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## Funding Status

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

Wave 33 of Funding Commitment Decision Letters (“FCDLs”) for FY 2025 was released on Thursday, December 4<sup>th</sup>, for \$44.0 million, for North Carolina. Total funding for FY 2025 is \$2.45 billion, including \$53.2 million for North Carolina. Currently, USAC has funded 93.0% of submitted applications, representing 82.0% of the dollars requested.

### *Cybersecurity Pilot Program:*

The Form 471 application window for the Cybersecurity Pilot Program closed on September 15, 2025. Total pilot funding is capped at \$200 million for 690 applicants, including \$7.9 million for fifteen North Carolina applicants. PIA review of Pilot applications is continuing, with some applications already reported to be “Wave Ready.” Issuance of the first Funding Commitment Decisions Letters (“FCDLs”) will require FCC review and should begin shortly — hopefully before yearend.

## FY 2026 Eligible Services List – Reply Comments

The December 3<sup>rd</sup> reply comment deadline for the FCC’s draft [Eligible Services List \(“ESL”\) for FY 2026](#) drew few response perhaps because the parties who filed original comments (see our [newsletter of November 24<sup>th</sup>](#)) were largely in agreement. The only parties submitting reply comments were:

[KB & Associates](#)

[Lumen Technologies, Inc.](#)

[The State E-Rate Coordinators’ Alliance \(“SECA”\)](#)

KB & Associates wrote to second the initial comments of [Meter, Inc.](#) which, in turn, had supported the FCC’s proposal to clarify the distinction between Basic Maintenance of Internal Connections (“BMIC”) and Managed Internal Broadband Services (“MIBS”) — a position supported by other

initial comments. Lumen wrote asking the FCC to confirm the eligibility of its own Network-as-a-Service (“NaaS”) solution.

SECA’s reply comments were the most extensive focusing primarily on the broad support expressed in the initial comments, not only to address common confusion between BMIC and MIBS services as discussed in the FCC’s draft ESL, but to combine both services within a single MIBS classification effective as of FY 2026. SECA also agreed with initial proposals by [Funds For Learning](#) and the [Friday Institute for Educational Innovation](#) to remove the cost allocation currently required for “basic” firewalls and to make modern firewalls fully eligible within Category Two. Such a change would help fund cybersecurity protection for all E-Rate applicants, within the current Category Two budget limitations, as opposed to the broader protections, but limited funding, of applicants in the Cybersecurity Pilot Program.

The next step will be for the FCC to release the final version of the FY 2026 ESL. Due in part to the elimination of hotspots and school bus Wi-Fi eligibility, and the resulting amended ESL for FY 2025, and in part due to the extended government shutdown, next year’s ESL is behind schedule. Last year, the reply comment deadline was September 16<sup>th</sup> with the final ESL being released October 25<sup>th</sup>. This year, we will be lucky to see a final ESL in this calendar year, a mere two weeks before the expected opening of the Form 471 application window for FY 2026. Although we would like to see the FCC incorporate a few of the excellent suggestions made during the comment period, changes from the initial ESL draft, which did include some BMIC and MIBS clarifications, may await FCC consideration for FY 2027, the second year of the current Category Two budget cycle.

## Updates and Reminders

### *Upcoming Dates:*

- |             |  |         |            |         |            |
|-------------|--|---------|------------|---------|------------|
| December 12 | FY 2025 Form 486 deadline for applicants funded in Wave 17. 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:<br><table><tbody><tr><td>Wave 18</td><td>12/19/2025</td></tr><tr><td>Wave 19</td><td>12/29/2025</td></tr></tbody></table> | Wave 18 | 12/19/2025 | Wave 19 | 12/29/2025 |
| Wave 18     | 12/19/2025   |         |            |         |            |
| Wave 19     | 12/29/2025   |         |            |         |            |
| December 17 | Senate Commerce Committee’s FCC oversight meeting with testimony from all three Commissioners. Questioning is expected to focus on Commission actions related to public broadcasting programming and licenses (potentially interesting, but unrelated to E-Rate).  |         |            |         |            |
| January 15  | Projected opening of the FY 2026 Form 471 application window with a window closing estimated as March 26 <sup>th</sup> .   |         |            |         |            |

### *FCC Streamlined Decisions:*

The FCC issued another set of “streamlined,” precedent-based appeals and waivers on September 30<sup>th</sup>. 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 [\(or RFP\)](#) under Docket 02-6 (E-Rate) or Docket 21-93 (ECF).

In the latest streamlined decisions ([DA 25-957](#)), covering October and November, the two months spanning the government shutdown, the FCC:

1. E-Rate Dismissed:
  - a. Three Requests for Waiver dismissed as moot where USAC had already approved the underlying invoices or USAC had already taken the requested action.
  - b. Two Petitions for Reconsideration failing to identify any reasons warranting reconsideration.
2. E-Rate Granted:
  - a. Six Requests for Review (from a single state applicant) approving the competitive bidding process for which the Form 470 (or RFP) omitted a few entities.
  - b. One Petition for Reconsideration for an application filed late due to circumstances beyond the applicant's control.
3. E-Rate Denied:
  - a. Eight Requests for Waiver for late-file Form 471 applications.
  - b. Two Requests for Waiver (from one applicant) for late-files invoices or invoice extensions.
  - c. Four Requests for Waiver for late-filed appeals or waivers.
4. ECF Dismissed:
  - a. Two Requests for Waiver dismissed as moot where USAC had already approved the underlying funding requests or USAC had already taken the requested action.
5. ECF Denied:
  - a. Two Requests for Waiver for late-filed appeals or waivers.

## **USAC Cybersecurity Pilot Program Newsletter Dated December 2<sup>nd</sup>**

[USAC's Schools and Libraries Cybersecurity Pilot Program Newsletter dated December 2, 2025](#), covers the following topics:

- Somewhat prematurely, given that no Cyber applications have yet been approved, the newsletter reviews BEAR and SPI invoicing and associated invoice deadlines. The most critical point to note, looking forward, is that the invoice deadline is 90 days — not 120 days as in E-Rate — after the last date to receive service.

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 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.

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*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](mailto:join-ncerate@lists.dpi.state.nc.us). Please include your name, organization, telephone, and e-mail address.*

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