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Funding Status – FY 2017

Wave 26 for FY 2017 was released Wednesday, November 22nd, for a total of \$59.8 million. Funding for North Carolina was \$2.77 million for 2 applicants. Cumulative national funding through Wave 26 is \$1.84 billion, including \$55.9 million for North Carolina. Wave 27 is scheduled to be released on Friday, December 1st.

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

Form 486 Approval Update:

Form 486s passing a series of automated data validations are approved upon certification. Form 486s not passing these validation benchmarks are flagged for manual review. USAC only began processing its large backlog of Form 486s in late October. That process is ongoing. Applicants awaiting Form 486 approvals are most likely to receive inquiries in the following areas:

1. Pre-July Service Start Dates. Technically, an E-rate “service” cannot start before the funding year begins on July 1st. Fortunately — or unfortunately as far as E-rate forms are concerned — E-rate rules allow vendors to ship equipment and to begin installation work beforehand (January 1 for special construction of Category 1, and April 1 for Category 2). The purpose of allowing this early work is to permit the underlying services — the real “services” in the E-rate vernacular — to be available at the start of the funding year. For E-rate form purposes, dates before July 1 can be entered in a Service Start Date (“SSD”) field, but they are treated as errors. Form 486 approvals will require resetting the SSDs to July 1 or later.
2. “Early” filings. Generally, a Form 486 for any specific FRN should not be filed until the associated service has started. One exception is made so that applicants funded before the funding year begins can file early Form 486s to give their vendors time to setup

discounted billing as of July. The very first certification in the Form 486 deals with this exception. It asks early-filing applicants — and only early-filing applicants — to certify that their services will begin by at least July 31st. Other applicants — indeed, most applicants — filing regular Form 486s should not check this certification. If the early-filing box is incorrectly checked, applicants will be asked to authorize unchecking the box.

Note: While work can commence prior to July 1st of the Funding Year, USAC is not authorized to make payments until the start of the funding year on July 1st.

3. Incorrect CIPA certifications. The Form 486 contains several confusing, often intertwined, certifications regarding compliance with the Children’s Internet Protection Act (“CIPA”) that depend upon the services being funded and the applicants’ E-rate histories. Guidance on CIPA certifications comprise the majority of the [Form 486 Instructions](#). USAC reviewers should be able to step most applicants through the certification correction process.

Form 498 Validation Upload:

Form 498s, used to collect applicant bank account information for direct deposits of BEAR reimbursements, need to be manually validated before approval. The most common validation approach used by USAC is to ask for a copy of a voided check to confirm bank account and bank routing numbers. Applicants who have filed and certified Form 498s, but who are awaiting bank validation, can speed the process by submitting their voided check information upfront rather than awaiting a USAC request. The proper procedure for submitting unrequested verification information was covered in [USAC’s Schools and Libraries News Brief of October 6, 2017](#). It can be done electronically via USAC’s [Upload Documents](#) facility or via fax. In either case, applicants should include the billed entity name and number, the Form 498 ID of the certified form, and all contact information.

E-Rate Updates and Reminders

FY 2018 Filing Window:

The Form 471 Filing Window for FY 2018 has not yet been announced. For planning purposes, a workable assumption is that the Filing Window will open in mid-January and close in late-March.

As an important first step, USAC [announced](#) that it has completed the updates on applicant profiles based on PIA review of FY 2017 applications. Applicants can now review and update their entity profiles in EPC. This is the beginning of what in the past has been known as the “Administrative Window.” Once USAC begins accepting FY 2018 applications, entity profiles will be locked for the duration of the Filing Window.

Upcoming 2017 E-Rate Dates:

November 27 Form 486 deadline for FY 2017 funding committed in Wave 9. Upcoming FY 2017 Form 486 deadlines include:

Wave 10	12/04/2017
Wave 11	12/11/2017
Wave 12	12/18/2017

Applicants missing these (or earlier) deadlines should watch carefully for “Form 486 Urgent Reminder Letters” in EPC. The Reminders will afford applicants with 15-day extensions to submit their Form 486s without penalty.

December 13 Second FY 2017 Emergency Hurricane Application Window (opened November 13th) closes. For additional information, see USAC’s [Summary of the Orders and Important Deadlines](#).

Awaiting Formal Guidance on Form 470 Internet Options:

Status: Pending.

As discussed in our [newsletter of November 6th](#), USAC guidance on the proper Form 470 menu options to use when applying for fiber-based Internet services continues to evolve, albeit without any published updates. For now, our best advice is as follows:

- Always include the “Leased Lit Fiber” option, whether or not transport is required.
- Use either the “Internet Access & Transport Bundled” or the “Internet Access: ISP Service Only” option, as appropriate (the only two options that actually mention “Internet”).
- Use the “Narrative” section to fully describe what you really want. Better yet, upload a detailed RFP.

USAC Fall E-Rate Training:

USAC’s annual fall training sessions were held this year in Charlotte, Minneapolis, Portland, and Washington DC. Presentation slides for the most recent training are available [online](#). Other useful instructional videos and webinar recordings may be found in USAC’s [Online Learning Library](#).

USAC News Brief – None for the Thanksgiving Week

USAC did not issue a Schools and Libraries Program News Brief on Friday, November 24th, due to the Thanksgiving holiday.

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.



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