- Funding Status – FY 2019

- EducationSuperHighway Releases 2019 State of the States Report

- E-Rate Updates and Reminders
  - Upcoming E-Rate Dates — Warning: See important October 28-29 deadlines
  - Improvements to the FCC's Electronic Comment Filing System

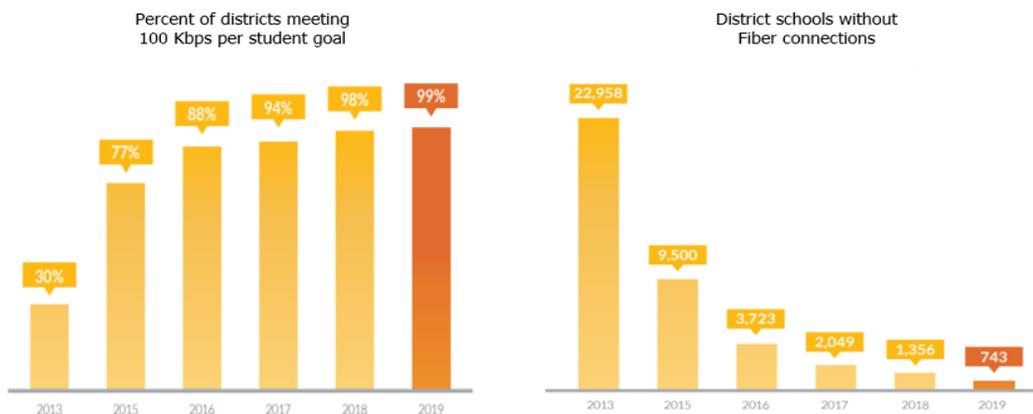- USAC News Brief Dated October 25 – EPC Profile Updates

Funding Status – FY 2019

USAC released Wave 30 for FY 2019 on Thursday, October 24th. Funding totaled $24.2 million including $198 thousand for two North Carolina applicants. Cumulative commitments through October 24th are $1.89 billion including $55.3 million for North Carolina.

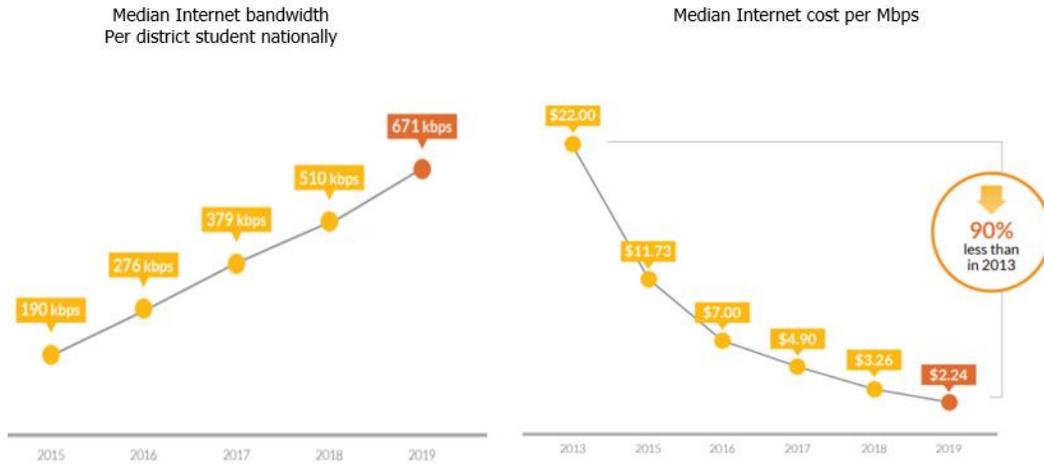## EducationSuperHighway Releases 2019 State of the States Report

EducationSuperHighway ("ESH") released its 2019 State of the States report (see online overview or download the full report). ESH, a non-profit formed in 2012, has been laser-focused on tracking and encouraging schools to reach the E-Rate 2.0 Internet and connectivity goals of:

- Short-term Internet access speeds of 100 Kbps per student
- Long-term Internet access speeds of 1 Mbps per student
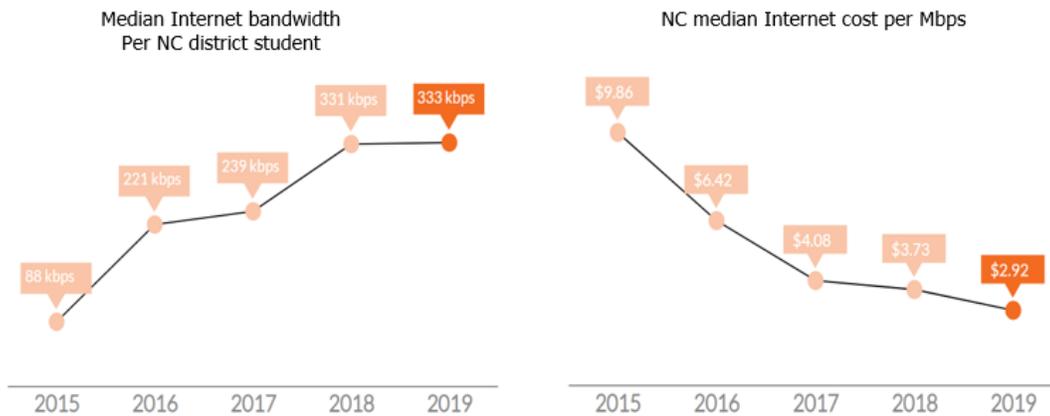- WAN connectivity scalable to 10 Gbps

As reflected in its new 2019 report, based largely on data culled from USAC's E-rate data and validated by ESH, 99% of the nation's school districts have reached or exceeded the short-term Internet goal. By ESH's count, less than 750 district schools nationwide do not have fiber connections. The improvement over the past five years, driven largely by E-rate funding and state initiatives, has been impressive.

Equally impressive has been the decline in the cost of Internet access per megabit as Internet speeds have increased.

Median Internet bandwidth
Per district student nationally

Median Internet cost per Mbps

In North Carolina, all district students have access to at least 100 Kbps Internet albeit at a median bandwidth below the national level. Costs have also fallen dramatically but are still a bit above the national average.

Median Internet bandwidth
Per NC district student

NC median Internet cost per Mbps

National and state data is informative, but what may be most interesting to individual E-rate applicants is the detailed data provided in ESH's State of the States report on specific school districts and the information available on other districts in the same geographic areas. Comparative Internet pricing data, in particular, can be invaluable to applicants competitively bidding and negotiating new contracts. Although regional pricing on Internet service is available through the ESH website only for public school districts, we believe that independent schools and libraries can also benefit once they understand district pricing in their areas.

To access district pricing data, use ESH's newly updated Compare & Connect K-12 tool; start by entering a district's name.

The map illustrated below shows a district (marked with a black star) currently paying $3.60/Mbps. The map initially shows three other districts in the area "with similar [Internet] budgets that are getting more affordable bandwidth." To see other districts in the area, whether with higher or lower Internet rates, click on the "Show All Nearby Districts."

To learn more about the services being received by the lower cost districts (e.g., the one paying $0.78/Mbps), mouse over the symbol to get the district name and search for that district. Scrolling down from the displayed map shows the current providers, pricing, and contract terms for the Internet and transport services being received by the lower cost district.

EducationSuperHighway has done a tremendous amount of work to mine critical data from USAC's IT systems, clean it up, and organize it to provide important and useful information for the E-rate community. Use it well!

E-Rate Updates and Reminders

Upcoming E-Rate Dates — Warning: See important October 28-29 deadlines*:*

October 28	Invoice deadline for FY 2018 recurring services. Note: For applicants and service providers unable to submit their invoices by this date, October 28th is also the deadline for filing 120-day Invoice Deadline Extension Requests ("IDERs").
October 28	Due date for nominations of six positions on the USAC Board of Directors (see DA 19-835) including the slot reserved for a library representative and one of the two slots reserved for school representatives.
October 29	First Form 486 deadline for FY 2019, covering funding committed in Waves 1-10. More generally, the Form 486 deadline is 120 days from the FCDL date or the service start date (typically July 1st), whichever is later. The upcoming Form 486 deadlines are:

Waves 1-10	10/29/2019
Wave 11	11/04/2019
Wave 12	11/08/2019
Wave 13	11/15/2019

October 31 – November 21	Remaining USAC 2019 fall applicant/tribal training sessions (see USAC's 2019 Training webpage for a schedule of the sessions).
October 31	Deadline for submitting initial FCC comments on improving the Form 470 drop-down menus (DA-986). Reply comments are due November 15th.
October 31	Proposed deadline to update the business type for existing Form 498s. (See our newsletter of August 19th.)

Improvements to the FCC's Electronic Comment Filing System:

The FCC's Electronic Comment Filing System ("ECFS") provides on ongoing record of all important material filed with the FCC — comments on FCC proceedings, appeals and waivers, records of *ex parte* meetings, etc. Here's a small sampling of the types of E-rate filings submitted to the FCC during only a part of one day in mid-September:

ECFS was created in 1998 and has been modified incrementally over time in response to the increased emphasis on electronic filing. As of 2016, the system is on its third generation (ECFS 3.0). An overview of the ECFS history and plans for a fourth generation was provided to the U.S. Senate last week in a statement by Ashley Boizelle, the FCC's Deputy General Counsel. Ms. Boizelle's concluding comments may be of interest to those who have spent a good part of their lives reviewing FCC comments.

Historically, the FCC's approach to the comment process has been to err on the side of openness and accessibility. We have generally taken the view that more robust public participation and a complete administrative record are features of rulemaking, rather than flaws. But we have always understood that there is a tradeoff involved in this approach: the easier it is for people to comment on our proposed rules, the easier it is for bad actors to abuse the system. We have endeavored to mitigate some of the opportunities for mischief by ensuring sufficient network capacity to prevent system disruptions and optimizing ECFS's search capabilities so that those looking to review and respond to substantive comments can find them.

To that end, over the past three years, the FCC's Information Technology staff has made a number of improvements to ECFS. These improvements include, among other things, optimizing search result queries to make them faster and more accurate and adding data validation checks to ECFS's web interface to ensure only permissible data is submitted into the application.

Even more importantly, we have launched a fulsome review to overhaul the system. A cross-bureau working group has been tasked with leading this effort. They are now in the process of convening roundtables with various external stakeholders to ensure that the next generation of ECFS is both accessible and secure. Among other things, we are exploring changes like the implementation of CAPTCHA to distinguish human comment filers from automated submissions, tools to authenticate identities, the creation of docket home pages that highlight comment deadlines and links to major filings, and the elimination of ECFS's open API to limit bot activity in agency proceedings.

USAC News Brief Dated October 25 – EPC Profile Updates

USAC's Schools and Libraries News Brief of October 25, 2019, reminded applicants that the FY 2020 administrative window (announced in its News Brief of October 11th) is now open. The window provides a limited opportunity for applicants to update the entity data in their EPC profiles. The administration window will remain open until just before the Form 471 application window opens for FY 2020 (probably in early January). At that point, EPC entity profiles will be locked for the duration of the application window.

The News Brief reminds:

- All billed entities to review, verify, and update address and contact information for all associated entities.
- School districts and independent schools to update student counts.
- Library systems and independent libraries to review square footage and IMLS code information.
- Consortia to review their lists of consortium members (and to encourage their individual members to review and update their own profiles).