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## Funding Status – FY 2019 and FY 2018

### *FY 2019:*

The Form 471 application window closed Wednesday, March 27, 2019. Earlier that day, the FCC approved USAC’s PIA procedures for FY 2019 ([DA 19-218](#)). This is a key step that is required before USAC can issue the first funding wave for FY 2019.

Another important pre-funding step will be USAC’s release of a preliminary demand forecast for FY 2019. This typically occurs a few weeks after the close of the window. Based on USAC’s [FRN Status Tool](#), we estimate that the preliminary demand will be approximately \$2.90 billion. That figure is up about 5% from FY 2018 and is well within the \$4.15 billion funding cap for the year (see [DA 19-170](#)). Encouragingly, roughly a third of the applications, representing 8-9% of the requested funding, are already in “Wave Ready” status.

### *FY 2018:*

USAC issued Wave 51 for FY 2018 on Thursday, March 28<sup>th</sup>, for only \$147 thousand. Cumulative funding as of Wave 51 is \$2.18 billion, including \$70.1 million for North Carolina.

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

### *Late-Filed Form 471 Applications for FY 2019:*

Although the deadline for filing Form 471 applications for FY 2019 was March 27<sup>th</sup>, new applications can still be entered and certified in EPC. Late-file Form 471s are considered “Out-of-Window” and will not be considered by USAC unless the March 27<sup>th</sup> filing deadline is waived by the FCC on an application-by-application basis.

The FCC has routinely approved deadline waiver requests for Form 471 applications submitted within two weeks of the original USAC deadline. For FY 2019, this two-week period ends on

Wednesday, April 10<sup>th</sup>. FCC waivers for Form 471 applications filed after this date have occasionally been approved but only for “extraordinary” circumstances involving serious hospitalizations, deaths, or military deployments.

Instructions for “Submitting Window Waiver Requests” are provided in the final section of USAC’s [FCC Form 471 Filing](#) guidance as reproduced below. Applicants requiring a window waiver are encouraged to file their waivers as soon as possible to ensure their applications are put in-window in the next few months.

### **Submitting Window Waiver Requests**

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You must certify your FCC Form 471 by the close of the application filing window. If you certify your form after this date, it will be considered out-of-window and you are unlikely to receive funding.

FCC Forms 471 certified after the close of the application filing window will be put in an out-of-window status and will not be reviewed by USAC. For USAC to move these applications to an in-window status, the applicant must request – and the Federal Communications Commission (FCC) must grant – a waiver of the filing window deadline.

Note that USAC cannot approve appeals or waiver requests that ask for a waiver of the Schools and Libraries (E-rate) Program rules—you must file a request for waiver with the FCC.

To file a waiver request online at the FCC:

- Go to the FCC’s Electronic Comment Filing System (ECFS) ["Submit a Filing" page](#).
- Enter "02-6" in the "Proceeding" field.
  - Provide the information requested. (There are certain fields that are not applicable, such as the "Report Number" or "Bureau ID Number ".) Be sure to choose "WAIVER" or "PETITION FOR WAIVER" from the dropdown menu in the "Type of Filing" field.
- Click the text in the "Upload Documents" field to open an upload window and attach your appeal and any supporting documentation. You can also drag and drop your file(s) into the "Upload Documents" field.
- Review your work, make any necessary changes, and then submit your waiver request.

For detailed guidance on filing waiver requests with the FCC, go to the section titled "To File an Appeal with the FCC" in the [appeals guidance](#) document on USAC’s website. Note that you can file your appeal electronically using ECFS.

As of last weekend the FCC had already received over 45 waiver requests to accept FY 2019 out-of-the-window Form 471 applications (see [waiver examples](#)).

### *Unlocking of EPC Entity Profiles:*

USAC is expected to announce that it will unlock entity profiles in EPC later this week. The profiles were locked during the FY 2019 Application Window to freeze school entity data so as not to impact the application work of libraries and consortia.

It is important to note that any changes applicants now make in their EPC entity profiles will **not** automatically carry through to FY 2019 applications. To make entity changes that apply to pending applications, applicants must submit RAL modifications (see [USAC’s Schools and Libraries News Brief of March 22, 2019](#)).

### *URL Changes to Legacy Functions:*

USAC’s News Brief of March 29<sup>th</sup> (referenced below) notes that the web addresses of some legacy system forms and tools are being changed and updated. Access to the old addresses will be

automatically redirected to the new addresses, but users may find it more efficient to update older bookmarks. Last week's URL changes updated the web addresses for the Form 474 ("SPI"), the Form 486, and the Data Retrieval Tool ("DRT").

## E-Rate Updates and Reminders

### *Upcoming E-Rate Dates:*

- April 1            Deadline for submitting reply comments to the FCC's NPRM ([FCC 19-5](#)) to permanently eliminate the amortization requirement on special construction charges (see our [newsletter of March 25<sup>th</sup>](#)).
- April 8            Form 486 deadline for FY 2018 funding committed in Wave 35. More generally, the Form 486 deadline is 120 days from the FCDL date or the service start date (typically July 1<sup>st</sup>), whichever is later. Other upcoming Form 486 deadlines are:
- |         |            |
|---------|------------|
| Wave 36 | 04/15/2019 |
| Wave 37 | 04/19/2019 |
| Wave 38 | 04/26/2019 |

Note: Applicants missing any Form 486 deadline should watch carefully for "Form 486 Urgent Reminder Letters" in their EPC News Feed. These Reminder Letters afford applicants 15-day extensions to submit their Form 486s without penalty.

## USAC News Brief Dated March 29 – Next Steps After Filing Form 471s

[USAC's Schools and Libraries News Brief of March 29, 2019](#), suggests a number of steps applicants should take following the close of the FY 2019 application window, namely:

- Review your Form 471(s); submit RAL modification(s) as necessary to correct or update information such as:
  - Entity information.
  - FCC Registration Number.
  - Costs and cost allocations.
- Review and archive competitive bidding documentation.
- Prepare for PIA review.
- Monitor your contact email address and EPC account.

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*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](mailto:join-ncerate@lists.dpi.state.nc.us). Please include your name, organization, telephone, and e-mail address.*

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