

Summary of E-rate Reform Order, FCC 14-99

as of 8/7/2014

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	Issue	Details	Effective
DISCOUNT CALCULATION CHANGES			
1	District-Wide Discounts	All discounts for both Priority 1 and Priority 2 requests will be calculated on a district-wide, simple average basis, rather than using a building-by-building, weighted average discount. Formula: Divide the total number of NSLP eligible students in the district by the total number of enrolled students in the district. The district-wide NSLP% is then applied directly to the Discount Matrix (along with the urban/rural status, see below) to determine the District's discount that will be used for all buildings. This is identical to how libraries currently calculate their E-rate discounts. Therefore all districts will now have a straight, district-wide discount taken directly from the discount matrix (i.e., 20, 40, 50, 60%, etc.). Districts will be permitted to add buildings after a FCDL is issued. For nonpublic schools and other entities that are not considered school districts, those entities should determine their discount using all E-rate eligible students that fall under their financial or operational control.	FY 2015
2	Consortia Discounts	Consortia will continue to use the simple average of each consortia member's discounts, but will use a district's new district-wide discount in the calculation instead of each district's weighted average discount. Also, the Order reiterates that the amount of support for a consortium member should be based on the discount rate to which the member is entitled for services provided directly to the member, and for shared services if it is not unreasonably burdensome to compute the individual member's share of benefits.	FY 2015
3	Library Discount	Library systems that have branches or outlets in more than one public school district should use the address of the central outlet or main administrative office to determine which public school district the system is in and should use that school district's discount when applying as a library system or on behalf of individual libraries within that system.	FY 2015
4	Rural Definition	U.S. Census definitions of rural and urban will be used to determine whether applicants deserve the additional rural discount. County-wide rural/urban designations will no longer be applicable. All areas that are not considered 'urban' will be deemed 'rural.' For the 2010 Census, urban areas are defined as densely settled core of census tracts that have 50,000 or more people (urbanized areas), along with adjacent territories of at least 2,500 people (urban clusters) that link to the densely settled core. If a majority of schools in a district are in 'rural' locations (determined by the building's physical address) the entire district will qualify for the additional rural discount.	FY 2015
5	Surveys	Income survey results can no longer be extrapolated. Discounts will only be based on the income surveys actually collected.	FY 2015

6	Community Eligibility Provision (CEP)	<p>Schools opting into the Community Eligibility Provision under the National School Lunch Program will use the 1.6 multiplier as is currently permitted by USDA and other federal programs. The CEP program provides a new alternative to NSLP household applications for free and reduced price meals in high poverty local educational agencies as it does not require schools participating in CEP to obtain individual income eligibility applications from each student. Instead, it derives estimates of the NSLP eligible population from existing data from other income-based programs. In order to qualify for CEP, a school, group of schools, or the entire district must have an Identified Student Percentage of 40% or more and must offer both breakfast and lunch daily.</p> <p>Presumably, the NSLP eligibility data that will be entered into the Form 471, Block 4 discount calculation worksheet will already contain the 1.6 multiplier. CEP schools must retain back-up calculations which may be requested during PIA and audits.</p> <p><i>Please note: The previous FCC guidance that CEP schools must use the NSLP data from the year before they opted into CEP has been repealed.</i></p>	FY 2015
CATEGORY 1 SERVICE ELIGIBILITY CHANGES			
7	Priority 1 Name Change	Traditional Priority 1 will be called Category 1 and will be focused on broadband and Internet access. Category 1 services will be funded first before Category 2 equipment and services are funded in order to ensure there is enough funding available to cover all Category 1 funding requests.	FY 2015
8	Paging, Webhosting, E-mail	Beginning in FY 2015, paging, webhosting, and e-mail will no longer be eligible for E-rate discounts.	FY 2015
9	Wireless Data Plans	<p>Beginning in 2015, cellular data plans and mobile broadband services (such as wireless services to an iPad or aircards) will not be eligible in buildings that have Wi-Fi access.</p> <p>In buildings that do not have Wi-Fi access, cellular data and mobile broadband services will <u>only</u> be eligible where the school or library can prove that individual data plans are the most cost effective option for providing internal broadband access for portable mobile devices within those schools and libraries. In such cases, applicants must prove either that installing a WLAN is not physically possible, or provide a comparison of the costs of individual data plans vs. installing a WLAN solution. Applicants requesting such services should be prepared for extensive, stringent PIA cost effectiveness reviews.</p> <p>Library bookmobiles will be considered an exception.</p>	FY 2015
10	Voice Service Components	<p>Beginning in FY 2015, the following components of voice service will no longer be eligible: directory assistance charges, text messaging, custom calling services, direct inward dialing (DIDs), 900/976 call blocking, and inside wire maintenance plans.</p> <p>All such charges must be deducted from both the pre-discount cost included on the Form 471 and all associated vendor or application reimbursement invoices (SPIs and BEARs) for 2015 invoices. Such charges do NOT have to be deducted for FY 2013 or 2014 BEARs or SPIs.</p>	FY 2015

11	Voice Service Phase-Out	<p>All voice services, including cellular voice, local, long distance, POTS, 800 service, Centrex, PRI lines, and hosted VOIP, will be phased out from FY 2015 – FY 2018. Voice services will no longer be eligible beginning with FY 2019.</p> <p>Beginning with Funding Year 2015, applicants will receive a 20% lower discount for these funding requests. The phase out schedule is as follows:</p> <table border="1" data-bbox="525 349 1774 1015"> <thead> <tr> <th rowspan="2">If Your District's Discount is:</th> <th colspan="5">Voice Discount Will Be:</th> </tr> <tr> <th>FY 2015</th> <th>FY 2016</th> <th>FY 2017</th> <th>FY 2018</th> <th>FY 2019</th> </tr> </thead> <tbody> <tr> <td>20%</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> </tr> <tr> <td>25%</td> <td>5%</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> </tr> <tr> <td>40%</td> <td>20%</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> </tr> <tr> <td>50%</td> <td>30%</td> <td>10%</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> </tr> <tr> <td>60%</td> <td>40%</td> <td>20%</td> <td>No Funding</td> <td>No Funding</td> <td>No Funding</td> </tr> <tr> <td>70%</td> <td>50%</td> <td>30%</td> <td>10%</td> <td>No Funding</td> <td>No Funding</td> </tr> <tr> <td>80%</td> <td>60%</td> <td>40%</td> <td>20%</td> <td>No Funding</td> <td>No Funding</td> </tr> <tr> <td>90%</td> <td>70%</td> <td>50%</td> <td>30%</td> <td>10%</td> <td>No Funding</td> </tr> </tbody> </table> <p>All voice FRNs must be included in a separate Block 5 funding request and cannot be 'bundled' with other requests so the online system can deduct the 20 percentage points from the discount rate for that specific FRN. For example, an invoice that includes voice and broadband service must listed on two separate funding requests.</p>	If Your District's Discount is:	Voice Discount Will Be:					FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	20%	No Funding	No Funding	No Funding	No Funding	No Funding	25%	5%	No Funding	No Funding	No Funding	No Funding	40%	20%	No Funding	No Funding	No Funding	No Funding	50%	30%	10%	No Funding	No Funding	No Funding	60%	40%	20%	No Funding	No Funding	No Funding	70%	50%	30%	10%	No Funding	No Funding	80%	60%	40%	20%	No Funding	No Funding	90%	70%	50%	30%	10%	No Funding	FY 2015
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12	Bidding Exemptions for Bundled Internet Packages	<p>Applicants (presumably small schools and libraries) that wish to purchase a commercially-available, business-class broadband/Internet package that costs less than \$300/month (pre-discount), will be permitted to do so without complying with the Form 470 competitive bidding requirement. The exemption will only apply if the package offers speeds of at least 100 mbps downstream and 10 mbps upstream per building and the charges cannot be averaged across multiple buildings. The annual pre-discount \$3600 maximum includes any one-time installation and equipment charges.</p>	FY 2015																																																											

13	Bundled End-User Equipment	Although not in the Reform Order, the FCC issued an Order in May 2014 ruling that prohibits ineligible end-user equipment from being bundled at no cost with an eligible service. This includes free cellular phones, iPads/tablets, and VOIP phones/equipment. Applicants will be required to perform a cost allocation to remove the value of the ineligible equipment from the pre-discount price claimed for the annual service costs. Previously-signed contracts for such equipment bundles are not grandfathered.	FY 2015
CONSORTIA-RELATED CHANGES			
14	Discount Calculations	As noted above, each school district member's discount will be calculated using the new district wide methodology of dividing the total number of NSLP students by the total number of enrolled students in the district and correlating this percentage to the E-rate discount matrix. Consortia members' discounts will continue to be averaged using a simple average to arrive at the consortium wide E-rate discount percentage.	FY 2015
15	Clarification on Member Discount Requirement	Each consortium member is required to receive the benefit of the individual member's E-rate discount unless it's not feasible to do so for shared services.	Immediately
16	Priority of Application Processing	State and regional consortium applications for broadband services will be prioritized for processing and this will reverse the historic trend of late review and funding of these applications.	FY 2014
17	Letters of Agency	The LOAs requirement has been expanded to now require signed LOAs from all consortium members prior to posting a Form 470. Previously, the rules only required LOAs to be signed prior to submitting the consortium Form 471.	FY 2015
CATEGORY 2 CHANGES			
18	Priority 2 Name Change	Traditional Priority 2 will be called Category 2 and will be focused on Wi-Fi and related infrastructure/equipment. Category 1 services will be funded first before Category 2 equipment and services are funded in order to ensure there is enough funding available to cover all Category 1 funding requests.	FY 2015
19	National Funding Amounts	A minimum of \$1 billion/year will be targeted to Category 2 funding. Should available funding remain after funding all C1 requests, that funding can be allocated to meet C2 demand.	FY 2015

20	Category 2 Discount Matrix	<p>The maximum Category 2 discount will change from 90% to 85%. All other discount bands will remain the same. Should not enough funding be available to cover an entire discount band, pro-ration will be applied using the NSLP percentage (100% NSLP funded first, then 99%, 88%, etc.). The new Category 2 discount matrix:</p> <table border="1" data-bbox="753 293 1257 570"> <thead> <tr> <th>NSLP Eligibility</th> <th>Urban</th> <th>Rural</th> </tr> </thead> <tbody> <tr> <td>Less than 1%</td> <td>20%</td> <td>25%</td> </tr> <tr> <td>1 – 19%</td> <td>40%</td> <td>50%</td> </tr> <tr> <td>20 – 34%</td> <td>50%</td> <td>60%</td> </tr> <tr> <td>35 – 49%</td> <td>60%</td> <td>70%</td> </tr> <tr> <td>50 – 74%</td> <td>80%</td> <td>80%</td> </tr> <tr> <td>75 – 100%</td> <td>85%</td> <td>85%</td> </tr> </tbody> </table>	NSLP Eligibility	Urban	Rural	Less than 1%	20%	25%	1 – 19%	40%	50%	20 – 34%	50%	60%	35 – 49%	60%	70%	50 – 74%	80%	80%	75 – 100%	85%	85%	FY 2015
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21	Category 2 Funding Allocations (Budgets)	<p>Each school building will be permitted to apply for a pre-discount cap of \$150 per student, or a minimum building cap of \$9200, over a rolling five year basis.</p> <p>Each library building will be permitted to apply for a pre-discount cap of \$2.30 per square foot or a minimum building cap of \$920, over a rolling five-year basis. Square footage shall include areas off-limits to the public.</p> <p>Money is allocated per building (not on a district-wide basis), and applicants cannot move funding from one school to another. Funding may be requested over 5 years, or applied for in a single year. Funding, however, will be subject to availability each year.</p> <p>If an applicant receives less than the maximum budget available for a school or library in a single year, the applicant may request the remaining balance in a school’s or library’s C2 budget in subsequent funding years of a five-year cycle. Committed, but unspent, funding cannot be returned and used in a subsequent funding year.</p> <p>There is no look-back provision for applicants funded in years prior to FY 2015.</p> <p>All competitive bidding requirements will continue to apply and applicants can only apply for what they need except for possible Preferred Master Contracts for C2 (see below).</p> <p>Non-Instructional Facilities are not eligible for equipment unless the NIF has classrooms or the NIF houses the WAN/WLAN central equipment (such as the network operations center). In such cases of NOCs, applicants will be required to allocate a portion of each school’s \$150 budget toward the purchase of such equipment.</p> <p>New schools may estimate the number of students who will be attending the new school and seek funding based on that estimate. However, if an applicant overestimates the number of students who enroll in that school, it must return to USAC by the end of the next funding year any excess funding based on the actual number of enrolled students.</p> <p>Students who attend multiple schools, such as those that attend IUs or CTCs part-time, may be counted by both schools in order to ensure appropriate LAN/WLAN deployment for both buildings.</p> <p>After 2 years, the per-pupil/per building/per square foot formula will be reviewed and sunsets unless specific action is taken by the FCC to extend it.</p>	FY 2015																					

22	Category 2 Service/Equipment – Permanently Eligible	<p>The following equipment and services needed to distribute broadband to students and library patrons will be <u>eligible</u> beginning in FY 2015:</p> <p>Routers, switches, wireless access points, internal cabling, racks, wireless controller systems, firewall services, uninterruptable power supply equipment and software that supports eligible equipment, and installation of eligible equipment. Cloud-based functionality of this equipment, such as cloud-based wireless controllers, also is eligible.</p>	FY 2015 and beyond (no sunset)
23	Category 2 Service/Equipment – Short Term Eligible	<p>Caching functionality, as well as the necessary software or equipment, such as caching servers, will be <u>eligible</u> in FY 2015 and FY 2016.*</p> <p>Managed Internal Broadband Services (MIBS) (including managed Wi-Fi) which cover the operation, management, or monitoring of a LAN or WLAN are eligible in FY 2015 and FY 2016.* Under such managed service contracts, schools and libraries can either 1) obtain LANs/WLANs as a service typically for a period of three to five years from a third party who manages the entire system, providing operations and maintenance for the life of the contract; or, 2) own the equipment, but have a third party manage it for them. Eligible managed Wi-Fi expenses include the management, operation, and/or monitoring of the LAN/WLAN, including installation, activation, and initial configuration of eligible components, and on-site training on the use of eligible equipment. Eligible managed Wi-Fi expenses do not include a managed voice service, for example.</p> <p>Basic Maintenance Services for eligible equipment will be eligible in FY 2015 and FY 2016.* A service is eligible for support as a “basic maintenance” service if, but for the maintenance at issue, the internal connection would not function and serve its intended purpose with the degree of reliability ordinarily provided in the marketplace to entities receiving such services.</p> <p>Pre-discount costs for MIBS, Maintenance, and Caching Services will be eligible up to the \$30 per student per year or one-fifth of the budget available to libraries based on floor area over a five-year period.</p> <p><i>* The FCC will evaluate the benefits and drawbacks of these eligibility determinations in future funding years. Unless the FCC extends the eligibility of these services, beginning in FY 2017, the only applicants that will be eligible for E-rate funding will be those that received E-rate funding in FY 2015 and/or FY 2016 and that are operating under a five-year applicant budget.</i></p>	FY 2015 and FY 2016 only unless on 5 year budget plan
24	Category 2 Service/Equipment Eligibility – Not Eligible	<p>The following equipment/components will be <u>ineligible</u> beginning in FY 2015:</p> <p>Circuit cards, interfaces, gateways, antennas, servers, software, storage devices, voice components and video components (including VOIP equipment), virtual private networks, and most the data protection components (exceptions are firewalls and uninterruptible power supply/battery backup).</p>	FY 2015
25	Category 2 Early Installation	<p>Eligible equipment may be purchased and/or installed on or after April 1 prior to the beginning of the funding year to allow maximum amount of time during the summer to complete the necessary work. Disbursements will not be made until on or after July 1.</p>	FY 2015

26	Preferred Master Contracts – P2	The FCC staff is empowered to designate certain equipment contracts that offer excellent nationwide pricing as Preferred Master Contracts (PMC) and may allow such contracts to be exempted from the Form 470 competitive bidding requirement and/or require applicants to include the preferred master contract in their bid evaluations even if the PMC is not submitted as a bid in response to the applicant's Form 470. The designation of a Preferred Master Contract must be reevaluated every two years.	FY 2015
27	Technology Plans	The technology plan requirement as a pre-requisite of receiving E-rate P2 (now C2) funding has been repealed. There will be no requirement for Priority 1 funding requests as well.	FY 2015
INVOICING CHANGES			
28	Invoicing Deadlines	One automatic 120 day invoice deadline extension will be granted if the request is made on or before the original invoice deadline (which is typically October 28 following the funding year). Late invoice deadline extension requests will not be granted by USAC and must be requested via a waiver request to the FCC. The FCC will no longer be generous with granting such requests and applicants will need to show truly extraordinary circumstances to justify a waiver. Unused funds will be able to be de-obligated more quickly to be used to make other funding commitments.	Immediately – All invoices for all funding years
29	Direct Invoicing	Applicants can submit BEARs directly to USAC without requiring service provider approval and USAC will send funds directly to applicants using electronic funds transfer. Applicants will need to provide bank account information to USAC in order set up electronic funds transfer arrangements. Payments will be made only to schools and libraries and not to consultants.	FY 2016
FORMS, DOCUMENT RETENTION, APPEALS			
30	Signed Contract Requirement	If a signed contract cannot be obtained prior to submitting the Form 471, USAC will consider other legally binding agreements. In determining whether a legally binding agreement is in place, USAC will consider the existence of a written offer from the service provider containing all the material terms and conditions and a written acceptance (including an e-mail) of that offer from the school or library as evidence of the existence of a legally binding agreement. A verbal offer and/or acceptance will not be considered evidence of the existence of a legally binding agreement.	FY 2015
31	Electronic Form Filing	All forms submitted to USAC and all notifications sent by USAC will be required to be filed electronically as of Funding Year 2017. Some but not all forms may be required to be electronically submitted in 2015 and 2016.	FY 2017
32	Document Retention	The document retention requirement has been expanded from 5 years to 10 years from the last date to receive service or service delivery deadline, whichever is later.	FY 2015
33	Multi-Year Contract Application Streamlining	Multi-year contracts with a term of five or less years will have a streamlined review in the subsequent funding years after the contract has been initially subject to a full PIA review. The funding request must be for the same services but may include changes to services that are permitted under the establishing form 470 and contract. Applicants will only need to provide basic information identifying the applicant, confirm that the FRN is a continuation of a FRN from a previous year	FY 2015

		based on a multi-year contract, and identify and explain any changes to their application such as changes in the discount rate, the membership of a consortium or the services ordered. Applicants will still be required to submit the funding request each year of the contract and funding commitments will be made year-by-year.	
34	Data Collection	<p>The Form 471 will be modified to require applicants to report information to measure progress toward meeting connectivity goals. The Order is not specific but it appears that WAN circuit information will be required per building and possibly per circuit. All data collected will be made publicly available.</p> <p>FCC also will work with schools and libraries to develop network measurement methods to gather data on network usage and performance, and to work with USAC to develop best practices and benchmarks regarding network utilization, network architectures, network performance, network optimization and management.</p>	FY 2015
35	Pricing Transparency	Item 21 information will be standardized to provide meaningful information that is easy to compare across applicants and will be made public in electronic format in bulk data files and/or through publicly available application processing interfaces. Such information will be considered non-confidential unless an applicant can certify that the disclosure of price information violates a statute, regulation or court order. All Item 21 collected data will Contracts cannot contain prohibitions against disclosure of price information; any such restrictions will not be honored for E-rate purposes.	FY 2015
36	Appeals	All appeals, except for requests of waiver of FCC rules, must first be filed with USAC. Requests for rule waivers should continue to be filed directly with the FCC because USAC does not have authority to waive FCC rules.	Immediately
CONNECTIVITY GOALS			
37	Internet Access Goals	<p>Schools: Internet access of at least 100 Mbps per 1,000 students and staff (users) in the short term and 1 Gbps Internet access per 1,000 users in the long term. Measurement will be at the district level for school districts and school level for schools that are not part of a district.</p> <p>Libraries: Internet access for libraries that serve fewer than 50,000 people of at least 100 Mbps and at least 1 Gbps for libraries that serve 50,000 people or more.</p>	FY 2015
38	WAN Connectivity Goals	<p>Schools: Dedicated data service <i>scalable</i> to 10 Gbps per 1,000 students in the long term. FCC assumes that in most cases, a 1 Gbps fiber connection can be readily scaled to 10 Gbps with upgraded networking equipment.</p> <p>Libraries: If libraries are connected by a WAN, the measure will be the total number of libraries that have a connection capable of providing a data service scalable to at least 10 Gbps.</p> <p>There are no short term WAN connectivity goals.</p>	FY 2015
39	Internal Connections Goals	No goals set at this time because more information is need. FCC staff will conduct a survey of schools and libraries to determine the sufficiency of their LAN/WLAN capacity and coverage and the specific goal will be developed at a later time.	

CLARIFICATIONS, ETC			
40	Lowest Corresponding Price	In order to ensure prices paid for E-rate services and equipment are as low as possible, service providers are required to offer in their bids their lowest corresponding price (LCP) and to charge applicants the LCP for such services and equipment. LCP is the price charged to non-residential customers who are similarly situated to a particular school, library, rural health care provider or consortium that purchase directly from the service provider. Applicants are encouraged to verify that the service provider's bid complies with the LCP requirement and service providers are obliged to ensure that the price charged to applicants complies with LCP. FCC's Enforcement Bureau intends to increase LCP enforcement.	Immediately
41	Audits	Order clarifies that under present rules, applicants are required to allow auditors, investigators, attorneys or any other person appointed by a state education department, USAC, the Commission or any local, state or federal agency with jurisdiction over the entity on-site to conduct E-rate compliance inspections.	Immediately
42	USAC Efficiencies	<p>USAC will try to issue all FCDLs for workable FRNs by September 1st of each funding year. Workable FRN means that all information has been submitted, and there is no investigation or audit of the applicant, service provider or consultant associated with the FRN.</p> <p>USAC also will overhaul their IT systems (long term project) including the creation of an online portal with pre-populated information for forms completion. The new IT systems will enable electronic access to non-confidential information including both forms information and supporting documentation submitted to USAC in a format that can be used with application programming interfaces (APIs). Open source code will be shared where feasible which would allow third-party systems to directly enter application data.</p> <p>USAC has been directed to follow federal guidelines for plain language communications in a simple, direct, and user-friendly manner and conduct a plain language review of all commonly used correspondence.</p>	<p>FY 2015</p> <p>FY 2015 – FY 2017</p> <p>FY 2015/FY 2016</p>
FURTHER NOTICE OF PROPOSED RULE MAKING			
43	FNPRM	<p>The FCC also released a Further Notice of Proposed Rule Making (FNPRM), seeking comments on several additional issues:</p> <ol style="list-style-type: none"> 1) Should the funding cap should be increased? 2) Should multi-year contracts be limited to five years (including extensions) except for contracts that require large capital investments to install new facilities expected to have a useful life of 20 years or more? 3) Should applicants be required to use the same NSLP data reported to the State on their Form 471 applications? 4) Should applicants that participate in NSLP be required to use that information to calculate their discounts and no longer be able to use alternative measures such as income surveys? 5) Should consortium discounts be computed as a weighted average rather than a simple average of the members' discounts and each member should receive the benefit of the member's individual E-rate discount? 6) Should consortium be required to consider master contract pricing? 7) Should consortium receive an additional discount of 5% and should there be a specific definition for consortium in order to qualify for the additional discount? 8) Should private sector parties be permitted to join E-rate consortium? 9) Should the library budget for P2 be changed from \$2.30 per square foot to another metric? 	<p>Initial Comments due 9/15/14</p> <p>Replies to Comments due 9/30/14</p>

