Weekly E-Rate Newsletter
Vol. 18, No. 39 September 26, 2024

- Funding Status
 - E-Rate for FY 2024
- Cybersecurity Form 484 Part 1 Application Window Is Open
- E-Rate Form 470 for FY 2025 Is Now Available
- Updates and Reminders
 - Upcoming Dates
 - FY 2025 Eligible Services List Reply Comment
 - FCC Streamlined ECF Decisions
- USAC Cybersecurity Pilot Program Newsletter Dated September 16 Multiple Topics

Funding Status

E-Rate for FY 2024:

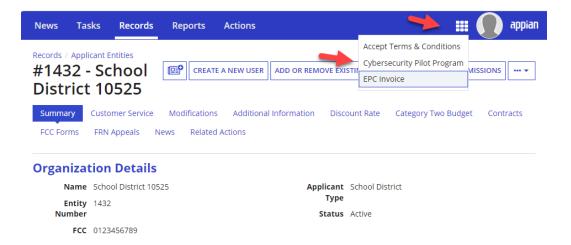
Wave 22 for FY 2024 was released on Thursday, September 19th, for \$30.0 million, none for North Carolina. Total funding is now \$2.23 billion including \$65.7 million for North Carolina. Currently, USAC has funded 93.7% of the originally submitted applications, representing 74.7% of the dollars requested.

Cybersecurity Form 484 Part 1 Application Window Is Open

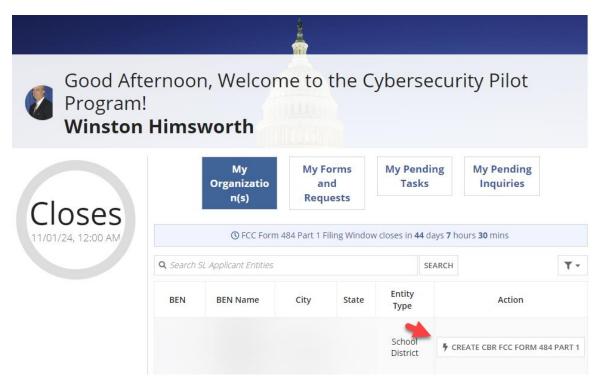
The Form 484 Part 1 window for the FCC's Cybersecurity Pilot Program opened last Tuesday, September 17th. As discussed in our <u>newsletter of August 26</u>, the Form 484 Part 1 will serve as an initial screening mechanism for participation in the Pilot. We expect only a subset of the applicants submitting this first form to be selected by the FCC to participate in the Pilot itself. Those selected will then be able to file the remaining forms: (a) the Form 470 to initiate competitive bidding for Pilot equipment and services; (b) the Form 484 Part 2 to provide more detailed information on their Pilot plans; and (c), the Form 471 to apply for actual Pilot funding.

To access and file the Form 484 Part 1 ("Form 484-1"), applicants must log into the EPC portal. From the applicant's main page, click on the "waffle" in the upper righthand corner and select "Cybersecurity Pilot Program."

© 2024 E-Rate Central Page 1 of 9

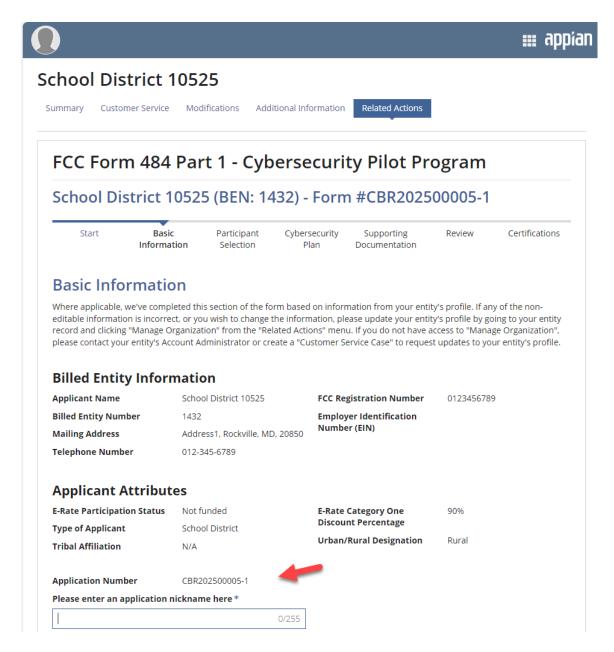


This will bring up the welcome page for the new "CBR" portion of the EPC portal from which an applicant can initiate the Form 484-1 filing.



The first part of the Form 484-1 begins with the "Basic Information" section. This section will have been already completed with information carried over from E-rate. A CBR form number will have already been assigned to the Form 484-1.

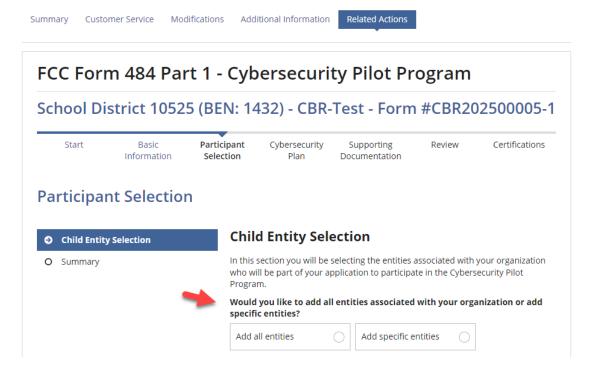
© 2024 E-Rate Central Page 2 of 9



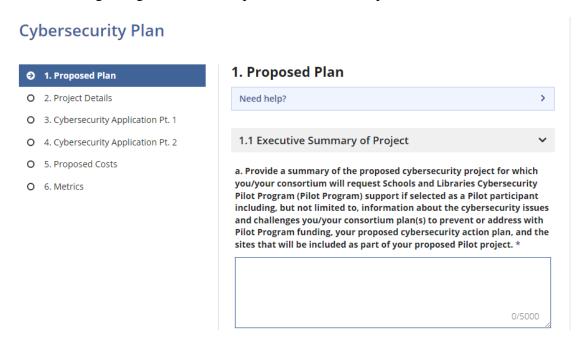
The first step in the Form 484-1 process is to complete the "Participant Selection" selection. This is different from the E-rate process in that a given billed entity — a school district or library system for example — may apply for all, or just a subset, of its members. The choice at this stage, therefore, is to "Add all entities" or just "Add specific entities." This option may be particularly relevant for consortia who may be applying on behalf of only some of its members. In such a case, participating consortium members must remember that they cannot also apply separately for participation in the Pilot.

© 2024 E-Rate Central Page 3 of 9

School District 10525



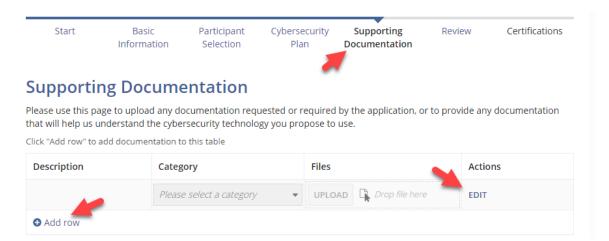
The remainder of the Form 484-1 deals with the proposed "Cybersecurity Plan" and is broken into six subsections beginning with series of questions on the "Proposed Plan."



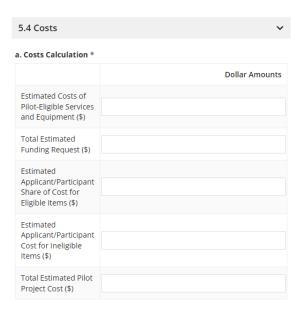
Many of the Plan fields involve simple checkoff boxes or pulldowns. Others, such as the "Executive Summary" shown above, require more extensive responses. In the latter cases, text can be entered directly into the form (limited to 5,000 characters) and/or uploaded as a separate file.

© 2024 E-Rate Central Page 4 of 9

To upload information, either to add to a text field or to provide other information, click on: (1) "Supporting Documentation;" (2) "Add Row;" and (3), "EDIT" to add a "Description," pick a "Category" (email, file, or image), drag in the upload file.



Completing the Form 484-1 requires a great deal of information, some of which you may want to cross-reference with other fields. One of the more important fields that may require more discussion elsewhere is 5.4.a. on costs, as shown below.



Our suggestion is to look through the entire form first rather than attempting to work through it sequentially as it is presented in EPC. A Blank Form 484 Part 1 has been posted on our website.

E-Rate Form 470 for FY 2025 Is Now Available

The long delayed E-rate Form 470 for FY 2025 became available Thursday, September 19th. Prior to this time, applicants seeking new services for FY 2025 could have used the older FY 2024 version to initiate bidding for traditional services; the new FY 2025 includes dropdowns for newer services and supports an important new feature.

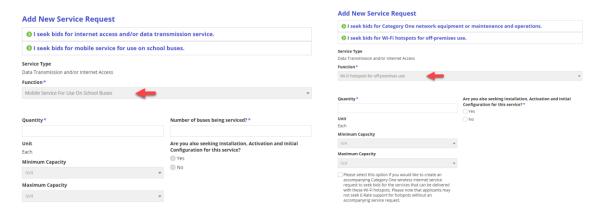
© 2024 E-Rate Central Page 5 of 9

Requests for Category 1 services in the FY 2025 Form 470, as shown below, now include checkoffs for both Wi-Fi on school buses and Wi-Fi hotspots. Wi-Fi on school buses became eligible in FY 2024 but was not listed as an explicit option in last year's Form 470. Hotspots, newly eligible in FY 2025, are now also listed.

Add New Service Request

I seek bids for internet access and/or data transmission service.	
I seek bids for Internet access and data transmission service (provided over any combination of transmission medium, e.g., fiber-only networks, fiber/non-fiber hybrid networks, or non-fiber networks such as cable, DSL, copper, satellite, microwave or wireless).	
I seek bids for internet access without data transmission service and will arrange for separate data transmission service if required.	
I seek bids to purchase data transmission service only (i.e., that does not include internet access service).	
I seek to build my own network.	
I seek bids for mobile service for use on school buses.	
I seek bids for wireless Internet services that can be delivered with a Wi-Fi hotspot for off-premises use.	

To request either service, simply check the appropriate service above, then complete the detailed information below as to quantity and bandwidth.



The other important change in the FY 2025 Form 470 is the ability to add an RFP document to an existing Form 470. This ability was allowed in the past, but <u>only</u> if at least one document had been appended to the Form 470 when it was first created. Now, as a "Related Action," you can:

Add an RFP Document

This function allows you to upload and associate an additional RFP to one or more Service Requests even if the RFP document did not exist at the time of certification.

The instructions for adding an RFP (or any additional information, such as Q&A responses) are in the following section. Note that they include a question as to whether the new document constitutes a "substantial" change to information provided in the original Form 470. If "Yes," the system will then add an additional 28 days to the Allowable Contract Date. Because neither USAC nor the FCC has ever adequately defined "substantial," it is usually safest to check "Yes," accept the additional 28-day wait, and avoid future arguments with PIA.

© 2024 E-Rate Central Page 6 of 9

Add an RFP to FCC Form 470

School District 10525 - Test - Form #250000044 - Funding Year 2025

Upload RFP

Changes to the FCC Form 470, including uploading a new RFP document, may require applicants to restart the 28-day waiting period before selecting a service provider, signing a contract, or submitting and certifying an FCC Form 471. Ministerial or clerical errors, such as updating contact information, do not require a reset of the 28-day waiting period. However, changes that materially affect the competitive bidding process, such as changing the services or equipment being requested, do require restarting the 28-day

If you are requesting bids for additional equipment, services, or recipients of service not included on the original FCC Form 470, you may need to file a new FCC Form 470.

Please review the USAC.org for additional guidance.	
Does this new RFP constitute a substantial change to your FCC Form 470? *	
○ Yes	
○No	
If you select yes, the 28-day waiting period will reset, and the Allowable Contract Date on your FCC Form 470 will be updated accordingly. If the new Allowable Contract Date prevents you from certifying the FCC Form 471 before the application window closes, you must request a waiver from the Commission after certifying the FCC Form 471.	
Uploading a new RFP document with substantial changes and not waiting the minimum 28 days may result in denial of funding.	
Please add an RFP here 🕡*	
UPLOAD Drop file here	

Updates and Reminders

Upcoming Dates:

September 23	Form 486 deadline for FY 2023 Wave 55. More generally, the Form 486
	deadline is 120 days from the FCDL date, or the service start date (typically
	July 1 st), whichever is later. Upcoming Form 486 deadlines for FY 2023 are:

Wave 56 10/17/2024 Wave 57 10/28/2024

September 30 Last day to receive service or to submit a Service Delivery Deadline request for FY 2023 non-recurring services.

USAC webinar: Cybersecurity Pilot Program Overview for Service Providers

October 15 (registration).

October 28 Due date for nominations for eight positions on the USAC Board of Directors (see DA 24-867).

E-rate invoice deadline for FY 2023 recurring services and final date to October 28 request an invoice deadline extension.

October 29 Form 486 deadline for FY 2024 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. Upcoming Form 486 deadlines for FY 2024 are:

> Wave 11 10/31/2024 11/08/2024 Wave 12

© 2024 E-Rate Central Page 7 of 9

November 1 Planned close of the Form 484 Part 1 application window.

FY 2025 Eligible Services List Reply Comment:

With everything else going on in E-rate and related programs this year, few parties decided to comment on the FCC's proposed Eligible Services List ("ESL") for FY 2025 (<u>DA 24-743</u>). As noted in our <u>newsletter of September 2nd</u>, only a few parties filed initial comments last month. In our view, the most important comments had been filed by the <u>State E-Rate Coordinators' Alliance</u> ("SECA") arguing for the eligibility of advanced firewalls for FY 2025 to complement the FCC's new, but limited, Cybersecurity Pilot Program.

Reply comments filed last week, only by <u>E-Rate Central</u>, strongly supported SECA's position stressing the point that the proposed ESL for FY 2025, as it has in recent years, limited "basic firewall" service only to Category 1 while effectively indicating that "firewalls," without being further defined, were eligible as Category 2. The reply comments argued that making more advanced firewalls eligible under Category 2, for which funding is capped, could benefit all E-rate applicants while preserving limited Pilot funding for other cybersecurity products and services.

FCC Streamlined ECF Decisions:

Last week, the FCC issued a small set of midmonth "streamlined," precedent-based appeals and waivers dealing only with ECF applications. 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/or waiver requests can be found online in the FCC's <u>Search for Filings</u> under Docket 21-93.

In these streamlined decisions (<u>DA 24-961</u>), the FCC granted:

- One Request for Waiver for ministerial and clerical errors on ECF invoicing remanding the issue back to USAC for further review.
- Six Requests for Waiver to extend the ECF invoice deadlines for the first and second application windows because the applicant or service provider was unable to timely file due to personnel changes or administrative issues.

USAC Cybersecurity Pilot Program Newsletter Dated September 16 – Multiple Topics

<u>USAC's Cybersecurity Pilot Program Newsletter dated September 16, 2024</u>, highlighted the opening of the Form 484 Part 1 application window on September 17th. As resources for filers, the newsletter points to the <u>FCC Form 484 Part 1 User Guide</u> and a series of USAC's past and future webinars.

The most interesting aspect of last week's newsletter was a brief note indicating that as the result of several late-filed corrections to the FCC's Cyber Pilot order, certification of the Form 484 Part 1 applications will await an FCC notice of the effective date of those corrections. In the meantime — and despite the announced close of the application window on November 1st — applicants can complete their Form 484 Part 1s but cannot yet certify them.

© 2024 E-Rate Central Page 8 of 9

Last week's newsletter also discusses:

- The management of Pilot program user permissions in EPC.
- A reminder that applicants on Red Light status as of September 17th are not eligible for the Pilot program.
- Upcoming USAC webinars and online "office hours."
- Pilot program resources including the Department of Homeland Security's <u>Cybersecurity</u>
 <u>& Infrastructure Security Agency</u> website and the Department of Education <u>Cybersecurity Preparedness</u> website.

Another important link in the newsletter is to the FCC's Cybersecurity webpage that, in turn, includes a link to the FCC's FAQs. The FAQs are particularly important to understanding the Pilot because they are continually being updated as the FCC clarifies various aspects of the program. When viewing the FAQs, it is best to review them all by clicking the "Expand All" link or downloading the Full List of FAQs in PDF format. The most recent updates to the FCC's FAQ list are marked with an asterisk.

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.

In compliance with federal law, the NC Department of Public Instruction administers all state-operated educational programs, employment activities and admissions without discrimination because of race, religion, national or ethnic origin, color, age, military service, disability, or gender, except where exemption is appropriate and allowed by law.

© 2024 E-Rate Central Page 9 of 9