

2nd FY2020 Form 471 Window

Great News!

Background:

SECA requested additional E-Rate funding from the FCC to help schools that experienced increased Internet/bandwidth cost due to COVID-19.

- Initial letter submitted on August 3rd
- Survey leased (Aug. 24-25), supporting data submitted August 27th

On 9/16/2020 the FCC released an Order to open a 2nd FY2020 Form 471 filing window to allow schools (libraries do not qualify) to seek additional funding for **Category 1 connectivity**.

The data the FCC used to support this decision came directly from your responses to the survey we released in August!



If you have already increased your Internet/data transmission service beyond what was requested on your original FY2020 Form 471, or will increase your bandwidth, please plan on applying.

Heads Up!! It is be a very abbreviated filing window!



Filing Window Details:

- The filing window opened on September 21st, 2020.
- The deadline for filing will be Friday, October 16th, 2020.



- Both Internet and WAN bandwidth can be included, but no Category 2 equipment/services.
- Only on-campus connectivity is eligible.
- Services from July 1, 2020 June 30, 2021 are eligible. If you increased Internet bandwidth prior to July 1, those costs would not be eligible because they fall outside the FY2020 funding year.

Filing Window Details:

- While most schools will obtain the additional bandwidth from their existing service provider, you may use a different provider if your existing service provider is unable to provide sufficient bandwidth to meet the demand.
- The opening of the FY2021 "Admin Window" (where schools update their enrollment/NSLP data) will be delayed by a few weeks due to this new application window.

Filing Window Details:

- There is no requirement to competitively bid (file a new Form 470)
 for the new or upgraded services, providing:
 - 1. You have a previously filed Form 470 for the services (even if the bandwidth is different)
 - 2. You received a FY2020 FCDL for C1 Internet access/data transmission services (or you have an application pending) that relied on that FCC Form 470, and
 - 3. The funding request submitted during the 2nd filing window must contain a per meg cost that is equal to or less than the original contract.
 - Or, if the price per meg is higher than the original contract, USAC will limit the funding commitment to the price per meg in the original contract.

Filing Window Details:

- If a school increases their bandwidth beyond what was listed as the "Max Capacity" in the original Form 470 scope, they must competitively bid the additional bandwidth for FY2021.
 - For example, if the original 470 was posted in 2019 and was for 1Gb of Internet, and the school increases it to 2Gb of Internet due to COVID and wants to keep the 2GB of Internet bandwidth for FY2021, they would have to post a new 470 for FY2021 that covers the 1 GB.

Form 470 Sample

Services Reques	ted						
Category 1: Data Transmiss	ion and/or Internet Access	1					
Туре	Function	Function Other Description	Number Entities	Quantity	Unit	Min Capacity	Max Capacity
Data Transmission and/or Internet Access	Leased Lit Fiber (with or without Internet Access)		3	1	Circuits	100 Mbps	1 Gbps

Looking Ahead for FY2021:

- You must competitively bid the additional bandwidth for FY2021 if either of these occur:
 - The increase in bandwidth is beyond what was in the original Form 470 scope and/or
 - The increase required a new contract to be awarded (whether you changed service providers or not)
- If the increase required a new **multi-year** contract, you may use the new contract as a bid response will you file the Form 470 for FY2021.
 - You will need to compare this cost to other bids received. If you continue with this contract, put something in writing. This date will become your new contract award date.

Options for Increasing bandwidth:

- If your current contract allows for the bandwidth increase, notify your service provider of your intent to increase.
 In most cases this is handled with a contract amendment.
- Whether you signed a new contract or have an amendment to an existing contract, USAC recommends creating a new contract record in EPC before starting the new FCC Form 471 so you can cite that contract record.

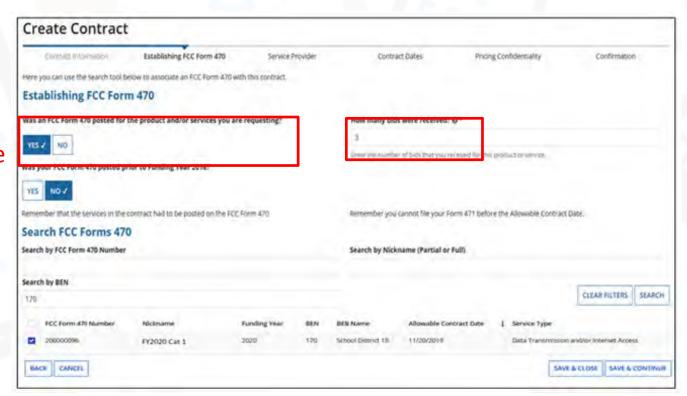
More on contracts:

If you're uploading a previously awarded contract w/ an amendment (upload both), reference the 470 you used when the contract was originally awarded, and the original award date, not the amendment date.

If it's a new contract where you didn't file a new Form 470, still answer "YES" indicating you did and reference the same 470 you used when you filed your earlier FY2020 FRN. You can enter "1" for bids

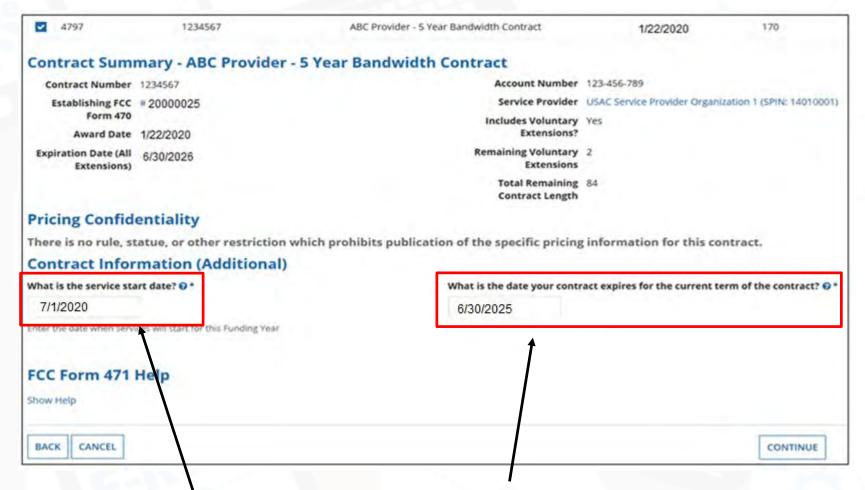
received.

If you answer "NO" on the 470?, you can get an error message in the 471, preventing you from submitting.



FRN Contract Summary

Dates to Use In the New FRN



Enter the service start date. The default is 07/01/2020 for FY2020.

Enter the date the contract expires for the current term of the contract, <u>BUT if this is a new contract</u> where no 470 was filed or bandwidth exceeds your original 470, where you will need to rebid for FY2021, enter 6/30/2021.

Form 471 Requirements:

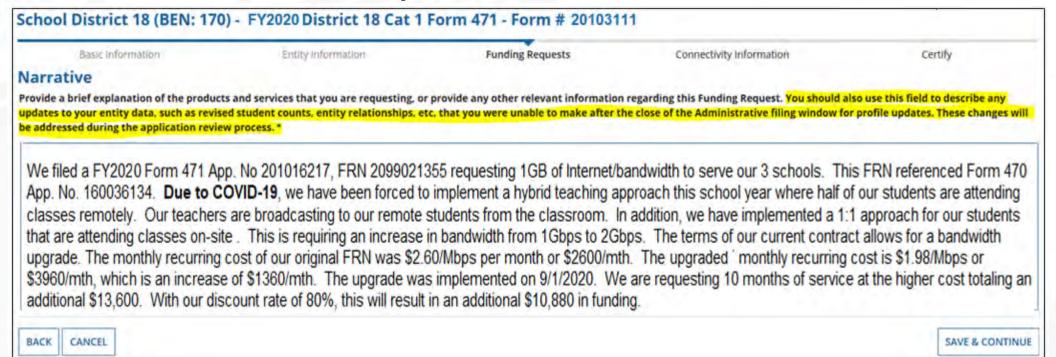
- Applicants that wish to apply in the 2nd Form 471 window must submit the following information in the narrative section of the new FCC Form 471 funding request:
 - The original FY2020 Form 471 and FRN numbers that previously relied on the Form 470;
 - A statement confirming that the requested E-Rate funding is for additional bandwidth needed as a result of COVID-19.
 - Additional information about the price per meg of the original and new funding requests and highlight any difference in cost.
 - Clearly indicate if the 2nd-window request is upgrading the bandwidth and/or other services in the original request or is an additional separate circuit being installed.

*This information will assist USAC to complete any necessary cleanup on the backend (amending your current FRN, creating a new FRN, etc.)

From the FCC

From USAC

Form 471 Narrative example:

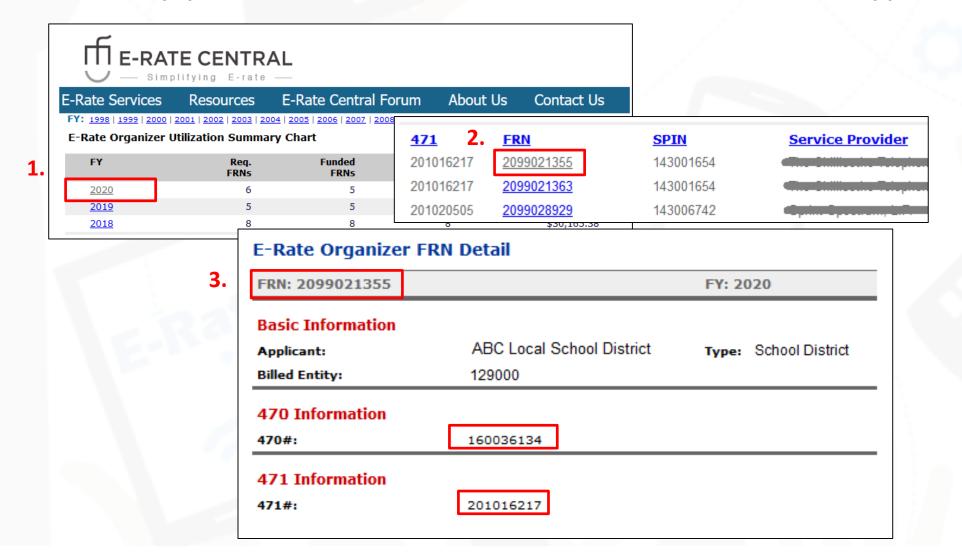


- ✓ Original FY2020 Form 471 and FRN numbers that previously relied on the Form 470;
- ✓ A statement confirming that the increase is needed as a result of COVID-19;
- ✓ Additional information about the price per meg of the original and new funding requests;
- ✓ Indicate if the 2nd-window request is upgrading the bandwidth or is an additional separate circuit being installed. If you must go with a **different provider** for a separate circuit in order to get to the bandwidth amount needed, state this is not a duplication of service, but needed to get to the bandwidth amount required.

Quick place to get the numbers needed:

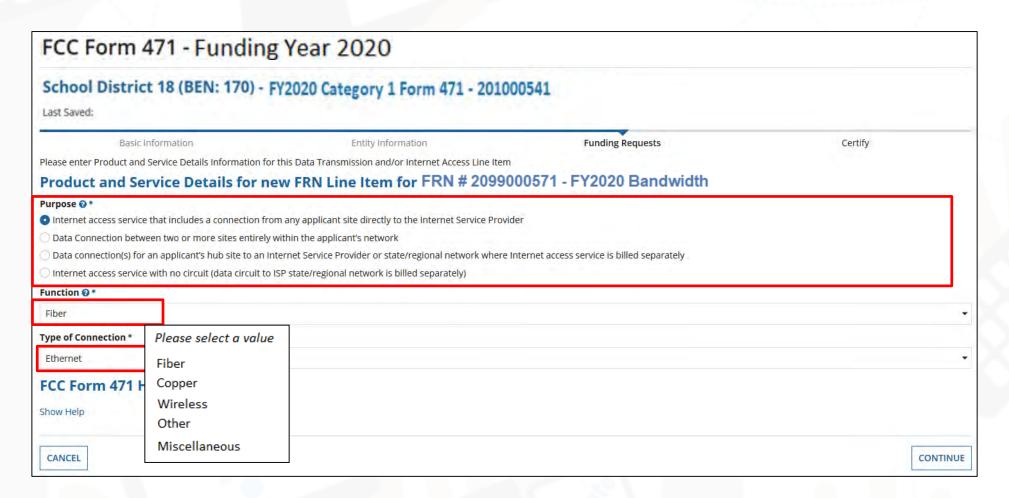
www.e-ratecentral.com

Search by your BEN, click on "2020" and then the FRN hyperlink

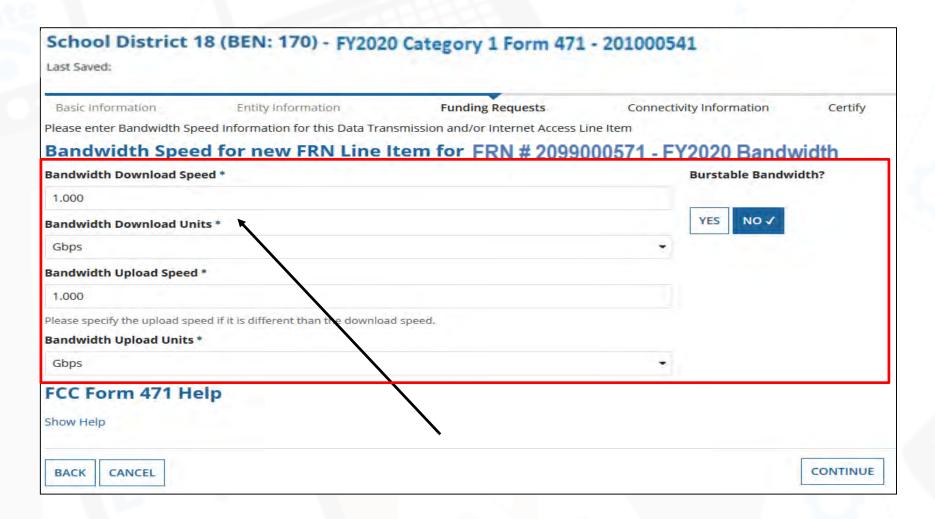


Product/Service Details

In the FRN Detail section, select the "Purpose", "Functions", and "Type of Connection" like normal.



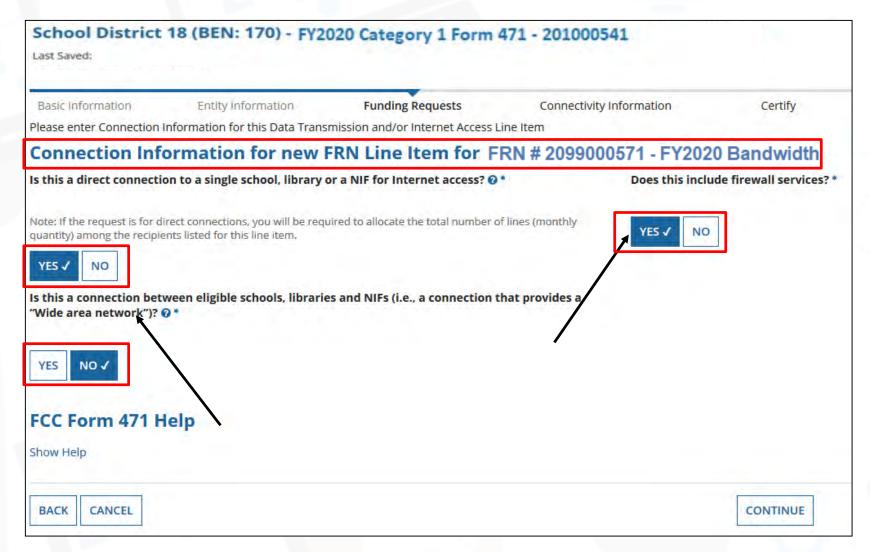
Bandwidth Speeds



Enter the increased Bandwidth Speed Information, indicating if the bandwidth is burstable, then click on "Continue".

If you are unsure of the information, contact your Service Provider

Connection Information



Provide Connection Information, and firewall inclusion.

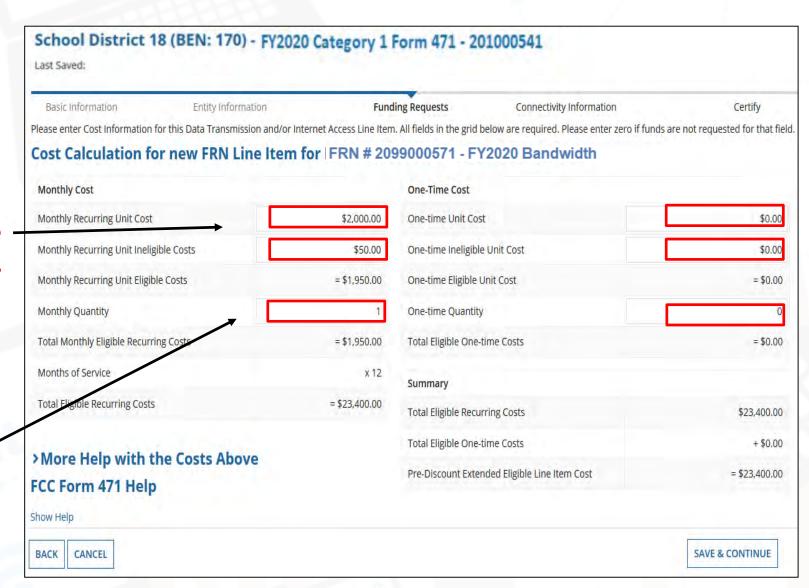
Note: The system will not allow you to answer "Yes" to both questions displayed in the left-hand column above. If you do, you will receive an error message.

Cost Calculations

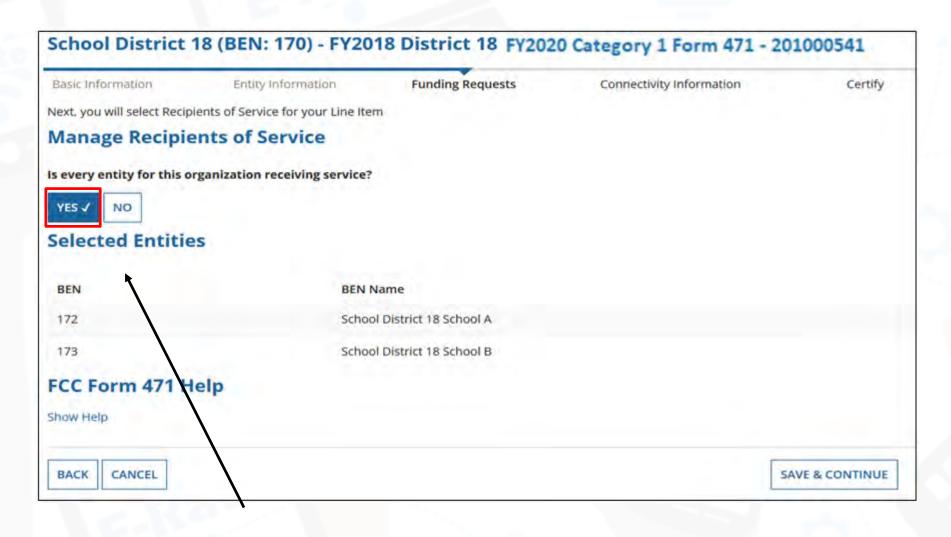
Enter cost information.

Enter the full monthly cost of the upgrade, not just the incremental amount.

"Cost" is listed per unit. The "Monthly Quantity" indicates the total number of units included in the service, such as the number of circuits. The table calculates the total costs.



Manage Recipients of Service – Shared Service



Indicate which entities will receive the upgraded service for this line item. If all entities will, such as a single circuit serving a K-12 building, click on "Yes.





1. When must an applicant post a new form 470 and how long must the bidding period be?

- Only when state/local bidding requirements mandate a competitive bid. In that case, the length of the bidding period shall be prescribed by state/local requirements.
- There is no minimum waiting period per the E-Rate program.

2. May an applicant post a Form 470 even if not required by local laws?

• You may but any Form 470 posted for the supplemental filing window is only for services through June 30, 2021.

3. What steps should be taken by applicants with *pending* FRNs for bandwidth who wish to increase their bandwidth?

- They must submit a new Form 471 application for the additional bandwidth during the 2nd filing window.
- They must not rely on the RAL correction process to increase their bandwidth.
- State in the narrative the 471 and FRN numbers and USAC can make the necessary corrections for you.



4. Which Category 1 services/equipment are eligible for funding?

- All of the services/equipment listed in the Form 470 drop down menu including WAN circuits and C1 equipment that is needed to make broadband functional and is needed for additional bandwidth arising from COVID. All of these services/equipment are exempt from competitive bidding.
- NRC (non-recurring cost) charges may be eligible, if needed for additional bandwidth for a school.
- If the Category 1 service/equipment is needed in order to meet the school's bandwidth needs arising from COVID-19, then the service/equipment are eligible under the Order.
- No Category 2 funding is eligible under the 2nd filing window. Any Category 2 Form 471 requests must be submitted as a late Form 471 and a waiver of the deadline must be submitted to the FCC. If an applicant submits a supplemental application that does not meet the parameters of the Order, the application will be denied. The only equipment that is eligible for funding under this Order is C1 network equipment.



- 5. May an applicant that forgot to file in the original FY2020 application window obtain funding for the omitted FRN by filing a Form 471 in the 2nd filing window?
 - No, they may not.
 - Their potential recourse is to file a late Form 471 and request a waiver from the FCC.
- 6. When must applicants create new Contract Record in EPC for their new/amended contracts prior to filing their Form 471 applications during the 2nd filing window?
 - When the existing contract allows for the expanded service as an amendment.
 - If the increase required a new contract to be awarded



- 7. What steps should be taken by schools that already submitted a late Form 471 for supplemental Internet and submitted a request for waiver of the window deadline?
 - If they are already submitted a waiver request, the best thing to do is to submit a
 letter in the FCC docket withdrawing the request (include the waiver request in the
 letter so it's easy for the FCC to ensure that they are examining the correct request for
 waiver).
 - If they already submitted a late 471 application for additional bandwidth, there is nothing they HAVE to do on USAC's side of things. They are not REQUIRED to cancel the original, late-filed application, but they still must submit a new Form 471 in the 2nd window if they want to apply for that funding. If the applicant WANTS to cancel their original, late filed application they may, but it is not a REQUIREMENT. It would be helpful for the applicant to note that they had previously filed a late Form 471 and provide that 471 number as part of their FRN narrative in their new Form 471 that is submitted during the 2nd filing window.
 - The important thing is that the applicant MUST file a new Form 471 application during the 2nd filing window.



Contact Information

E-Rate Support and Information

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