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## Funding Status

### *E-Rate for FY 2026 – Application Window:*

**Application Window:** The Form 471 application window for FY 2026 will open midday on Wednesday, January 21<sup>st</sup>, and close on Wednesday, April 1<sup>st</sup>, at 11:59 p.m. EDT. The administrative window, which gave applicants the opportunity to update their EPC entity profiles, closed last Friday, January 16<sup>th</sup>. Any subsequent changes will have to be made during application review.

### *E-Rate for FY 2025:*

USAC issued Wave 37 for FY 2025 on Thursday, January 15<sup>th</sup>, for \$7.75 million, none for Carolina. Nevada. Total funding for FY 2025 as of Wave 37 stands at \$2.52 billion, including \$53.2 million for North Carolina. Currently, USAC has funded 94.8% of submitted applications, representing 85.2% of the dollars requested.

### *Cybersecurity Pilot Program:*

USAC has still not issued a second Cyber Pilot funding wave. After one Cyber wave, issued on December 17<sup>th</sup>, funding for the Cybersecurity Pilot Program stands at \$18.7. million, including \$720 thousand for three North Carolina applicants.

## Cybersecurity Pilot Program Concerns

Applicant frustration with the Cyber Pilot is growing. This is the result of the slow release of funding commitments, unresolved issues with the rules, delays in the release of the CBR Form 488, and a new Open Data file on Cyber funding. Specifically:

- The original Cyber Pilot Order ([FCC 24-63](#)) — see §54.2001(c) — indicated that funding would be available for three years from the date of the first Funding Commitment Decision Letter (“FCDL”). That was initially concerning because if an applicant waited until it was funded, as most have done, before committing to 36-

months of service, the service would be unlikely to begin immediately. This would mean that the applicant could not receive discounts on the full 36 months.

That conundrum seemed to be solved when the FCC released FAQ 1.5a which included an explicit example of a service starting a month after the FCDL date and the “last date to receive service” specified as 36 months from the service start date, rather than from the FCDL date. Unfortunately, a subsequent FAQ 1.8 reiterates the limitation that the last date to receive services is three years from the FCDL date, reintroducing the ambiguity.

As a practical matter, we hope that the FCC gives applicants a reasonable period of time after receiving their FCDLs to initiate services and receive a full three years of service. At the moment, however, the timing discrepancy between FAQ 1.5a and FAQ 1.8 is causing confusion. This issue will shortly become critical for applicants or suppliers seeking to invoice for upfront payment discounts on three years of service.

- Most of the contracts for recurring services, as initially filed in CBR Form 471s during the application window, used what we would call “placeholder dates,” not knowing when funding for such services would be granted. As services are implemented, those contractual service dates will have to be amended to reflect the actual start and end dates.

In its [Cybersecurity Pilot Program Newsletter dated December 2, 2025](#), USAC indicated that a Pilot FCC Form 488 (Post-Commitment Change Request Form) will be available to revise certain application parameters once an applicant has received a Cyber FCDL. Actions supported by the Cyber Form 488 are supposed to include:

- Changing the invoice method.
- Changing service start and/or end dates.
- Cancelling Funding Request Number (FRN) line items.
- Modifying commitment amounts for FRN line items.
- Initiating a site and/or service substitution.

With Cyber FCDLs having been released, at least for Wave 1, post-commitment changes need to be made. Hopefully, the CBR Form 488 will be available soon.

- Within a day of releasing Wave 1, USAC posted an Open Data file for [Cybersecurity Pilot FCC Form 471](#) data. It is an extensive file with many data fields that will have to be completed and updated as additional applicants are funded and services begin. Open Data users, long familiar with the extensive set of E-Rate files, will notice some major changes. There are several key differences to note:
  - Unlike the E-Rate Form 471 Status file, the Cyber Form 471 includes a row for every FRN line item, not just FRN. A significant number of FRNs have multiple line items.
  - Moreover, for committed applications, the original rows remain in place (designated “Certified”) and new rows (designated “Committed”) are added, thus doubling the number of rows associated with each application.

- The table below shows the key columns for a single FRN with four line items, approved as Certified. Rows 2-5 are as certified; Rows 6-9 are as Committed. The confusing point is that the only differences in dollar values for a given line item appear in the “Line Item Total” column. The other dollar value columns are the total of the individual line-item amounts. Were you to add those amounts, whether “Certified” or “Committed”, the total would be four times too large. Calculating the actual requested or Committed amounts for a range of applicants requires eliminating these duplicate line-item totals.

	A	D	E	F	G	H	I
1	Application Status	Pilot FCC Form 471	Total Pre-Discount	FRN Line Item Number	Line Item Total	FRN Requested	FRN Committed
2	Certified	CBR253000937	\$144,742.68	CBR9900001843.001	\$67,212	\$130,268.41	
3	Certified	CBR253000937	\$144,742.68	CBR9900001843.002	\$22,405.68	\$130,268.41	
4	Certified	CBR253000937	\$144,742.68	CBR9900001843.003	\$22,000	\$130,268.41	
5	Certified	CBR253000937	\$144,742.68	CBR9900001843.004	\$33,125	\$130,268.41	
6	Committed	CBR253000937	\$144,742.68	CBR9900001843.001	\$67,212	\$130,268.41	\$130,268.41
7	Committed	CBR253000937	\$144,742.68	CBR9900001843.002	\$22,405.68	\$130,268.41	\$130,268.41
8	Committed	CBR253000937	\$144,742.68	CBR9900001843.003	\$22,000	\$130,268.41	\$130,268.41
9	Committed	CBR253000937	\$144,742.68	CBR9900001843.004	\$33,125	\$130,268.41	\$130,268.41

- One reason that the Cyber Form 471 dataset is so important is that it contains critical service, contracting, and invoicing deadline dates. Unlike E-Rate, for which service start dates, service delivery deadlines, and invoice deadlines fall on the same calendar days each year for almost all applicants, comparable dates for the Cyber program are applicant specific. Almost all critical Cyber dates depend on when an applicant was funded and/or when services start or end. If the database is difficult to use — and/or inaccurate — applicants risk missing key deadlines.

## Updates and Reminders

### Upcoming Dates:

- January 21 The FY 2026 Form 471 application window opens at noon EST. The window will close at 11:59 p.m. EDT on April 1, 2026.  
To meet the minimum 28-day posting requirement and still be able to file a Form 471 by April 1<sup>st</sup>, a Form 470 for FY 2026 must be filed no later than March 4, 2026. Waiting until the last day to file a Form 470 is strongly discouraged.
- January 22 USAC webinar on the E-Rate pre-commitment process ([register](#)).
- January 27 USAC webinar on Cyber Pilot invoicing ([register](#)).
- January 23 FY 2025 Form 486 deadline for applicants funded in Wave 23. More generally, the Form 486 deadline is 120 days after the FCDL date, or the Service Start Date (typically July 1<sup>st</sup>), whichever is later. The next Form 486 deadlines for FY 2025 are:
  - Wave 24 01/28/2026
  - Wave 25 02/06/2026
- January 28 Invoice deadline, and deadline to request an invoice deadline extension, for FY 2024 non-recurring services.

- February 19 USAC webinar with a Q&A session on the E-Rate pre-commitment process ([register](#)).
- February 28 Extended invoice deadline for FY 2024 recurring services for applicants with approved extension requests.

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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.*

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