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Funding Status

E-Rate for FY 2025

Wave 16 of funding commitment decision letters for FY 2025 was released on Thursday, August 7th, for \$74.4 million, including \$1.33 million for nine North Carolina applicants. Total funding is now \$1.71 billion, including \$39.4 million for North Carolina. Currently, USAC has funded 82.7% of submitted applications, representing 53.6% of the dollars requested.

As of Wave 16, no FRNs have been funded for either hotspots or school bus Wi-Fi. Excluding cancellations, there are currently 898 FRNs pending for hotspots and 532 FRNs pending for school bus Wi-Fi, totaling \$50.1 million and \$15.3 million, respectively.

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 690 applicants, including 7.9 million for fifteen North Carolina applicants.

Updates and Reminders

Upcoming Dates:

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|-------------|--|---------|------------|
| August 15 | FY 2024 Form 486 deadline for Wave 52. 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:
<div style="margin-left: 100px;"> <table border="0"> <tr> <td style="padding-right: 40px;">Wave 53</td> <td>08/22/2025</td> </tr> </table> </div> | Wave 53 | 08/22/2025 |
| Wave 53 | 08/22/2025 | | |
| August 18 | Last day to certify a CBR Form 470 to meet the minimum 28-day posting period before filing the CBR Form 471. | | |
| September 5 | Final day of the PIA summer deferral period (which began May 23 rd). | | |

- September 9 USAC in-person training in Denver, CO ([register](#)).
- September 15 Close of the Cybersecurity Pilot Form 471 application window and deadline for filing the Form 484 Part 2.
- September 15 Due date for comments to the Congressional USF Working Group (see our [newsletter of August 4th](#)).
- September 16 USAC in-person training in Washington, DC ([register](#)) (also available online).
- October 29 First Form 486 deadline for FY 2025 for applicants funded in Waves 1-10. The Wave 11 deadline will be October 31 with subsequent Form 486 waved deadlines following weekly.
- October 29-31 [AnchorNets](#): 13th Annual SHLB Conference, Crystal City, VA. E-Rate Central is a Gold-level sponsor of the event.

FCC Asked to Fully Fund All Cybersecurity Pilot Program Applicants:

E-Rate Central, in its role as New York State E-Rate Coordinator, recently [encouraged](#) the FCC to take steps to provide full funding for the twenty-five Cybersecurity Pilot Program participants who were originally, and remain, funded at the 78% level.

In its January 16, 2025, Public Notice ([DA 25-53](#)), announcing the selected program participants, the FCC stated that “In the event of any withdrawals or removals from the Pilot Program, the Bureau will first seek to fully fund” the partially funded applicants. By our count, seventeen participants have since withdrawn from the program. In acknowledging those withdrawals, the FCC has indicated to each that “your pre-discount, three-year budget will be allocated to another participant.”

With the CBR Form 471 filing deadline only five weeks away, E-Rate Central believes it would be both timely and beneficial for the FCC to notify the partially funded applicants that they will now be fully funded. The funding appears readily available: the combined budgets of the seventeen withdrawn participants total \$8,029,562.40, while the amount needed to bring all partially funded applicants to 100% is \$3,826,574.40 — less than half the available amount.

We urge the FCC to move forward with this funding adjustment. The FCC might also consider a modest extension of the CBR Form 471 filing deadline for this group of Cyber Pilot applicants in light of the additional funding.

FCC Streamlined Decisions:

The FCC issued another set of “streamlined,” precedent-based appeals and waivers on August 1st. As with past streamlined decisions, applicants facing similar problems to 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 [Search for Filings](#) under Docket 02-6 (E-Rate) or Docket 21-93 (ECF).

In July’s streamlined decisions ([DA 25-648](#)), the FCC:

1. E-Rate Dismissed:
 - a. Four Requests for Waiver dismissed as moot where USAC had already approved the underlying funding requests.
 - b. Three Requests for Waiver of late-filed Form 471 applications deemed to have been filed on time.
 - c. One Request for Waiver to file an invoice for a fully paid FRN.
 - d. Six Petitions for Reconsideration failing to identify any reasons warranting reconsideration.
 - e. One Petition for Reconsideration filed after the 30-day deadline.
2. E-Rate Granted:
 - a. One Request for Waiver and/or Review involving a CIPA policy adopted without a public hearing. The FCC found that: “Although the applicant did not hold a public hearing, we find that this omission is correctable.” Note the denial below (4.a) for a filtering violation that is not “correctable.”
 - b. One Request for Waiver reversing a USAC decision that a contract was not in place “solely because the execution date of the contract did not accompany the signature lines of both the applicant and the service provider.”
 - c. One Request for Waiver demonstrating extraordinary circumstances — service provider accounting issues beyond the applicant’s control — warranting an invoice deadline extension.
 - d. One Request for Review, remanded to USAC, where the FCC disagreed with USAC’s discount calculation determination.
 - e. One Request for Review where the FCC found that USAC “erred in its eligibility determination regarding the petitioner’s requested services.”
 - f. One Request for Waiver where the FCC found that the applicant had complied with the FCC’s competitive bidding rules.
 - g. One Request for Waiver where the service provider was unable to timely file its SPAC due to technical issues.
 - h. One Petition for Reconsideration, due to extraordinary circumstances, involving a 15-month delay in reactivating a SAM.gov registration, warranting an invoice filing deadline extension.
 - i. One Request for Waiver for a late-filed appeal/waiver filed only a “few days” late.
 - j. One Request for Waiver for a late-filed Form 471 due to circumstances beyond the applicant’s control.
 - k. One Request for Waiver for a late-filed Form 471 filed within a reasonable period despite a school reorganization.
 - l. Two Requests for Waiver and one Petition for Reconsideration for late-filed Form 471s due to unexpected illnesses or a serious medical condition.
 - m. Eleven Requests for Waiver for late Form 471s filed within 14 days of the close of the window.
 - n. Five Requests for Waiver for ministerial and/or clerical errors.
 - o. One Request for Waiver for an unintentional cancellation of a funding request.

- p. One Request for Waiver on an invoice deadline extension request based on a USAC decision issued after the invoice filing deadline.
 - q. One Request for Waiver of the document retention rule finding that the “violation” was really a clerical error.
 - r. Five Requests for Waiver of the special construction service delivery deadline.
3. E-Rate Granted in Part:
- a. One Request for Waiver for late-filed Form 471s, involving 23 schools and 32 applications, for applications filed within 14 days of the deadline.
4. E-Rate Denied:
- a. One Request for Review for failure to comply with the CIPA filtering requirement. The school had argued that filtering was not required because the location of the service was administrative only. The FCC noted that “computers not available to the public are not exempt from the CIPA requirements.”
 - b. One Request for Review involving a Form 470 and RFP with “Inadequate Specificity.”
 - c. One Request for Waiver for ineligible services.
 - d. Thirty-one Requests for Waiver for late-filed Form 471 applications.
 - e. Six Requests for Waiver for late-filed invoice deadline extension requests.
 - f. One Request for Review and/or Waiver for a Form 470 that did not seek bids on types of services later requested.
 - g. Five Requests for Waiver for untimely filed appeals or waiver requests.
5. ECF Dismissed:
- a. Two Requests for Waiver in cases in which the applicants were fully funded and compensated.
6. ECF Granted:
- a. Two Requests for Waiver for the early delivery of services.
 - b. Three Requests for Review or Waiver granting additional time to respond to USAC requests for information.
 - c. One Request for Waiver for ministerial and/or clerical errors.
 - d. One Request for Waiver of the ECF invoice filing deadline.

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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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