

Schools and Libraries Program News Brief

March 2, 2018

TIP OF THE WEEK: The Client Service Bureau (CSB) will be open extra hours during the final week of the FY2018 application filing window to help program participants with last-minute questions. Watch next week's SL News Brief for the announcement of the schedule.

Commitments for Funding Year 2017

Funding Year 2017. USAC is scheduled to release Funding Year (FY) 2017 Wave 45 Funding Commitment Decision Letters (FCDLs) on March 8. As of March 2, FY2017 commitments total over \$2.21 billion.

On the date that FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in EPC.

USAC Website Outage for Scheduled Maintenance Tonight

USAC's website will be unavailable due to scheduled website maintenance tonight, Friday, March 2 from 9:00 PM to 9:30 PM EST. During this outage, the entire site will be converted to Hypertext Transfer Protocol Secure (HTTPS). HTTPS protects the integrity of the website by preventing intruders from tampering with communications between the website and users. It guards both visitors and websites by encrypting and securing the information being sent and received while improving performance through faster load times.

After the deployment, users will notice that all www.usac.org web pages are preceded by "HTTPS" in their URLs. Existing bookmarks to non-HTTPS addresses will continue to work but will automatically be redirected to the HTTPS address.

Please note, some USAC applications may not be available during the outage. We apologize for the inconvenience.

Reminder on March 5, 2018 Deadline for Program Participants Impacted by the Hurricanes

In order <u>DA 17-984</u>, the Federal Communications Commission (FCC) provided certain relief from program deadlines for program participants impacted by Hurricanes Harvey, Irma, and Maria (Hurricanes).

Specifically, schools and libraries located in areas of Texas, Florida, Georgia, Puerto Rico, and the United States Virgin Islands that have been designated as Major Disaster Areas eligible for Individual Assistance for the purposes of federal disaster relief by the Federal Emergency Management Agency (FEMA) who have already missed or will miss the deadline for one or more of the following forms or requests due to damage or disruption caused by the Hurricanes have a **deadline of Monday, March 5, 2018** to submit their form or request:

- Requests for review or waiver of decisions by USAC, directed to USAC or the FCC.
- FCC Form 486, Receipt of Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form.
- Filing FCC Form 472, Billed Entity Applicant Reimbursement (BEAR) Form, and FCC Form 474, Service Provider Invoice (SPI) Form.

You can verify that you qualify for this relief by logging in to EPC and exporting the report titled **Entities Within Counties Eligible for FEMA Individual Disaster Assistance (Hurricane Relief Report)**.

• To view the Hurricane Relief Report, go to the **Actions** tab in your EPC profile and click the link to export this report. EPC will then create a task for you in your **Tasks** menu. Click the task to access the report, which will appear in a spreadsheet format.

If you believe you are eligible for this relief but your entity does not appear in the Hurricane Relief Report, please open a customer service case in EPC with the prefix **H2017** in the case title. USAC will review your request and provide a response. You can also call CSB at 888-203-8100 so that they can open a case for you and provide you with the case number.

For those applicants and service providers who qualify for relief but have not yet submitted their forms and/or requests, please follow the guidance below and submit no later than 11:59 PM EST on Monday, March 5, 2018.

Appeals and waivers

File your appeal or waiver as usual, following the <u>Appeals</u> guidance on the USAC website. USAC and the FCC will use the Hurricane Relief Report to verify that your deadline to file has been extended to March 5, 2018, and will review your submission following normal procedures. If you file an appeal in EPC, it would be helpful to add the prefix **H2017** to the nickname of your appeal. Parties who rely on this waiver as a basis for filing their request for review or waiver beyond the required deadline should indicate such basis in their filing.

FCC Form 486

USAC will use the Hurricane Relief Report to verify that your deadline to file has been extended. As long as you certify your form on or before March 5, 2018, our reviewers can correct any system-generated adjustment to your service start date that would otherwise occur, and you will not be penalized or your funding reduced based on your actual certification date.

FCC Forms 472 and 474

USAC extended the invoice deadline to March 5, 2018 for Funding Request Numbers (FRNs) that feature the BENs of the entities in the Hurricane Relief Report. You can verify that your invoice deadline has been extended by searching for your FRN(s) in the <u>FRN Extension Table</u>. Invoice deadlines will be extended for the FRNs that feature these BENs even if the associated service providers are filing SPI Forms.

If you need additional time to file your invoices, you can still request a one-time, 120-day extension of this deadline. Your extension request must be submitted no later than Monday, March 5, 2018.

Non-recurring service delivery deadlines

USAC has extended the service delivery deadline to September 30, 2018 for FY2016 FRNs for non-recurring services other than special construction that feature the BENs of the entities in the Hurricane Relief Report. You can verify that your service delivery deadline has been extended by searching for your FRNs in the FRN Extension Table.

As a reminder, extensions are not automatic for applicants that receive FY2017 commitments for special construction. If these applicants need additional time to complete special construction and light the new fiber, they must file a valid FCC Form 500 and certify that construction for the special construction project was unavoidably delayed due to damage caused by the Hurricanes. These requests must be submitted on or before June 30, 2018. If USAC approves the request, the applicants will be able to verify that their service delivery deadline has been extended by searching for their FRN(s) in the FRN Extension Table.

Reminders for FCC Form 471 Filers

Now that applicants have certified their FCC Forms 470 for FY2018, we will start providing reminders for filing and certifying FCC Form 471. As you get ready to start your forms, please keep the following in mind:

The voice phase-down is almost complete.

Voice services are being phased down 20 percentage points each year starting with FY2015. For FY2018, only applicants eligible for a 90 percent discount for Category One services will be able to get a discount for voice services, and that discount will be limited to 10 percent.

If you attempt to create an FRN for voice services in EPC for FY2018, the system will only allow you to complete your request if you would be able to receive a discount on those services.

Libraries must indicate their main branch.

Library systems must designate one branch of the library system as the main branch in order for EPC to calculate the library system's discount. (Independent libraries designate themselves as their main branch.)

If you are not sure how to determine your main branch, below is the guidance we have provided in the past:

- 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.

Service types featured on the FCC Form 470 and 471 must be consistent.

The FCC Form 470 that you cite on an FCC Form 471 funding request must have been posted for the same service type as that of the funding request.

The service types are:

- Category One: Data Transmission and/or Internet Access (voice services are included in this service type on the FCC Form 470 but listed separately on the FCC Form 471)
- Category Two: Internal Connections
- Category Two: Basic Maintenance of Internal Connections
- Category Two: Managed Internal Broadband Services.

Use the RAL modification process to link new entities.

The administrative window – where you could create new individual schools or library branches and link them to your existing school districts or library systems – closed on January 10, 2018. However, if you did not get your entities updated or created in time, you can still indicate those modifications in time for the review of your FCC Form 471.

- To update the information for an existing entity, make a note of the updates you would like to provide. After you certify your FCC Form 471, submit a Receipt Acknowledgment Letter (RAL) modification indicating the changes.
- To create a new entity, contact CSB at 888-203-8100. They can create the new entity for you and give you the entity number. After you certify your FCC Form 471, submit a RAL modification and indicate that the new entity should be included on your application.

RAL modifications are included in the documentation that your Program Integrity Assurance (PIA) reviewer uses to review your form. We also suggest that you include the information about new entities and updates to existing entities in one of the FRN narrative fields on your FCC Form 471.

To submit a RAL modification:

- Search for your certified FCC Form 471 from the **FCC Forms and Post-Commitment Requests** section at the bottom of your landing page in EPC.
- Click the application number to access your form.
- From the **Related Actions** menu at the top of the page, choose **Submit Modification Request** (RAL).
- Follow the prompts to access the fields appropriate to your request and provide the information.

As a reminder, consortia can still search for their member entities and associate any missing entities with the consortium.

Store the program documentation you must retain.

Program participants are required to retain receipt and delivery records relating to pre-bidding, bidding, contracts, application process, invoices, provision of services, and other matters relating to the

administration of universal service for a period of at least ten years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

Now is a good time to find a permanent storage place for your competitive bidding documentation, while the process is still fresh in your mind. Specifically, documentation related to the competitive bidding process that you must retain includes:

- Your RFP and RFP documents. Remember that "RFP documents" are not necessarily formal
 competitive bidding documents, but rather any documents you issue as part of your competitive
 bidding process that describe your project and/or requested services in more detail than in the
 fields provided on the FCC Form 470.
- Questions from potential bidders and your answers.
- Copies of winning bids, losing bids, and disqualified bids. Simply keeping the winning bid is not sufficient. (Note, however, that service providers are not required to keep copies of losing bids that they submitted – another good reason to keep yours.)
- A copy of your bid evaluation matrix, or whatever documentation you used when you evaluated all of the bids you received and chose the winning bid.
- A copy of the contract, if you signed a contract. If you are relying on a multi-year contract from a previous year, remember that you must count your ten-year retention period starting from the most recent year that you cite that contract on a funding request.

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