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Funding Status

E-Rate for FY 2025

Wave 17 of Funding Commitment Decision Letters for FY 2025 was released on Thursday, August 14th, for \$61.6 million, including \$2.06 million for thirteen North Carolina applicants. Total funding is now \$1.78 billion, including \$41.5 million for North Carolina. Currently, USAC has funded 84.1% of submitted applications, representing 55.6% 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 690 applicants, including \$7.9 million for fifteen North Carolina applicants.

As noted below, today, August 18th, is the CBR Form 470 deadline.

Updates and Reminders

Upcoming Dates:

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| August 18 | Last day to certify a CBR Form 470 to meet the minimum 28-day posting period before filing the CBR Form 471. |
| August 22 | FY 2024 Form 486 deadline for Wave 53. Please note that, as of this Wave, we will no longer be tracking FY 2024 Form 486 deadlines on a Wave-by-Wave basis. |
| 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 Wave deadlines following weekly. Specifically, the Form 486 deadline is 120 days after the FCDL date, or the service start date (typically July 1st), whichever is later.
- October 29-31 [AnchorNets](#): 13th Annual SHLB Conference, Crystal City, VA. E-Rate Central is a Gold-level sponsor of the event.

USAC Cybersecurity Pilot Program Newsletter Dated August 13th — Interpreted

[USAC's Schools and Libraries Cybersecurity Pilot Program Newsletter dated August 13, 2025](#), covers the following topics:

- Key deadlines:
 - August 18th Last day to file a CBR Form 470 to allow the minimum 28-day posting period before the close of the application window.
 - September 15th Deadline for filing the CBR Form 471 application and the companion CBR Form 484 Part 2.
- Reminder about filing an appeal/waiver request.
- CBR Form 471 application review.
- Funding Commitment Decision Letter (“FCDL”)
- Starting services
- Invoicing

We note that the section on “Starting Services” is so brief as to be potentially misleading. It reads:

Following review of the Pilot FCC Form(s) 471 and the submission of the Pilot FCC Form 484 Part 2, USAC will issue a Funding Commitment Decision Letter (FCDL) to both the participant and the selected service provider(s) approving, modifying, or denying each funding request submitted. The FCDL will provide the amount of committed funding available for each request based on the Pilot participant’s pre-discount three-year budget, will cover the three-year term of the Pilot Program, and will include a reminder to participants that funding is contingent upon full compliance with the FCC rules.

The link to the [Starting Services](#) webpage is somewhat more expansive but, in our view, still not complete. It reads:

Pilot funds will be available as soon as a Pilot participant receives a Funding Commitment Decision Letter (FCDL) from USAC and has successfully completed Part 2 of the Pilot FCC Form 484 application. Pilot participants and service providers will be able to request reimbursement after the receipt or delivery of eligible cybersecurity services and/or equipment through the Pilot Program.

The earliest service delivery start date for the Pilot Program is March 18, 2025, i.e., the first day of the Pilot FCC Form 471 application filing window. The last date to receive service is three years from the date of the first FCDL for each funding request number (FRN). See 47 CFR §§ 54.2001(c) and 54.2008(d).

For month-to-month services, Pilot participants should use their actual service delivery start and end dates on the Pilot FCC Form 471. For contracted services, Pilot participants should use their contract start and end dates for the requested services on the form. For example, if services are contracted to start on October 1, 2025, and continue through September 30, 2028, you would use these dates on the form.

The reason that an understanding of “Starting Services” is so important is that service start dates and service end dates in the Cyber Pilot program are markedly different than in the E-Rate program. In E-Rate, there are fixed service delivery periods per funding year, starting July 1st of each year, and ending June 30th (or September 30th for non-recurring services).

In contrast, service start and end dates in the Cyber Pilot are more complex, vary from applicant to applicant, and, in our view, have yet to be fully explained by either the FCC or USAC. For example, the middle paragraph of the webpage quoted above might lead an applicant to believe that the service period could begin as early as March 18, 2025, and extend through a date that is three years after the applicant’s FCDL date. At this point, with no FCDLs having been issued to date, this would suggest that every applicant’s service period is longer than three years. Since the Pilot is a three-year program, such an interpretation would be clearly wrong.

Here is our current interpretation of the key dates:

1. An applicant’s FCDL date is the first day for which an applicant can start service and be assured that its funding has been approved for the next three years. Recognize that if actual services cannot be started immediately on that first day — perhaps requiring a couple of months to turn up services — the applicant would receive less than thirty-six months of funding. Thirty-six months, to the day, after the receipt of an FCDL is the end of the Cyber Pilot program for that applicant.
2. An applicant’s FCDL date is also important as it sets the deadline for the submission of the annual reviews, due on the first, second, and third anniversary of an applicant’s official participation in the Cyber Pilot.
3. It is unlikely that March 18, 2025, will be the service start date for many Cyber Pilot participants. While starting service before receiving an FCDL is permitted, our assumption is that service cannot actually begin until an applicant has completed its competitive bidding process and awarded a new Pilot contract. Few, if any, applicants had completed that process by March 18th.
4. An applicant seeking to continue an existing cybersecurity service using discounted funding, to be provided by the Cyber Pilot, needs to think through this process carefully. There is really no USAC or FCC guidance on this matter; our following “interpretation” is more of a best guess.
 - a. First and foremost, we assume that the FCC will not insist that only new applicant cybersecurity services are eligible for Pilot funding. One could argue that an applicant will learn nothing new from simply continuing existing cybersecurity services, but there has been no hint that continued services are ineligible.

- b. If this is correct, then the first rule of continued service is that an applicant must pay particular attention to the termination of the non-Pilot contract, the start of the new Cyber contract, and the maximum three-year Pilot funding period.
- c. Assuming that the vendor of an existing service wins the bid for the continuing Pilot service, a seamless contract switch-over should be easily negotiated. If a different vendor wins, then timing is likely to become more difficult.
- d. In either case, a contract switch-over becomes more complex if services are charged on an annual or longer-term basis. Consider the following example. Suppose an annual payment for a service provided under an earlier non-Pilot contract was made for the year beginning July 1, 2025. Presumably, that service, being provided under a non-Pilot contract expiring June 30, 2026, would not be eligible for discounts under a Cyber Pilot contract, until July 1, 2026.

Now follow this carefully.

Suppose the applicant does not receive a Pilot FCDL until December 1, 2025, starting its three-year Pilot participation. However, the original service from July 1, 2025, to June 30, 2026, is being provided entirely under the original non-Pilot contract. No part of that initial July 1, 2025, payment is likely to be reimbursed under the Pilot.

The first year the service becomes eligible under the pilot would be for the next year, billed July 1, 2026. The next year, July 1, 2027, to June 30, 2028, is also eligible. That is two years covered by the Pilot. But what about the third year?

The third year would start with another annual billing on July 1, 2028, covering the period through June 30, 2029. But the third year of the applicant's Pilot program would end November 30, 2028. When a BEAR or SPI invoice is filed for the third year of service, we assume that USAC would only pay an allocated July 1 to November 30th discounted share of the full year service cost.

The entire point of this extended discussion is to suggest that the "Starting Services" guidance provided to date by USAC and the FCC is limited and more information is needed ASAP. Our interpretations, or even guesses, may not be right, but they are important for applicants to consider as they structure the receipt of their Pilot service(s). Our guidance should also serve as a warning that Cyber Pilot service periods and discount reimbursements are more complex, and that more is unknown, than in the E-Rate world with its twenty-seven years of established precedent that we have come to love and hold dear.

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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