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Funding Status

E-Rate for FY 2024:

Wave 18 for FY 2024 was released on Thursday, August 22nd, for \$54.3 million including \$475 thousand for three North Carolina applicants. Total funding, which crossed the two billion dollar mark last week, is now \$2.05 billion including \$57.8 million for North Carolina. Currently, USAC has funded 91.6% of the originally submitted applications, representing 68.3% of the dollars requested.

Form 484 Part 1 Overview

USAC conducted a webinar last week to preview the first form — FCC Form 484 Part 1 — to be used by schools and libraries seeking to participate in the Cybersecurity Pilot Program. As we had previously discussed in our <u>newsletter of August 12th</u>, Part 1 of the Form 484 will be used to review prospective participants in the Pilot. From that review, the FCC will select what we expect to be a much smaller number of applicants to participate in the program itself by filing the next three forms: Form 484 Part 2, and Pilot versions of the Form 470 and Form 471.

For those schools and libraries who might have thought that Form 484 Part 1 would be used to simply express their interest in the cyber Pilot, last week's webinar was a revelation. The successful completion of the Form 484 Part 1 will require a thorough understanding of cybersecurity and a well-thought-out plan for participation in the Pilot.

We strongly recommend that any potential Pilot participant watch — or even re-watch — last week's webinar (see online <u>recording</u> and <u>slides</u>). A summary of the key points is provided below.

• Access to the Pilot Program and its forms will be via a new section in EPC, much like the sections currently in EPC for E-rate and ECF. The Pilot section will become available today (see USAC Newsletter discussed below). The Form 484 Part 1 will not be available until the FCC announces the opening of the Form 484 Part 1 window this "fall." Basic information for existing E-rate applicants will be pre-populated into the Pilot section.

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- Consultants will see the Pilot section in their EPC accounts but will not have access into their clients' Pilot accounts unless proactively granted access by those clients.
- Once into the Pilot section, a user can start a Form 484 Part 1 by clicking the "waffle" in the upper righthand corner of the home screen (see red arrow).



- The Form 484 Part 1 itself will require:
 - O A project summary limited to 5,000 characters; longer summaries can be uploaded as an attachment.
 - o Identification of services and equipment proposed to be purchased.
 - O Description of how Pilot funding will be used to protect the network, again limited to 5,000 characters and/or an upload.
 - List of cybersecurity risks to be addressed.
 - o Selection of primary area of focus.
 - o Selection (from a list) of goals and objectives.
 - Yes/no questions focusing on best practices of national cybersecurity recommendations by CISA (Cybersecurity and Infrastructure Security Agency), NIST (National Institute of Standards and Technology), and the U.S. Department of Education.
 - o Yes/no questions on cybersecurity expertise and other sources of funding.
 - o Yes/no questions on cybersecurity incidents and implementation of best practices.
 - Yes/no questions on staffing and use of other free or low-cost cybersecurity resources.
 - Estimated costs and access to funding to cover non-discounted costs.¹
 - o Yes/no questions on metrics to evaluate Pilot Program outcomes.
- Based on a review of the Form 484 Part 1 submissions, the FCC will select a subset of applicants to move forward in the actual Pilot. Unstated in the webinar, but implicit in the information requested in the Form 484 Part 1, is that selection to continue further in the Pilot will depend critically on an applicant's answers to the requirements listed above.
- As a separate objective for selection, the FCC indicated that it would seek to include "a diverse set of Pilot Program projects and to target Pilot Program funds to the populations most in need of cybersecurity support, the FCC will award support to a combination of large and small and urban and rural schools, libraries, and consortia, with an emphasis on funding proposed Pilot projects that include low-income and Tribal applicants." Diversity aside, it appears that only higher discount rate applicants are likely to be chosen.

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¹ See recently updated FCC <u>FAQs</u>, specifically "2.5 Q: How should I estimate the cost of eligible services and equipment of my Pilot project on the FCC Form 484?"

One other point that was clarified during the Q&A sections of the webinar dealt with consortium applications. As applicant information is carried over from the E-rate portion of EPC into the Pilot portion, all members of an E-rate consortium will be included with that consortium. If a E-rate consortium plans to file a Pilot application, not all the consortium members need to be included. However, the Form 484 Part 1 must clarify which members are to be included and which members are not. Alternatively, the participating members may create a new consortium and apply for a new consortium BEN. Members of a Pilot consortium cannot also apply as individual Pilot applicants.

Updates and Reminders

Upcoming Dates:

August 27	USAC webinar with an overview of the Open Data system (<u>registration</u>).
August 29	USAC Open Data, Course 2, training webinar on creating reports and visualizations (registration).

August 29 Invoice deadline for ECF Window 3 applications.²

August 30 Due date for public comments on the FCC's proposed Eligible Services List ("ESL") for FY 2025 (<u>DA 24-743</u>). Reply comments are due September 16th.

September 9 Form 486 deadline for FY 2023 Wave 54. More generally, the Form 486 deadline is 120 days from the FCDL date, or the service start date (typically July 1st), whichever is later. Upcoming Form 486 deadlines are:

Wave 55 09/23/2024 Wave 56 10/17/2024 Wave 57 10/28/2024

The first Form 486 deadline for FY 2024, for applicants funded on or before July 1st, will be October 29th.

September 10 Pilot Program Form 484 Part 1 Overview and FAQs (<u>registration</u>).

October 15 Cybersecurity Pilot Program Overview for Service Providers (<u>registration</u>).

USAC Cybersecurity Pilot Program Newsletter Dated August 22 – User Permissions

USAC's Cybersecurity Pilot Program Newsletter dated August 22, 2024, indicates that a new Cybersecurity Pilot Program portal is now available in EPC. Although the Pilot application window is not yet open, prospective applicants can begin making administrative updates to applicant and contact information that has been carried over from E-rate. Most immediately, for applicants that plan to apply for the Cybersecurity Pilot Program, the Account Administrator can set permission levels — Full-Rights, Partial-Rights, and View-Only Rights — for existing or new staff.

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² The government funding bill passed in March 2024 rescinds \$1.768 billion from the ECF program. As a result, the FCC and USAC are now prevented from processing post-commitment requests to change service providers or invoicing methods, approving a commitment if an appeal or waiver is granted, or making upward commitment adjustments to resolve errors (see <u>USAC's ECF Newsletter for June)</u>.

Permissions for any consulting personnel used by an applicant, already established for E-rate purposes, have <u>not</u> automatically been carried over into Pilot accounts. If desired for Pilot purposes, consultant permissions must be set anew by the Account Administrator. Only <u>three</u> such consultants may be associated with a given Pilot account.

The Pilot newsletter highlights the two following training sessions:

September 10 Pilot Program Form 484 Part 1 Overview and FAQs (<u>registration</u>).

October 15 Cybersecurity Pilot Program Overview for Service Providers (registration).

The newsletter also includes links to other Pilot resources, most importantly to FAQs that are periodically updated by <u>USAC</u> and the <u>FCC</u>. Hint: When using the FCC's FAQs, the easiest way to find the latest updates is to download the <u>Full List</u> in PDF format, then use the Find tool to search for the new FAQs marked with asterisks.

For those who did not receive last Friday's Cybersecurity Pilot Program newsletter, we suggest signing up for future updates.

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. Please include your name, organization, telephone, and e-mail address.

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