E-Rate News Brief

E-RATE TIPS:

• **FCC Form 470 and Competitive Bidding Webinar**. USAC held a FCC Form 470/Competitive Bidding webinar on August 25 to discuss filing the FCC Form 470 and awareness about the competitive bidding process, which has started for Funding Year (FY) 2023. View the recording, webinar slides, and infographic.

• For applicants who have received an extension of the **FY2021 September 30, 2022 deadline for delivery and installation of nonrecurring services**, you should work with your service providers to extend your contracts to cover the additional time if necessary. You can then report the new contract expiration date to USAC by filing an FCC Form 500.

• **Visit our recently updated web content** on the following pages: The NV State Match Participation data on the Additional Discount to Match State/Tribal Funding for Special Construction page, the E-Rate Productivity Center (EPC) Resource page, and the Consultant Registration Number page.

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Commitments for Funding Year (FY) 2022 and FY2021

FY2022. USAC released FY2022 Wave 21 Funding Commitment Decision Letters (FCDLs) on September 8. As of September 14, FY2022 commitments total over $2.47 billion.

FY2021. USAC released FY2021 Wave 63 FCDLs on September 9. As of September 14, FY2021 commitments total over $2.67 billion.

On the date that FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in the E-Rate Productivity Center (EPC).

USAC Announces E-Rate 2022 Fall Training Schedule

USAC has confirmed the E-Rate Fall 2022 Training dates for applicants and service providers that wish to learn more about the program and how to participate. The training sessions will once again be virtual, and registration for each session is now available on the Webinars page. You can also click on the links below for each session to register for that specific training. The sessions are for E-Rate program participants at all levels and will include opportunities to ask questions. Eligible Services training will be scheduled once the FY2023 Eligible Services List is released.

- E-Rate Program Overview: October 18, 2:00 p.m. - 3:00 p.m. EDT

    o USAC will provide a high-level overview of the E-Rate application process from beginning to end, and explain basic program concepts for applicants and service providers. After the presentation, we will conduct a Q&A session.

- E-Rate Pre-Commitment Process: October 20, 2:00 p.m. - 3:00 p.m. EDT

    o USAC will discuss the E-Rate Pre-Commitment process. This includes how to get started, competitive bidding, applying for discounts, and Program Integrity Assurance (PIA) review. After the presentation, we will conduct a Q&A session.

- Category Two Budgets: October 25, 2:00 p.m. - 3:00 p.m. EDT

    o USAC will discuss Category Two (C2) budgets. We will provide an overview of C2 budgets and C2 budget guidance for FY2023. After the presentation, we will conduct a Q&A session.

- EPC Administrative Window: October 27, 2:00 p.m. - 3:00 p.m. EDT

    o USAC will discuss the EPC Administrative Window, the period during which applicants can make updates to their profile information in the E-Rate Productivity Center (EPC), to prepare for the upcoming FCC Form 471 application filing window. After the presentation, we will conduct a Q&A session.

- E-Rate Post-Commitment Process: November 3, 2:00 p.m. - 3:00 p.m. EDT

- o USAC will discuss the E-Rate Post-Commitment Process and other post-commitment activities. Topics include starting services, the Children's Internet Protection Act (CIPA), service substitutions, appeals, and more. After the presentation, we will conduct a Q&A session.

- Eligible Services 101: **To be announced**

FY2021 Invoicing Deadline Reminders

Friday, October 28, 2022 is the deadline to file an invoice or to request an invoice deadline extension (IDE) for most **Funding Year (FY) 2021 recurring service** Funding Request Numbers (FRNs). This invoice deadline applies to both applicant and service provider invoices – the FCC Form 472 (BEAR Form) and the FCC Form 474 (SPI Form), respectively.

Applicants who intend to file BEAR Forms for FY2021 recurring services should request an IDE if they do not have BEAR Form access through One Portal AND an approved FCC Form 498 (see August 18, 2022 E-Rate News Brief for information on how to submit the Applicant version of the FCC Form 498). **Service providers should also request an extension if they will not be prepared to invoice for these services by the October 28 deadline**.

- For information about BEAR Form access, go to the BEAR Form Access page.
- For assistance in filing and certifying the applicant version of the FCC Form 498, you can call the Customer Service Center (CSC) at (888) 203-8100. Note that you cannot invoice USAC via a BEAR Form until you have provided proof of your banking information to USAC, which you can upload after you have certified the form. USAC must approve your FCC Form 498 before you can submit a BEAR Form.

How to Request an Invoice Deadline Extension for FRNs from FY2016 and Forward
Both applicants and service providers can request an invoice deadline extension in the E-Rate Productivity Center (EPC) by following the steps below. Remember that there is no penalty for requesting an invoice deadline extension and not using it.

- **Applicants:**

  - o On your landing page, click the link to the billed entity record (the name in the "Welcome!" link near the top of the page or the first entry under the **My Entities** section).
  - o Select the **Related Actions** menu and choose **Invoice Deadline Date Extension Request**.
  - o Enter the FRN(s) you would like to extend, separated by commas.
  - o Click the **Check Eligibility** button. All of the FRNs from your list that are eligible for an extension will appear on a grid.
  - o Click **Submit**.
  - o Review the resulting **News** post for the results.

- **Service providers**:

- From the **Records** tab at the top of any EPC page, click the **Service Providers** option.
- Use the **Search** function to locate your service provider record.
- Select the **Related Actions** menu and choose **Invoice Deadline Date Extension Request**.
- Enter the FRN(s) you would like to extend, separated by commas.
- Click the **Check Eligibility** button. All of the FRNs from your list that are eligible for an extension will appear on a grid.
- Click **Submit**.
- Review the resulting **News** post for the results.

FY2022 FCC Form 486 Deadline Reminder

October 31, 2022 is the deadline to file an FY2022 FCC Form 486 if your FCDL is dated on or before July 1, 2022 and your service start date is July 1, 2022. If these conditions apply to you, please submit and certify your [FCC Form 486](#) on or before this deadline.

If your FCC Form 486 appears to be late, we will send you an FCC Form 486 Urgent Reminder Letter to remind you of the upcoming deadline. Note that we use the service start date you reported on your FCC Form 471 to determine when to send the letter, so if your service start date has changed, your deadline may have changed as well.

This reminder letter is posted to your **News** feed in EPC, and emailed to the contact person on the FCC Form 471. **These letters will start going out after October 31, 2022 for FY2022 commitments**.

You have 15 days after the date of this letter to certify your FCC Form 486 without penalty. Again, if your service start date has changed, the service start date you enter on your certified FCC Form 486 will determine whether your filing is considered late.

Applicants whose services started after July 1, 2022, or whose FCDLs are dated after July 1, 2022 (including any that have not yet been issued), will have an FCC Form 486 deadline later than October 31. However, we encourage you to submit and certify your FCC Form 486 as soon as possible after services start for FY2022 and if you can accurately make all of the certifications on the form.

EPC Administrative Window Opens October 25, 2022

The EPC administrative window is the period during which applicants can make **updates to their profile information** including student counts, NSLP participation rates, library square footage, and the entities and individuals associated with your entity including consulting firms, in EPC to prepare for the upcoming FY2023 FCC Form 471 application filing window.

Each year, USAC updates applicant profiles in EPC using the reviewed and approved profile information from their current year FCC Forms 471. We do this so that applicants can start the application process for the upcoming funding year with information in their profiles that is accurate as of the date of their FCDL.

USAC has completed this process for applicants whose profile information was updated during the Program Integrity Assurance (PIA) review of their FY2022 applications. Applicants can now review their profiles and make any additional updates.

The administrative window will **open Tuesday, October 25, 2022** and will close shortly **before the FY2023 application filing window opens in early 2023**. After this time, applicant profiles will be locked and you will not be able to make changes to your profile information.

For detailed information on updating entity profiles, you can refer to the [EPC Administrative Window](#) page. Here are a few reminders for those of you who are ready to start updating your profiles:

- School districts report their student counts separately for two different purposes – to calculate their discount and to calculate their Category Two (C2) budget. For the C2 budget calculation, you can request a [replacement C2 budget](#) if student count (or square footage for libraries) information has changed but you are not required to do so. School districts can update their individual school profiles or report a total number in the school district profile.
- If you have new child entities (individual schools for school districts or library branches for libraries), the Customer Service Center (CSC) can create them for you. Open a customer service case in EPC or call CSC at (888) 203-8100 for assistance.
- For changes affecting your FY2022 application, submit an FY2022 [Receipt Acknowledgment Letter (RAL) modification request](#) or FY2022 appeal before you add new entities or new entity subtypes to your organization's profile information. This will allow us to process your RAL modification or appeal more quickly.

The November 18, 2021 [EPC Window Training slides](#) provide instructions on how to add/update users, update entity profiles, request a replacement C2 budget if you choose to do so, and more tips.

UEI Requirement on Service Provider FCC Form 498 Coming in November

On April 6, 2022, the FCC released a Public Notice ([DA-22-371](#)) announcing that the General Services Administration's SAM.gov will transition from the use of the Data Universal Numbering System (DUNS) number to the SAM.gov-assigned Unique Entity Identifier (UEI). USAC is continuing to work with the FCC to complete a full transition for the collection of UEIs and the use of SAM.gov to register for UEIs and to obtain payee Automated Clearing House (ACH) and Electronic File Transfer (EFT) information from Universal Service Fund (USF) recipients. The UEI will be required for all participants with a 498 ID in the Rural Health Care (including the Connected Care Pilot Program), Lifeline, E-Rate, and High Cost USF programs.

To prepare for this transition, USAC will update the [FCC Form 498](#) for all **service providers** in the **fourth quarter of 2022** to require **all service provider entities** to have an active UEI in order to submit or modify their FCC Form 498. After this deployment, the FCC Form 498 system (E-File) will only accept the UEI if the following criteria are met:

- The SAM.gov registration for your entity is active,
- The Employer Identification Number (EIN) for the UEI matches the EIN for the FCC Registration Number, and
- The EIN for the UEI matches the EIN on the FCC Form 498.

The update of the FCC Form 498 will only affect service provider entities **that must submit a new FCC Form 498 or revise their current FCC Form 498** after the fourth quarter 2022 deployment.

For USF program recipients, program payments will continue as normal without full entity SAM.gov registration. However, USF Program recipients that receive direct payments will be required to complete the full entity registration when the transition to using SAM.gov for payment information is made by the U.S. Treasury in 2023.

Beginning in November, USF program recipients who are **service providers** and submit a new FCC Form 498 or who want to revise their FCC Form 498 should complete their full entity registration in SAM.gov to obtain a UEI and provide their UEI in E-File.

If you are already registered in SAM.gov, you have a UEI. To find your UEI, log into SAM.gov and select the Entity Management widget in your Workspace or log in and search Entity Information. Please ensure that your SAM.gov registration is active and the EIN for your UEI, the FCC Registration Number, and the FCC Form 498 numbers match. Once you've completed these steps, add your UEI to your FCC Form 498 ID. Entities' registrations in SAM.gov require **annual renewal** or the accounts will be deactivated. Please ensure that your organization annually renews its SAM.gov registration prior to the expiration date listed in your entity's record in SAM.gov.

If you are not registered in SAM.gov, you will need to register for a UEI and allow up to six weeks for the registration to be completed on SAM.gov. Once you register with SAM.gov, you will be automatically assigned a UEI. You can then add your UEI to your FCC Form 498 ID at USAC. Even if you don't need to modify your FCC Form 498 ID immediately, you should complete your SAM.gov registration as early as possible and add your UEI to your FCC Form 498 ID now so that you have it when it is required for all entities that receive direct payments through the USF programs.

If you need help obtaining a UEI or have additional questions, please contact USAC's Customer Service Center, Contributors/Service Providers option, at (888) 641-8722 or visit SAM.gov for additional information on how to obtain a UEI or register your entity.

FCC Requests Comments on Draft ESL for FY2023

On August 22, the FCC released a Public Notice (DA 22-878) establishing the comment period for the E-Rate FY2023 Eligible Services List (ESL).

Comments on the draft ESL, which is attached to the Public Notice, are due to the FCC **on or before September 21**. Reply comments are due to the FCC **on or before October 6**. For information on filing comments with the FCC, please refer to the Public Notice.

Common Questions about the FCC Form 470

Now that applicants are filing FCC Forms 470 for FY2023, we are providing answers to some common questions coming into the Customer Service Center.

When can I file an FCC Form 470?
You can file an FCC Form 470 for FY2023 now. The FCC Form 470 for FY2023 became available on July 1, 2022.

What is an RFP and is one required?
In general, a Request for Proposals (RFP) is a formal bidding document that describes a project and requested services in sufficient detail so that potential bidders understand the scope, location, and any other requirements. An RFP may be known by a variety of names, for example, an Invitation for Bid (IFB) or Request for Quote (RFQ). In most instances, RFPs are not specifically required as part of the E-Rate program, but you must issue one if it is required by FCC rules or by your state or local competitive bidding or procurement rules.

We use "RFP" or "RFP document" generically to refer to any bidding document issued as part of your competitive bidding process that describes your project and requested services in more detail than in the fields provided on the FCC Form 470. If you are issuing an RFP and/or one or more RFP documents, you

are required to upload those documents to your FCC Form 470. Applicants should make sure their latest RFP is available for a full 28 days before selecting a service provider.

How do I count the 28-day competitive bidding waiting period? Do I exclude weekends and holidays?
Applicants must wait a **minimum of 28 calendar days** before selecting a service provider. This means that they may select a service provider **on or after the 29th day** from the day they certified the FCC Form 470 including any weekends or federal holidays.

- To assist applicants and ensure they meet their 28-day minimum, EPC calculates the date when their 28-day waiting period ends. USAC refers to this date as the **Allowable Contract Date or ACD**. The ACD can be found in the Receipt Notification Letter posted on your **News** tab in EPC. The letter is posted shortly after you certify your FCC Form 470.
- If you make a substantive change to the scope of your project and/or the services you are requesting, **you must restart your 28-day waiting period on the day you make the change** – for example, if you post a new Request for Proposal (RFP) document to your FCC Form 470. In this case, you must count the 28 days yourself – EPC does not re-calculate a new ACD for you.
- Remember, the 28-day waiting period is a **minimum requirement**. You can wait longer than 28 days.

What changes can I make to my FCC Form 470?
You can make the following changes to a certified FCC Form 470:

- Edit the nickname you created for your form.
- Change the main contact person on the form.
- Edit the technical contact person you identified on the form.
- Add an RFP document.
  - If you did not add at least one RFP document to your form before it was submitted and certified, **you will have to submit and certify a new form** in order to be able to attach an RFP document.
  - If you issue an RFP document AFTER an FCC Form 470 is submitted and certified, you **MUST** upload the RFP document to that certified FCC Form 470.

How do I make corrections to the FCC Form 470?

- **Navigate to the form in EPC. You can do this in two ways:**
  - **Go to the bottom of your landing page and search for and locate your form using the search criteria provided, or**
  - **Click the Records tab, choose FCC Forms 470, and use the search criteria provided to locate your form.**
- **Choose Related Actions from the menu.**
- **Click the link for the action you want to take from the menu.**

My FCC Form 470 does not show the correct number of entities. What do I need to do?
We strongly recommend updating the entities in your profile in EPC before you start a form. CSC can help you create entities, add and remove entities, and create annexes as needed. If you do this work before you submit and certify your FCC Form 470, the number of entities should be correct.

However, if your entity count is still not correct, you can add an RFP document to your form to explain the discrepancy (for example, if services are delivered to annexes that have a different address but EPC did not count them as separate entities). Remember, though, that

you must have attached at least one RFP document to your form in order to add another one after the form is certified. Otherwise, you must start a new form.

What service/function should I list this service/product under on the FCC Form 470?
You may not be sure exactly where on the FCC Form 470 to list a particular product or service. If the product or service appears to fit into more than one category of service or service type, you should:

- List the product or service under all of the categories or service types where it fits, and
- Provide a detailed explanation of the services you are requesting in the narrative field of the FCC Form 470 and/or your RFP or RFP document.

Is an FCC Form 470 always required?
No. There are some limited situations where applicants do not need to submit and certify an FCC Form 470:

- If you have a multi-year contract that is still in effect and the costs/services are still within the terms of the establishing FCC Form 470. However, you do need to file a new FCC Form 471 each funding year.
- Commercially Available Business class Internet Option (CABIO) Category 1 (C1) services are exempt from the FCC Form 470 posting requirement if they meet **certain requirements**.

What should I do if I submitted and certified an FCC Form 470 and left off some services?
The clearest way to proceed is to submit and certify a new FCC Form 470 and include all of the services you want on that form and its associated RFP and/or RFP documents. If you attached an RFP document to the original form, you can attach another document to your original form to notify bidders that they should use the information in the new FCC Form 470 (include the new FCC Form 470 number) instead of the original one.

You may also attach one or more RFP documents to your existing form, if you attached at least one RFP document to that form before it was certified, to add the services that were omitted. Keep in mind that the addition of those services will probably be a substantial change, and you must restart your **28-day waiting period** from the date you add the document to your FCC Form 470.

A third option is to submit and certify a new FCC Form 470 that contains only the additional services. If you choose this option, be very clear whether you want bids that include all of the products and services in both forms, or if you are willing to accept separate bids for the services on each form.

For more information on the FCC Form 470 and the competitive bidding process, you can refer to the following resources available on the USAC website:

- Applicant Step 1 - **Competitive Bidding**
- Applicant Step 2 - **Selecting Service Providers**
- **Instructional videos** on how to file the FCC Form 470.

Other guidance documents

- **Competitive Bidding Infographic**
- **Eligible Services Overview**

- **Document Retention**