant who missed a fiber deadline and may have to appeal, there are indications that USAC too was confused. In particular:

- USAC News Briefs leading up to June 30th did not discuss the impending completion deadline nor the concurrent SCDER filing deadline.
- More importantly, USAC did not confirm the requirement to file a SCDER by June 30th until later in July. Indeed, the EPC version of the Form 500, which can be used to file a SCDER, still indicates that the deadline to request a service delivery extension for fiber construction is September 30th.

I want to request more time to get the services delivered and/or installed. ?

All service delivery requests must be submitted on or before September 30 following the close of the funding year for non-recurring services including special construction for fiber and self-provisioned networks.

Applicants who did submit SCDERs by June 30th are reporting differing review procedures based on FCDL and SCDER timing. Those filing SCDERs before receiving FCDLs have been receiving extension approvals without questions. Those filing SCDERs after receiving FCDLs are getting detailed review questions asking why the initial June 30th deadline could not be met. Even those receiving FCDLs late in the funding year or after June 30th are being asked, apparently with a straight-face, to “describe in detail why the construction couldn’t begin before the FCDL was issued.”

Applicants who need extensions, but did not submit SCDERs by June 30th, are in an interesting position. We have not yet seen how USAC plans to handle late-filed SCDERs. In the best of all worlds, given the misleading Form 500 guidance, the FCC will give USAC the authority to waive the June 30th deadline for those applicants submitting their SCDERs on or before September 30th. If not, these applicants will likely need to appeal. As part of the documentation for such an appeal, we recommend that applicants print a copy of their Form 500 SCDER submission — and do so now before USAC corrects the EPC Form 500 language.

E-Rate Updates and Reminders

Upcoming 2017 E-Rate Deadlines:

- August 25 Form 486 deadline for FY 2016 funding committed in Wave 44. 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 deadlines:

Wave 45	09/01/2017
Wave 46	09/07/2017
Wave 47	09/19/2017

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.

The earliest Form 486 deadline for FY 2017 will be Monday, October 30th.

Sept. 30 Service delivery deadline for the receipt of non-recurring services (i.e., installation or other one-time charges) for FY 2016. Requests to extend the service delivery deadline, if needed, must be made on or before this date.

October 10 USAC’s first annual fall applicant training session in Washington DC. Additional training sessions are planned in Charlotte, Minneapolis, and San Diego (dates not yet announced).

USAC News Brief Dated August 18 – Form 498 Review Process

[USAC’s Schools and Libraries News Brief of August 18, 2017](#), continues a Form 498 discussion begun in [last week’s News Brief](#). To review, the Form 498 is important to applicants planning to file BEAR invoices. The Form 498 provides USAC with the bank account information required to send reimbursement payments directly and electronically to the applicants. Applicants, who already have approved Form 498s, need read no further.

This week’s News Brief discusses how USAC reviews and confirms:

- The bank account number and bank routing number
- The FCC Registration Number (FCC RN, not BEN) and Federal EIN (tax ID)

The News Brief also discusses:

- How to ensure that entities who have changed status since the implementation of EPC can still submit BEARs
- How USAC notifies applicants that their Form 498s have been successfully reviewed and approved

USAC notes that the most common problems encountered during its review of Form 498s are:

- The bank routing number and the bank account number are transposed

- The applicant modified the Form 498 and did not re-certify it
- USAC has not yet received supporting documentation (typically a voided bank check)
- The information provided is not consistent with the information associated with the applicant's FCC RN

Newsletter information and disclaimer: This newsletter may contain unofficial information on prospective E-rate developments and/or may reflect E-Rate Central's own interpretations of E-rate practices and regulations. Such information is provided for planning and guidance purposes only. It is not meant, in any way, to supplant official announcements and instructions provided by the SLD, FCC, or NCDPI.

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.



If you have received this newsletter from a colleague and you would like to receive your own copy of the North Carolina E-Rate Forum, send an email to join-ncerate@lists.dpi.state.nc.us. Please include your name, organization, telephone, and e-mail address.

In compliance with federal law, the NC Department of Public Instruction administers all state-operated educational programs, employment activities and admissions without discrimination because of race, religion, national or ethnic origin, color, age, military service, disability, or gender, except where exemption is appropriate and allowed by law.