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Funding Status

E-Rate for FY 2025:

The Form 471 filing window for FY 2025 closed on March 26th. Preliminary demand, as summarized in USAC’s annual [letter](#) to the FCC was \$3.2 billion. This is well below the year’s \$5.06 billion funding cap set earlier this month by the FCC. This demand total will increase over the next month or two as the FCC grants waivers on late-filed applications certified within two weeks of the window closing, then decrease as pending requests are reduced during the PIA review process. We would expect the first wave of FY 2025 funding commitments to be issued by USAC by the end of this month.

E-Rate for FY 2024:

Wave 51 for FY 2024 was released on Thursday, April 10th, for \$3.38 million, none for North Carolina. Total funding is now \$2.65 billion including \$73.6 million for North Carolina. Currently, USAC has funded 98.3% of the originally submitted applications, representing 91.8% of the dollars requested.

Cybersecurity Pilot Program – Application Window:

The Form 471 application window for the Cybersecurity Pilot Program opened on March 18th and will close on September 15th, 2025. Total pilot funding is capped at \$200 million for 707 applicants. Initial commitments include \$10.1 million for seventeen North Carolina applicants.

Updates and Reminders

Upcoming Dates:

April 18	FY 2024 Form 486 deadline for Wave 35. The Form 486 deadline is 120 days after the FCDL date, or the service start date (typically July 1 st), whichever is later. The next Form 486 deadlines for FY 2024 are:
	Wave 36 04/25/2025
	Wave 37 05/02/2025
	Wave 38 05/09/2025

April 28	Reply comments due on the FCC's "Delete, Delete, Delete" initiative.
May 28	Extended invoice deadline for FY 2023 non-recurring service FRNs with approved extensions beyond the original January 28, 2025, deadline.
June 30	Last day to light fiber (or request an extension for) FY 2024 special construction projects.
June 30	Last day to receive (or file service substitutions for) FY 2024 recurring services.
July 1	Withdrawal deadline for Cybersecurity Pilot participants opting not to continue in the Program.
September 15	Close of the Cybersecurity Pilot Form 471 application window and deadline for filing the Form 484 Part 2.

Delete, Delete, Delete E-Rate Comments:

Last Friday was the deadline for submitting comments in the FCC's proceeding entitled "Delete, Delete, Delete" ([DA 25-219](#)) designed to eliminate unnecessary FCC rules and regulations (see our [newsletter of March 17th](#)). The Delete³ initiative was FCC-wide, not specifically targeted to E-Rate. Indeed, the consensus of many in the E-Rate community is that substantive rule changes as a result of this proceeding are unlikely. The few E-Rate comments that were filed, such as those by [ALA](#), [CENIC](#), and SHLB, reiterated suggestions that have been made in the past. SHLB's filing, for example, made the following points:

- Delete FCC Form 486
- Eliminate the "extraordinary circumstance" invoice deadline waiver standard
- Delete USAC post-audit "policies and procedures" requirement
- Eliminate program procedures that hinder transitioning between service providers
- Eliminate program procedures that disallow mid-year bandwidth increases
- Eliminate Form 470 drop-down menu categories confusion
- Delete statement that Demand Payment Letters cannot be appealed

One inventive exception to this approach was filed by On-Tech Consulting that filed an extensive set of comments that, were they to be implemented, would significantly change the entire E-Rate process. While the likelihood of any of these changes being implemented in the near future are nil, the [On-Tech filing](#) provides an interesting perspective as summarized in the following listing of the filing's contents:

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Abolish the Form 470	3
Don't Require a Contract	4
Changes to the Filing Process	5
Eliminate the Filing Window.....	5
Eliminate the Funding Year	5
Simplify the PIA Process	6
Reduce the Secrecy	6
Simplify PIA for Small Requests.....	7
Allow Duplicative Services	7
Eliminate Locations	7
Make Firewalls Eligible.....	8
Simplify the Forms	8
Form 470	8
Form 471	8
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The deadline for submitting reply comments in the Delete³ proceeding is April 28th.

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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