Schools and Libraries Cybersecurity Pilot Program

March 11, 2025

Pilot FCC Form 471 Available March 18, 2025

The Pilot FCC Form 471 application filing window will run from March 18, 2025, at 8 a.m. E.T. through September 15, 2025, at 11:59 p.m. E.T. Pilot participants may request Pilot Program funding using the Pilot FCC Form 471 after they complete the competitive bidding process and select their service provider(s). All program participants must submit a Pilot FCC Form 471 during the application filing window, along with completing and submitting their Pilot FCC Form 484 Part 2, to receive Pilot Program funding for eligible cybersecurity services and equipment.

USAC will host a training on the Pilot FCC Form 471 on March 25, 2025, at 3 p.m. ET. Please register to participate in the training.

USAC will provide ongoing resources and training to help all participants understand the Pilot Program requirements, complete necessary forms, and successfully participate in the program. Frequently asked questions and responses are posted to the FCC's FAQ webpage. This newsletter highlights recent FAQs.

Competitive Bidding and the Pilot FCC Form 470

Unless eligible for a competitive bidding exemption, Pilot Program participants must conduct a fair and open competitive bidding process to identify and request the cybersecurity equipment and services they need for the Pilot, so that potential service providers can review those requests and submit bids in response to them. Participants begin the competitive bidding process by submitting and certifying the Pilot FCC Form 470 in the Cybersecurity Pilot Program portal. Pilot Program participants must wait at least 28 from the date the Pilot FCC Form 470 is certified and posted on USAC's website before entering into a legally binding agreement or contract with a service provider(s). This date is known as the Allowable Contract Date (ACD).

Pilot Program participants can begin the competitive bidding process now. For more information about the process, please visit the Competitive Bidding webpage on USAC's website.

USAC hosted a training on February 4, 2025 to walk participants through the competitive bidding process and requirements and highlight key features of the Pilot FCC Form 470. Visit the Webinars webpage to view the webinar recording and slides.

Competitive Bidding-Related FAQs

Q: What is the process for requesting a competitive bidding exemption (CBE)?

A: If you meet the requirements for a CBE (see FAQ 6.4), you must submit your request to USAC for review and approval by emailing CybersecurityPilotMSAorSMC@usac.org. Within three business days, USAC will send you a secure BOX link, which you will use to submit any documents and information needed, such as a copy of the Master Services Agreement (MSA) or State Master Contract (SMC) and the corresponding E-Rate FCC Form 470 that initiated the competitive bidding process that resulted in the MSA/SMC.

If approved, the MSA/SMC along with its establishing E-Rate FCC Form 470 will be made available on USAC's website as a contract exempt from the competitive bidding requirements so that Pilot participants may review and make use of these contracts where appropriate.

Q: My cybersecurity needs have changed since submitting the FCC Form 484 Part 1. Can I seek bids for different services and/or equipment that would better address my current needs, even if they are different from what I included on my FCC Form 484 Part 1?

A: Yes, you may seek bids for different cybersecurity services and/or equipment than was included in the proposed project plan included in your FCC Form 484 Part 1. However, your request is still limited to your overall three-year budget for the Pilot Program as reflected in your acceptance letter, and support is only available for eligible equipment and services. In addition, once USAC has issued a Funding Commitment Decision Letter (FCDL) approving a participant's requested cybersecurity services and equipment, any subsequent changes would require approval consistent with the Pilot Program rules.

Q: Can I seek bids for additional cybersecurity services and/or equipment if the bids I received are lower than my overall budget?

A: Yes. If you received bids lower than your overall, three-year budget and have funds remaining within your budget, you may, but are not required to, seek bids for additional cybersecurity services and/or equipment so long as the deadline for submitting an FCC Form 470 has not passed and the request for bids covers the three-year program term. As a reminder, the last day to post an FCC Form 470 to meet the 28-day waiting period is August 18, 2025 at 11:59 p.m. E.T. Pilot participants may also return unneeded funds if they do not wish to seek bids for additional cybersecurity services and/or equipment.

Q: I am a service provider and am interested in submitting bids in response to selected participants' requests for bids. What are the parameters around communicating with selected Pilot participants?

A: Service providers must ensure that all communications with selected Pilot participants do not violate the requirement that the competitive bidding process be fair and open (see generally section 54.2005 of the Pilot Program rules). As in the E-Rate program, a fair and open competitive bidding process means that:

- All bidders must be treated the same;
- No bidder can have advance knowledge of the Pilot Program project information;
- There are no secrets in the process. All bidders must know what is required of them, and information must be shared with all bidders; and
- Service providers and potential service providers cannot offer or give gifts to Pilot participants (including their consultants and other representatives) (subject to section 54.2005(d)(3) and (4) of the Pilot Program rules).

Q: I am a service provider and am interested in submitting bids in response to selected participants' requests for bids. How can I look up Pilot FCC Forms 470 to which I might want to respond?

A: If you wish to view Pilot FCC Forms 470 posted by Pilot participants, you can use the [Cybersecurity Pilot FCC Form 470 Download Tool](#) to search for cybersecurity equipment and services that you may bid on. All certified Pilot FCC Forms 470 will be available through this tool as they are submitted by Pilot participants. Pilot participants have until Monday, August 18, 2025 at 11:59 p.m. E.T to submit and certify their Pilot FCC Form(s) 471.

Q: Can I submit more than one FCC Form 470 to seek bids for eligible cybersecurity services and/or equipment?

A: Yes, Pilot participants may submit more than one FCC Form 470 through the Cybersecurity Pilot Program portal and separate components of their overall project. However, each FCC Form 470 must cover the full, three-year program term and must be submitted by the deadline of August 18, 2025 to allow for the timely submission of the FCC Form 471 before the application filing window closes on September 15, 2025.

Pilot FCC Form 484 Part 2

All Pilot Program participants were required to complete and submit the Pilot FCC Form 484 Part 1 to indicate their interest in being selected for the Pilot Program. As a selected participant in the Pilot Program, you are now required to complete and submit the second portion of the FCC Form 484 application, i.e., the Pilot FCC Form 484 Part 2. Part 2 of the Pilot FCC Form 484 collects more detailed cybersecurity data and Pilot project information from Pilot participants than Part 1 of the form. The data gathered on the form will help the FCC evaluate whether, and to what extent, it should use the Universal Service Fund (USF) to support the cybersecurity needs of eligible schools and libraries going forward.

As a reminder, due to the sensitive nature of the cybersecurity-related information collected on Parts 1 and 2 of the FCC Form 484, the FCC will treat the information collected as presumptively confidential under its rules and withhold it from routine public inspection. The FCC also will not share the information collected on the form with other federal agencies for incident reporting or compliance purposes.

The Pilot FCC Form 484 Part 2 is now available in the Cybersecurity Pilot Program portal and must be submitted by September 15, 2025, at 11:59 p.m. E.T. Pilot participants cannot receive a funding commitment decision letter (FCDL) until their Pilot FCC Form 484 Part 2 is submitted to USAC. Participants who fail to timely submit a Pilot FCC Form 484 Part 2 and/or the Pilot FCC Form 471 will be subject to removal from the Pilot Program.

For more information about the Pilot FCC Form 484 Part 2, please visit [USAC's website](#).

USAC hosted a Pilot FCC Form 484 Part 2 training on February 13, 2025. Visit the [Webinars webpage](#) to view the webinar recording and [slides](#).

Pilot FCC Form 484-Related FAQs

Q: Will the information I provide on the FCC Form 484 Part 1 or Part 2 be made public?

A: Recognizing that the FCC Form 484 application would contain sensitive information, the FCC bifurcated the application into Parts 1 and 2, in part to limit the amount of sensitive cybersecurity information provided by applicants at the application stage and by participants after being selected. As such, the FCC Form 484 Part 1 required applicants interested in participating in the Pilot to provide basic information about their cybersecurity needs, experience, and plans to use Pilot Program funding if selected for the Pilot. In contrast, the FCC Form 484 Part 2 collects more detailed cybersecurity information, but only from those applicants who have been selected as Pilot participants.

To protect the sensitive cybersecurity information collected on both Parts 1 and 2 of the form, the form can only be accessed by persons designated by the applicant's or participant's E-Rate Productivity Center (EPC) Account Administrator, USAC, and the FCC. Neither applicants nor participants are able to view each other's FCC Forms 484, and the data collected is not publicly available.

In short, due to the sensitive nature of the cybersecurity-related information collected on Parts 1 and 2 of the FCC Form 484, the FCC will treat the information collected as presumptively confidential under its rules and withhold it from routine public inspection. The FCC also will not share the information collected on the form with other federal agencies for incident reporting or compliance purposes.

Key Dates

January 17, 2025: Pilot FCC Form 470 and Pilot FCC Form 484 Part 2 available in the Cybersecurity Pilot Program Portal.

March 18, 2025: Pilot FCC Form 471 application filing window opens.

July 1, 2025: Last date to voluntarily withdraw from the Pilot Program.

August 18, 2025: Deadline to submit the Pilot FCC Form 470.

September 15, 2025: Pilot FCC Form 471 application filing window closes and deadline to submit the Pilot FCC Form 484 Part 2.

Additional Cybersecurity Pilot FAQs

Q: I have been selected as a Pilot participant. When are the deadlines for submitting the FCC Form(s) 470, FCC Form(s) 484 Part 2, FCC Form(s) 471, and FCC Form(s) 472/474?

A: The following are the deadlines associated with the FCC Form 470, FCC Form 484 Part 2, FCC Form 471, and FCC Forms 472/474.

FCC Form 470: The FCC Form 470 is currently available through the Cybersecurity Pilot Program portal and must be completed and submitted no later than August 18, 2025 at 11:59 p.m. E.T. (i.e., 28 days before the close of the FCC Form 471 application window).

As in the E-Rate program, Pilot participants are required to wait until the Allowable Contract Date (ACD), which is 28 days from the date that the Pilot FCC Form 470 is certified and posted on USAC's website, before entering into a legally binding agreement or contract with a service provider.

FCC Form 471: The application filing window for the FCC Form 471 will open on March 18, 2025 at 8 a.m. E.T. and will close on September 15 at 11:59 p.m. E.T. To request discounts on Pilot-eligible services and equipment, Pilot participants must complete and submit this form through USAC's Cybersecurity Pilot Program portal.

Pilot participants are not allowed to certify and submit the Pilot FCC Form 471 until they have waited at least 28 days (i.e., the ACD) after the Pilot FCC Form 470 is submitted and certified.

FCC Forms 472/474: Once a Pilot participant receives a Funding Commitment Decision Letter (FCDL) committing funding for the eligible services and/or equipment, it may begin to submit requests for reimbursement (i.e., the FCC Form(s) 472/474) after the receipt or delivery of the requested eligible services and/or equipment. Requests for reimbursement must be submitted to USAC through the Cybersecurity Pilot Program portal within 90 days after the last day to receive service. Pilot participants or service providers may request a one-time extension of the invoice filing deadline, if the request is timely filed (i.e., before the invoice filing deadline date).

Q: I have been selected as a Pilot participant. When can I expect to receive my Funding Commitment Decision Letter (FCDL) and when will funding be made available? Will there be funding waves as in the E-Rate program?

A: USAC will issue an FCDL to both the participant and the selected service provider(s) approving, modifying, or denying the funding requests following review of the FCC Form(s) 471 and the submission of the FCC Form 484 Part 2. The FCDL will provide the amount of committed funding available for each request based on the Pilot participant's three-year budget, will cover the three-year term of the Pilot Program, and will include a reminder to participants that funding is dependent upon full compliance with the FCC rules. USAC will issue the commitments in waves as in the E-Rate program following the first commitment wave for the Pilot Program.

Once a Pilot participant receives an FCDL committing funding for the eligible services and/or equipment, it may begin to submit requests for reimbursement (i.e., the FCC Form(s) 472/474) after the receipt or delivery of the requested services and/or equipment. See FAQ 1.5. As in the E-Rate program, USAC will review and process requests for reimbursement in batches and submit them for approval to the FCC. Disbursements are then made through the Department of Treasury.

Q: When is the service start and end date for the Pilot Program?

A: The service delivery start date for the Pilot Program is March 18, 2025 (i.e., the first day of the FCC Form 471 application filing window), and the service delivery deadline for each funding request number (FRN) is three years from the date of the first Funding Commitment Decision Letter (FCDL) issued for each funding request.

Q: Can I receive reimbursement for a new multi-year license, provided it is for eligible services?

A: Yes. Provided they meet all other procurement and competitive bidding requirements, participants are permitted to seek funding for multi-year licenses for eligible recurring services that are longer than three years. However, only services delivered within the three-year Pilot Program time period can be reimbursed through the Program.

Q: If I paid for the cost of the multi-year license upfront, can I get reimbursed for the total cost in year 1?

A: Yes, you may receive reimbursement for the cost of the license in the first year of the Pilot Program if you paid for the cost upfront. However, only services delivered within the three-year Pilot Program time period can be reimbursed through the Program. See FAQs 4.4 and 6.9.

Thus, for example, if you had a five-year multi-year license and paid for the total cost upfront, the Pilot Program would only reimburse you for the portion of the multi-year license cost covering the services delivered within the three-year Pilot Program term. The portion of the license cost covering the remaining two years is not reimbursable through the Pilot Program.

Q: I received a letter from USAC notifying me that I have been selected as a participant in the Pilot Program. Does the amount noted in the letter reflect my total, approved budget for the three-year program term or does it reflect the approved budget for just the first year?

A: Pilot participants that were selected as participants in the program via the [Wireline Competition Bureau's January 16, 2025 Public Notice](#) received an acceptance letter from USAC, the Administrator of the Pilot Program, notifying them of their selection and specifying the preliminary pre-discount commitment amount for the three-year Pilot Program term. For the vast majority of Pilot Program participants (i.e., those participants that do not fall within the 90% discount percentage and 81% National School Lunch Program (NSLP) discount band), this amount represents the full award of your maximum Pilot Program budget for the three-year term. For those participants that fall within the 90% discount percentage and 81% NSLP discount band and who will, as a result, receive support on a pro-rata basis, this amount represents a partial award of your maximum Pilot Program budget for the three-year term.

As explained in the letter, the preliminary pre-discount commitment amount can be used during the budget, competitive bidding, and bid selection process for the Pilot Program and is based on the information and details provided during the submission and evaluation of the FCC Form 484 Part 1. Unless you are a participant that falls within the 90% discount percentage and 81% NSLP discount band, we do not anticipate that this preliminary pre-discount commitment will increase as the Pilot Program funding amount is capped at $200 million. Pilot participants that fall within this discount percentage and NSLP discount band and received pro-rata based budgets, however, may see this amount increase to the full three-year budget amount as available funds permit.

Q: Are the FCC Forms 471 subject to Program Integrity Assurance (PIA) reviews similar to those conducted in the E-Rate program? If so, what can I expect from them?

A: To ensure compliance with the FCC's rules, FCC Form(s) 471 submitted in the Pilot Program will be subject to PIA reviews similar to those reviews USAC conducts on the FCC Form(s) 471 submitted in the E-Rate program. Pilot

participants can expect USAC to reach out to the contact(s) listed on the FCC Form 471 to inquire about information provided on the form and/or request supporting documentation. To expedite the review of these forms, we encourage Pilot participants to timely respond to such requests.

Q: Is there any further information regarding the reporting requirements available? When are they due and will training on these requirements be provided to Pilot participants?

A: The Wireline Competition Bureau (Bureau) provided further information regarding the reporting requirements in a [Public Notice](#) released on January 16, 2025. Specifically, regarding the submission of the initial report, information provided in the FCC Forms 484 Part 1 and 2 constitutes the necessary data to establish a reporting baseline for purposes of meeting this requirement; and, thus, the timely submission of these forms satisfies this requirement. Applicants were required to submit the FCC Form 484 Part 1 by November 1, 2024, and selected Pilot participants are required to submit Part 2 of the form by September 15, 2025. No other additional information is required of Pilot participants to satisfy the initial reporting requirement.

Regarding the submission of the annual and final reports, Pilot participants are required to submit each annual report no later than 60 days following the conclusion of the first and second years of the Pilot Program and the final report no later than 60 days following the conclusion of the final year of the three-year Pilot Program. The Bureau will announce when the annual reporting form has been approved by the Office of Management and Budget, and the Bureau or USAC will provide additional information regarding the deadlines for submitting the annual and final reports. As noted in the [Public Notice](#) , the deadline for the submission of the annual and final reports will be staggered based on the issuance date of a Pilot participant's Funding Commitment Decision Letter(s).

For the annual reports, Pilot participants will be required to respond to questions similar to those included in the FCC Form 484 Part 1 and Part 2, as well as additional questions, which will allow participants to provide further detail regarding their cybersecurity expertise and any cybersecurity events that have taken place during the reporting period. A list of questions Pilot participants should be prepared to answer is included in the [Public Notice](#).

We expect USAC to announce trainings regarding these reporting requirements as the deadlines for submitting them approach.

Stay Connected

USAC will share information, resources, and training opportunities throughout the Pilot Program. If you received this email, you are signed up for ongoing program outreach.

If you have additional contacts who you would like to receive information about trainings, program updates, and deadline reminders – or if this email was forwarded to you – please [sign up for program outreach](#). Please note that signing up for email outreach will not change your contact settings in the E-Rate Productivity Center (EPC) or the Cybersecurity Pilot Program Portal.

Need Help? Contact Us!
Call us at (888) 203-8100 Monday through Friday, 8 a.m. to 8 p.m. E.T. or submit a case in EPC.