- FY 2022 Application Window

- Further ACP Comments Filed

- Funding Status for 2021-2022
    - E-Rate
    - ECF

- Updates and Reminders
    - Upcoming Dates
    - USF Quarterly Contribution Factor for 2Q22
    - FCC Announces Inflation-Based E-Rate Cap for FY 2022

- USAC ECF Newsletter Dated March 15 – Nothing New, Again

- USAC E-Rate News Brief Dated March 17 – Multiple Application Topics

FY 2022 Application Window

The FY 2022 Form 471 Application Window will close on Tuesday, March 22, 2022, at 11:59 p.m. EDT. February 22nd was the last possible day to file a Form 470 for FY 2022 and still meet the 28-day posting requirement.

Funding Status for 2021-2022

E-Rate:

Wave 49 for FY 2021 was released on Thursday, March 17th, for $12.3 million, none for North Carolina. Cumulative commitments are now $2.63 billion including 84.3 million for North Carolina. Nationwide, USAC has funded 98.6% of the FY 2021 applications representing 94.4% of the requested funding.

ECF:

As of Wave 11, cumulative ECF commitments are $4.67 billion including 150 million for North Carolina. Nationwide, USAC has funded 91.0% of filed applications. Authorized disbursements as of last Friday totaled $477 million.

Further ACP Comments Filed

Last week marked the close of the initial comment period of the FCC's Further Notice of Proposed Rulemaking ("FNPRM") on the Affordable Connectivity Program ("ACP"). From the perspective

of schools and libraries, already being funded through the E-rate and ECF programs, ACP developments may be important in two respects, namely:

1. Prospectively, as the ECF program draws to a close, during or shortly after the 2022-2023 school year, ACP discounts may be a way to provide affordable home internet services for low-income families with students and patrons currently covered by reimbursed ECF services.
2. Properly structured, ACP discounts for low-income housing buildings and homeless shelters would permit bulk subscription internet services for student and patron families that have otherwise been difficult to serve under the ECF program.

In this respect, the most expansive set of comments proposing Pilot Programs for better administrating ACP discounts for low-income housing complexes and homeless shelters were filed jointly by E-Rate Central and Westhab (Westhab is the largest non-profit provider of affordable housing and support services in Westchester County, NY). Other important comments on these points were filed by California Emerging Technology Fund ("CETF"), Microsoft Corporation, and Stewards of Affordable Housing for the Future ("SAHF").

CETF asked the FCC to "not adopt overly strict measures that make enrolling and engaging in ACP difficult for school districts, schools, and parents." CETF also argued that that the ACP rules should "[e]xplicitly include homeless centers as eligible for support under multiple dwelling unit ("MDU") provisions. The MDU definition and eligibility should include multi-family serving organizations and local government entities that purchase in bulk."

Focusing specifically on MDUs administered under Federal Public Housing Assistance ("FPHA") programs, which was a key part of the FNPRM, several responders urged ACP building management control. The New York Public Service Commission, for example, stated that:

> Moreover, the FCC should examine means to simplify ACP enrollment for FPHA beneficiaries and other beneficiaries of federal or state programs that guarantee ACP eligibility. Such beneficiaries should have a streamlined means to enrollment that can be managed and advanced at the local or state level, in part, utilizing the increased access to relevant tools as outlined above. For example, a state housing provider could be able to administer ACP enrollment locally, requesting simple documentation from FPHA beneficiaries, then enrolling such individuals collectively or on a simplified or expedited basis.

Reply comments on the ACP FNPRM are due April 15th. Hopefully we'll see additional support for low-income and homeless MDUs.

In a separate, but potentially related action last week, the FCC opened a proceeding on "how to prevent and eliminate digital discrimination to ensure that everyone has equal access to broadband internet access service…regardless of income level, ethnicity, race, religion, or national origin."
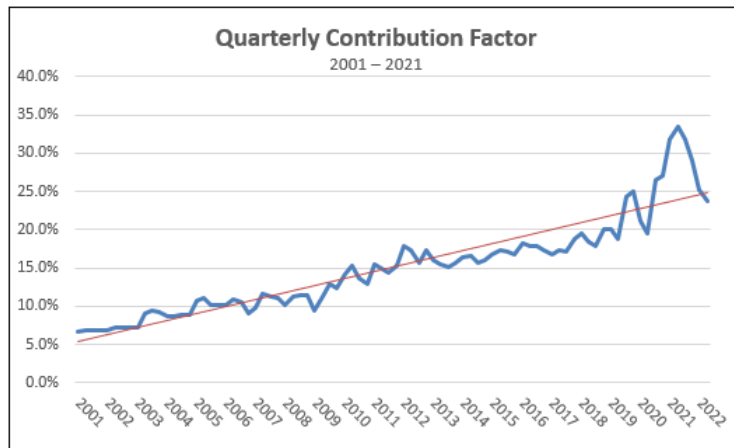
Updates and Reminders

Upcoming Dates:

March 22   FY 2022 Form 471 Application Filing Window closes at 11:59 p.m. EDT.

| March 24 | Form 486 deadline for FY 2021 covering funding committed in Wave 33. More generally, the Form 486 deadline is 120 days from the FCDL date or from the service start date (typically July 1st), whichever is later. Upcoming Form 486 deadlines are: |

	Wave 34	04/01/2022
	Wave 35	04/08/2022
	Wave 36	04/15/2022

| April 15 | FCC reply comments due on the Further Notice of Proposed Rulemaking for the Affordable Connectivity Program ("ACP") (FCC 22-2). (See article above). |

| April 27 | FCC comments due on the FCC's proposal to create an E-rate competitive bidding portal (FCC 21-124). Reply comments are due May 27th. Note: These are new extended deadlines granted last week by the FCC in response to a request filed by a coalition of 27 E-Rate stakeholder organizations. |

| May 26 | Extended FY 2022 application deadline for new Tribal libraries (see DA 22-231). |

USF Quarterly Contribution Factor for 2Q22:

The FCC announced that the Proposed Second Quarter 2022 Universal Service Contribution Factor will be 23.8% (see DA 22-268). As shown below, the contribution factor is down again for the fourth straight quarter from the 2Q21 high of 33.4%.

USF funding remains problematic. Although the recent quarterly drops in the contribution factor are welcome, declines in the underlying interstate end-user telecommunications revenue base continue — down 4% in this quarter alone.

FCC Announces Inflation-Based E-Rate Cap for FY 2022:

The FCC announced that the E-Rate funding cap of $4.456 billion for FY 2022 based on an inflation-adjusted increase of 4.2% from FY 2021 (see DA 22-271). Assuming that total E-rate demand for FY 2022 will be closer to $3 billion, as it was for FY 2021, the E-rate cap

announcement is an administrative nicety, one small step preceding the first funding wave expected in mid-April.

USAC ECF Newsletter Dated March 15 – Nothing New, Again

USAC's Emergency Connectivity Fund Program Newsletter of March 15, 2022, repeats the same information from last week's newsletter and the week before.

USAC E-Rate News Brief Dated March 17 – Multiple Application Topics

USAC's Schools and Libraries News Brief of March 17, 2022, discusses a series of E-rate topics, primarily related to the FY 2022 application window, including the following:

- The FCC granted a waiver extending the FY 2022 application window for any application listing one or more new Tribal libraries as recipients of service (see our newsletter of March 14th). The extended deadline is May 26th (making April 28th the last possible date to file a Form 470).
- USAC's Customer Service Center will remain open this Monday until 10:00 p.m. EDT, and all the way up until the close of the window on Tuesday at 11:59 p.m. EDT.
- Additional last-minute tips for the Form 471 application window:
  - Returning to an incomplete Form 471.
  - Certifying your Form 471.
  - Correcting information on a Form 471 after it is certified.
  - Guidance on advanced installation of non-recurring services.
  - Contacting the Customer Service Center ("CSC").
- How to use the "interim SPIN" (143666666) on Form 471 submissions.
- E-Rate program document retention requirements.