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Schools and Libraries News Brief

February 20, 2009

TIP OF THE WEEK: If you filed your Form 471 after the window closed but want to request a waiver of the deadline, wait for USAC to issue you an out-of-window letter before you file your request. You will have 60 days after the date of the appealable event (in this case, the issuance of the out-of-window letter) to file your waiver request with the FCC.

Commitments for Funding Year 2007

Funding Year 2007. USAC will release FY2007 Wave 78 FCDLs February 25. This wave will include commitments for approved Internal Connections and Basic Maintenance requests at 81% and above and denials at 80% and below. As of February 20, FY2007 commitments total just under \$2.5 billion.

On the day the FCDLs are mailed, you can check to see if you have a commitment by using USAC's [Automated Search of Commitments](#) tool.

Preparing and Submitting an Item 21 Attachment

The Item 21 attachment is an important part of each Form 471 Block 5 funding request, as it contains a detailed description of the products and services you are requesting. When you file a Form 471, the online system assigns a Funding Request Number (FRN) to each funding request. You provide an attachment number in Item 21 of each funding request and then submit that Item 21 attachment separately from the application.

Item 21 attachments can be submitted after the application filing window closes, but Program Integrity Assurance (PIA) must have your Item 21 attachments before the review of your application can begin.

If your FRN contains a limited number of products and/or services, we suggest that you [submit your Item 21 attachment online](#). Below are some thoughts to consider:

- **You must have filed your Form 471 online to be able to submit an Item 21 attachment online.** When you go to the [Apply Online](#) page and click on the button marked "Item 21 Attachment" in the Form 471 column, the system will ask you for your Billed Entity Number, application number, and security code, and then allow you to start your submission.
- **Review the [Tips and Troubleshooting guidance on the USAC website for helpful online filing information](#).** For example, the guidance advises you to clear the cache of your Internet browser and enable popups. If you follow this guidance you will have a much easier time completing the online submission process.
- **If you are offered a dropdown menu, choose the most accurate description and speed of your service.** For example, the entry "Digital Transmission Services (DTS)" has now been broken down into multiple choices, such as "DTS - ATM," "DTS - Broadband Over Power Lines," "DTS - Satellite Service," and so on. Similarly, "Broadband Services" has now been broken down into different speeds of services.
- **Some information will be pulled directly from your Form 471 to assist you in completing your Item 21 attachment.** For example, if you click on the button on page 2 of 4 labeled "Click here to import cost information from your Form 471" the system will provide that information and warn you if it differs from the total on your Item 21 Attachment. (The button is located under the orange "Save" and "Cancel" buttons.)
- **Your Item 21 attachment will be directly associated with your application, obviating any need for resubmission.** If Program Integrity Assurance (PIA) cannot locate your Item 21 attachment, you may be asked to submit a copy to your PIA reviewer. However, Item 21 attachments submitted online are easily available to reviewers through our online system.

- **You cannot make changes to your Item 21 attachment online after you click the "Submit" button.** If you find that you need to update your information, you should discuss your updates with your PIA reviewer. You can also submit an updated Item 21 attachment by email, fax, or mail, but you must be sure to mark it as an update and inform your reviewer which version is the final one.

If your FRN contains a large number of products and/or services, you may want to file by email, by fax, or on paper. If this is the case, we suggest that you:

- **Provide your Billed Entity Number, Form 471 application number, and FRN at the top of every page.** This will help us identify your Item 21 attachment, especially if pages or files become separated.
- **Do not fax your Item 21 attachment if the font is small or otherwise hard to read.** Electronic files are easiest to read as they can be enlarged on a computer screen.
- **Use documents that have already been prepared if you have them.** For example, many service providers include a complete list of products and services as part of a bid submission or an attachment to a contract. You can use this list as your Item 21 attachment or include it as part of your submission if you need to provide additional information.
- **Make sure the total cost of the individual products and services in each Item 21 attachment is consistent with the amount requested on the associated FRN.** Note that if you file online, you will receive a warning message if there is a discrepancy.
- **Keep a copy of your submission.** Many applicants find that they need a copy of their Item 21 attachment for reference during invoicing review, discussions with service providers, or for other reasons. Moreover, you are required to keep copies of all documents related to your application for five years after the last date to receive service.

Here are some additional tips for preparing your Item 21 attachment:

Telecommunications Services and Internet Access

- **Always include the number of lines and/or circuits, for example: "17 telephone lines" or "three T-1 circuits."** If PIA cannot locate this information, you will be asked to provide it during the review of your application.
- **Always include the bandwidth.** Some services, such as T-1s or T-3s, have specific bandwidths. However, other technologies that utilize these services – such as ATM or frame relay – do not. In the latter case, include the numerical bandwidth (e.g., 1.544 Mbps) in your description of the service. If you are unsure of the bandwidth, ask your service provider.
- **Specify the service(s) received.** "Phone service" is too general; "local and long-distance telephone service" or "cellular service" are more specific and clearer to the reviewer.
- **Don't lump services together.** For example, if a single FRN for telephone services actually includes multiple services, you should enter "local telephone service at \$200 per month, long-distance service at \$150 per month, and T-1 service at \$1500 per month" rather than "phone service at \$1850 per month."

Internal Connections and Basic Maintenance

- **Always note cost, quantity, and make and model numbers for equipment.** If you do not provide sufficient detail, expect questions from PIA.
- **If you are applying for Basic Maintenance of Internal Connections, provide a complete list of the equipment to be maintained.** If the list is the same as the list for your Internal Connections FRN, be sure to clearly state that on the Item 21 attachment.

On-premise Priority 1 equipment

- **Always note cost, quantity, and make and model numbers for equipment.** As above, if you do not provide sufficient detail, PIA will ask for it.
- **Provide complete documentation to demonstrate compliance with the necessary eligibility conditions.** A list of the eight conditions that must be met and a detailed explanation of each condition can be found in "Section 2 - Eligibility Conditions for Support that Include Charges for Lease of On-Premise Equipment" in the [On-premise Priority 1 Equipment guidance document](#) on the USAC website.

- **If the list of equipment is identical to the list you submitted for the previous funding year, provide the previous year's FRN.** This will speed up USAC's review process.

Cost allocations

- **For any [cost allocation](#), include the details of your calculation.** For example, if you determine that a server is two-thirds eligible, explain the method you used to make your determination and specify the eligible and ineligible uses.
- **If you are removing costs for specific products and/or services, list each removed product or service along with cost removed and the reason for removal.** Both you and your PIA reviewer will benefit from an accurate understanding of your cost allocation method and calculation at the beginning of the review process.

Keep in mind that PIA may have additional questions that are necessary to understand the eligibility of the products and/or services you are requesting. Prompt and complete answers will speed the review process along. Remember that you can ask your service provider to assist you.

Finally, here are your options for submitting your Item 21 attachment if you are not filing online:

1. Attach your submission to an email message and send it to:

attachments@sl.universalservice.org

2. Or fax your submission to:

(973) 599-6511

3. Or mail your submission to:

SLD Forms
Form 471 - Item 21 Attachment
P.O. Box 7026
Lawrence, KS 66044-7026

4. Or send your submission by delivery service to:

SLD Forms
ATTN: Form 471 - Item 21 Attachment
3833 Greenway Drive
Lawrence, KS 66046
TELEPHONE: 1-888-203-8100

For more information, refer to the [Item 21 Attachments guidance document](#) on the USAC website.

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