

[Back](#)

February 6, 2015

FY2015 WINDOW COUNTDOWN

Days to window close	48
FY2015 FCC Forms 471 filed to date	1,721
FY2015 FCC Forms 470 filed to date	25,114*

***This number includes FY2014 forms intended for FY2015.**

TIP OF THE WEEK: Be sure to review the FY2015 Eligible Services List before you file your FCC Form 470 (see below). The eligibility of some products and services has changed for FY2015, and you should be aware of those changes when you list your products and services on this form.

Commitments for Funding Years 2014 and 2013

Funding Year 2014. USAC will release Funding Year (FY) 2014 Wave 40 Funding Commitment Decision Letters (FCDLs) on February 11. This wave includes commitments for approved Priority 1 (Telecommunications Services and Internet Access) requests at all discount levels. As of February 6, FY2014 commitments total over \$2.12 billion.

Funding Year 2013. USAC will release FY2013 Wave 81 Funding Commitment Decision Letters (FCDLs) on February 12. This wave includes commitments for approved Priority 1 requests at all discount levels. As of February 6, FY2013 commitments total just under \$2.13 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.

Determining the Central Outlet or Main Administrative Branch of a Library

Libraries with outlets/branches in more than one school district must use the total student counts from the school district in which the central outlet or main administrative branch of the library is located. For some libraries – especially those in large cities – identifying the building that would be considered the main branch is straightforward. However, in other situations – rural areas with outlets/branches of similar size and importance, regional library service systems, library consortia (as opposed to consortia of libraries), applicants indicate they are not sure how to determine which library outlet/branch should be considered the main branch.

Our suggested guidance is as follows:

1. Where there is an identified and known central outlet or main library branch, use that location.
2. If no library is identified as the "main" library branch, use the library location where official library business is transacted or mail is sent. However, note that this location cannot be a non-instructional facility.

3. If neither of the two preceding options fit the situation, the library can designate one library location as the "main" library. The library should document its rationale for designating that location as the "main" library and retain that documentation with its other program documentation so that it can be produced upon request.

FCC Form 470 Reminders

February 26, 2015 is the last day to POST an FCC Form 470 and still have time to submit an FCC Form 471. If you wait to file your FCC Form 470 until February 26, you must complete all of the following on March 26, the day the filing window closes:

- Select a service provider.
- If you are taking services under a contract, enter into a legally binding contract with that service provider (while the rules no longer require a signed contract before filing an FCC Form 471, we recommend getting a signed contract as a best practice and as evidence of the existence of a legally binding contract).
- Submit your FCC Form 471 online.

We suggest that you file your FCC Form 470 as soon as possible. This will give you more time to review and prepare to file your FCC Form 471, because that form is significantly different from last year's form. Also, if there is an issue with your FCC Form 470, you will still have time to correct the issue and – if necessary – file a new form.

Below are some tips to consider before filing your FCC Form 470 and some issues we have identified with forms already filed. To the extent possible, we are reaching out to applicants that have not complied with program rules and encouraged them to re-file their forms. However, it is the applicant's responsibility to comply with program rules.

Review the [FY2015 Eligible Services List \(ESL\)](#).

The eligibility of some products and services has changed for FY2015. Specifically, we are seeing FCC Forms 470 that include webhosting, which is ineligible for FY2015. We suggest that you read the FY2015 ESL carefully to determine whether the services you intend to include on your FCC Form 470 are eligible. Remember that in some cases, a cost allocation may be required on the FCC Form 471 if the products and services have both eligible and ineligible components.

Don't mail a paper FCC Form 470 to USAC.

Going forward, FCC Forms 470 and 471 must be filed online. USAC is no longer able to process paper forms, although you can still certify forms on paper.

Provide sufficient detail on your FCC Form 470 for bidders to submit responsive bids.

On your FCC Form 470, you must clearly describe the products and services you are requesting, so that potential bidders understand the size and scope of the project and the services being requested and are able to submit responsive bids. Remember that there is a text field in Item 13 on the form that you can use to provide additional details.

For example, "as needed" and "district-wide" are not sufficient descriptions of the quantity and/or capacity of the products and services you list on the FCC Form 470 unless you are also issuing a request for proposal (RFP) where sufficient detail is provided.

In fact, for requests that are large and/or complex, you should consider issuing an RFP. Remember that, if you issue an RFP, you must note that fact on your FCC Form 470 and provide information on where to obtain a copy of the RFP.

Carefully consider what you want to get bids on before limiting your descriptions of services.

For example, "Internet access not to exceed 100 Mbps" limits responsive bids to Internet access of no more than 100 Mbps. If you might want to purchase a faster service you should specify a range that includes higher speeds. In this example, by specifying 100 Mbps, you cannot increase your speed – even if the cost does not increase – during the funding year or for the life of the contract, if it is longer than one funding year – without posting a new FCC Form 470 and opening a new competitive bidding process.

Respond to good faith requests for information from potential bidders.

If bidders do not have enough information to submit responsive bids, they may send questions to you. You must respond to all such good faith requests. You – or your consultant, if you have one – should respond to bidder inquiries in a timely manner so that competitive bidding deadlines can be met.

A generic email from a service provider describing its service offerings in general terms and asking for a call-back, or an email that can be identified as "spam," would not be considered a good faith response to an FCC Form 470 posting – especially if applicants identify a specific procedure or mechanism for submitting questions (again, Item 13 is a good place to provide that information). We do suggest that applicants archive such emails in case any questions arise.

If an applicant responds to one potential bidder's question, it must then provide the answer to that question to other potential bidders. One way to handle this would be to post all questions and answers in a centralized way, such as on a website identified for that purpose.

Don't limit your requests to make and model numbers from a specific manufacturer.

You cannot specify makes and model numbers from a specific manufacturer in an FCC Form 470 and/or an RFP without adding the words "or equivalent." Moreover, after you close your competitive bidding process, you must evaluate all bids received, including those that provide an equivalent solution.

For applicants requesting Basic Maintenance, you can specify makes and models to be maintained if you already have the equipment. However, if you are requesting the equipment on your FCC Form 470 and also requesting basic maintenance on that equipment, be sure to make that clear on your form.

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[Back](#)