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## Funding Status for E-Rate and ECF

### *E-Rate for FY 2022:*

Wave 24 for FY 2022 was issued on Thursday, September 29<sup>th</sup>, for \$13.2 million including \$1.49 million for North Carolina. Cumulative commitments to date are \$2.54 billion including \$64.3 million for North Carolina. Nationwide, USAC has funded 95.8% of the FY 2022 applications representing 82.9% of the requested funding.

### *ECF for 2021-2023:*

Total commitments for all three ECF windows are \$5.76 billion including 164 million for North Carolina. Nationwide, USAC has funded 96.4% of the applications from ECF windows one and two and 32.4% of applications from ECF window three. Total disbursements as of last Friday were \$1.89 billion.

## USAC ECF Webinar Pointers

USAC hosted two webinars last month, both reviewing the same material on the ECF invoicing process. From our perspective, the three most important points were as follows:

- Missing service dates were the most common problem encountered by USAC reviewers. Specific dates are needed to assure that reimbursements are provided only for equipment and/or services received within the ECF funding period. If a USAC reviewer is unable to verify the date(s) for which the equipment or services were provided, reimbursements will be delayed until clarification is received. Clarity is particularly important when an invoice includes multiple months of service.

As an aid to providing the necessary information, USAC has developed an optional “Service Invoice Summary” form that can be completed and uploaded as a part of the invoice filing process. The following is a sample of the new form, shown for two months service. Note the highlighted fields showing both the service start date and the service end date.

**Request for Reimbursement  
Service Invoice**

Please provide the following information for each attached invoice.  
The sum of all the invoices should equal **Amount Billed to USAC** in your FCC Form 472/474

<b>Service Start Date:</b>	
<b>Service End Date:</b>	
Number of Lines	
Unit Price/Line	
Total:	\$0.00
Number of Line	
Unit Price/Line	
Total:	\$0.00
Number of Line	
Unit Price/Line	
Total:	\$0.00
Total for Billing Period:	\$0.00
<b>Service Start Date:</b>	
<b>Service End Date:</b>	
Number of Lines	
Unit Price/Line	
Total:	\$0.00
Number of Line	
Unit Price/Line	
Total:	\$0.00
Number of Line	
Unit Price/Line	
Total:	\$0.00
Total for Billing Period:	\$0.00
<b>TOTAL AMOUNT BILLED TO USAC:</b>	<b>\$0.00</b>

Line Item 1 | **Line Item 2** | Line Item 3 | +

The optional form is available in Excel format on USAC’s [ECF website](#) under the [Reminders and Tips](#) subsection in the Reimbursement section.

- USAC stated that its review procedures include verifications of Unmet Need on a sample of invoices received. Sampling is required on a “blend” of random invoice selections and dollar-value thresholds. USAC indicates that the information requested on each sample may be different, thus an applicant or service provider submitting multiple invoices for different time periods may be sampled more than once. Although unstated by USAC, the sampling process suggests that service providers submitting SPI invoices may need to reach out to their applicant clients for Unmet Need documentation.
- USAC acknowledged that some applicants and service providers may be experiencing difficulties in registering or updating ACH-EFT banking information in SAM.gov and that the processing may take several weeks. Until that information is updated, USAC’s review of any associated invoice will be put on hold. For those experiencing updating problems, USAC suggests contacting the SAM.gov Help Desk at 866-606-8220 for assistance.

## Updates and Reminders

### *Upcoming Dates:*

- October 6      Reply comments are due on the FCC’s proposed Eligible Services List for FY 2023 ([DA 22-878](#)). For a summary of initial ESL comments, see our [newsletter of September 26<sup>th</sup>](#).

October 18	Beginning of USAC’s fall virtual E-rate training program (see <a href="#">registration information on USAC’s Webinars</a> page).												
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October 24	Nominations due for six USAC Board of Directors positions (see <a href="#">DA 22-877</a> ).												
October 25	EPC administrative window opens to permit E-rate entity updates.												
October 28	Invoice deadline for FY 2021 recurring service FRNs and/or the deadline for requesting a one-time 120-day extension to February 27, 2023.												
October 31	The first Form 486 deadline for FY 2022 Waves 1-11, committed before July 1, 2022.												

*FCC Streamlined Decisions:*

The FCC issued another set of “streamlined” precedent-based decisions ([DA 22-1008](#)) last week. As with past streamlined decisions, applicants facing similar problems as those addressed in these decisions may garner useful information by carefully reading the additional FCC explanations found in the footnotes. The original appeal and waiver requests can be found online in the FCC’s [Search for Filings](#) under Docket 02-6 (E-rate) or Docket 21-93 (ECF).

In September’s streamlined decisions, the FCC:

1. E-Rate Dismissed:
  - a. One request submitted with insufficient information.
  - b. Three Requests for Waiver dismissed as moot as the issues had been resolved or invoices had been fully funded.
  - c. One untimely Petition for Reconsideration.
2. E-Rate Granted:
  - a. One Request for Review and/or Waiver involving a rejected bid “only after determining that the service provider could not offer the requested service.”
  - b. One Petition for Reconsideration for a ministerial and/or clerical error.
  - c. One Petition for Reconsideration for an untimely appeal waiver filed “within a reasonable period of time after receiving actual notice of USAC’s adverse decision.”
  - d. Seven Requests for Waiver for late filed Form 471 applications filed within 14 days of the deadline.
  - e. Three Requests for Waiver for late filed Form 471 applications filed within 30 days of the deadline.
  - f. One Request for Waiver for a late-filed Form 471 application “due to circumstances beyond their control.”

- g. Four Requests for Review and/or Waiver for ministerial and/or clerical errors.
  - h. Two Requests for Waiver “allowing extensions of the deadline for service implementation when applicants demonstrated they were unable to complete implementation on time for reasons beyond the service providers’ control and made significant efforts to secure the necessary extensions.”
  - i. Eight Requests for Waiver of the appeal filing deadline filed “within a reasonable period of time after receiving notice of USAC’s adverse decision.”
  - j. One Request for Waiver of the special construction service delivery deadline.
3. E-Rate Denied:
- a. Five Requests for Waiver for invoice deadline extensions.
  - b. Twenty-seven Requests for Waiver for late-filed Form 471s presenting no special circumstance justifying a waiver of FCC rules.
  - c. Ten Requests for Waiver for untimely appeals or waiver requests.
4. ECF Denied:
- a. Two Requests for Waiver to extend voluntarily reduced ECF funding requests.

### USAC ECF Newsletter Dated September 29 — Multiple Topics

USAC’s Emergency Connectivity Fund Program Newsletter of September 29, 2022, covers the following topics:

- An introduction to the new and optional Service Invoice Summary form discussed more fully above in the USAC ECF Webinar Pointers article.
- A link to the FCC’s new [downloadable list](#) showing the total number of ECF-funded connections and connected devices by state. As of the last funding wave, it shows:

State	Connection Count (Waves 1-22)	Connected Device Count (Waves 1-22)
North Carolina	109,712	391,166
National Total	7,117,336	11,549,103

- A summary of the very few FCC waivers granted for late-filed ECF applications on the basis of “special circumstances” (see our [newsletter of September 26<sup>th</sup>](#)).
- A summary of the FCC waiver of program rules for Puerto Rico due to Hurricane Fiona (see our [newsletter of September 26<sup>th</sup>](#)). We note that a similar waiver may be required as a result, at least for Florida, due to Hurricane Ian.
- Reimbursement reminders and tips for ECF reimbursement requests also discussed more fully above in the USAC ECF Webinar Pointers article.

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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 USAC, the 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.*

*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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