

But First, Let's Clean Up FY 2017



***BEAR Invoice Deadlines
Invoice Deadline Extension Requests (IDERs)
BEAR PINs
Late Form 486s***

FY 2017 BEAR Deadline



- Monday, October 29, 2018 is the deadline to submit a BEAR for FY 2017 recurring services
 - October 28 falls on a Sunday
- Monday, October 29, 2018 is also the deadline to request an extension (IDER) for recurring services
 - **No exceptions** (ask anyone who missed the deadline last year and appealed to the FCC)
 - Single, 120-day extension will be granted
- Request an Extension NOW if...
 1. You haven't yet submitted your FY 2017 BEAR
 2. You submitted a FY 2017 BEAR but it is "in review"
 3. You don't have a BEAR PIN
 4. You have not filed a BEAR since July 2015 and do not yet have your Form 498 (Direct Deposit Form) approved by USAC
 - This form is only required to be submitted once, not annually*
 5. You have a FY 2017 appeal, SPIN change, or SS pending

* *January 28, 2019 is deadline to submit BEAR for FY 2017 non-recurring services (internal connections)*

New Method to Request IDERs

- USAC has just announced that all invoice deadline extension requests (IDERs) now **must** be submitted within EPC
 - IDER requests previously were submitted in the BEAR invoice system, or using a Customer Service Case
 - If you previously requested/received an extension, you do not have to resubmit it using the new tool
- Multiple FRNs may be submitted at the same time, and the approvals (if eligible) are shown instantly
- Users submitting the request must have full or partial rights in EPC for that entity (cannot be view-only)
- Tool is easy to use, but does require a 2-step process that first checks the FRN for extension eligibility and then requires the applicant to submit the request to receive the extension request decision
 - Be sure not to forget this second step

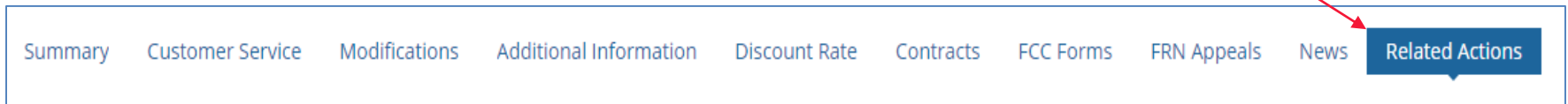
I encourage everyone to submit their BEARs by the Oct 29 deadline because so many people who receive an extension then forget to file the BEAR!

Finding the New IDER Tool

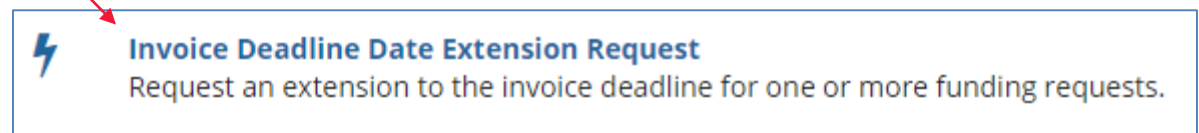
1) From your EPC Landing Page, click on your School or Library's Name under the USAC Logo



2) Select Related Actions from the top toolbar



3) Scroll to the bottom of the list, and select Invoice Deadline Extension Request



Enter FRN(s) to Check Eligibility

Request an extension: Invoice Deadline Date

Funding Request Number(s) for extension

List one or more funding request numbers (FRN) below to check its eligibility for an extension to the Invoice Deadline Date.

1799009716 	List FRNs here. Multiple FRNs may be submitted, if they are separated by commas
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589/600 characters remaining

Note: Each FRN must be separated by a comma.

CANCEL

Click 'Check Eligibility'



CHECK ELIGIBILITY

Be Sure to Submit!

Request an extension: Invoice Deadline Date

Funding Request Numbers Eligible for Extension

The funding request numbers listed below are eligible for an Invoice Deadline Date extension.

The request must still be submitted and approved by USAC before an extension can be granted. To edit your list of FRNs, use the Back button at the bottom of this screen.

<input type="checkbox"/>	Funding Request Number	↑	FRN Nickname	Current Service Delivery Deadline	Current Invoice Deadline Date	BEN	SPIN
<input type="checkbox"/>	1799009716		Lit Fiber WAN - Comcast	6/30/2018	10/29/2018	125991	143003990

REMOVE

Funding Request Numbers Ineligible for Extension

The funding request number(s) listed below are not eligible for an Invoice Deadline Date extension. For more information, please review the Reason for Ineligibility.

Funding Request Number	↑	FRN Nickname	Reason for Ineligibility	Invoice Deadline Date	Service Delivery Deadline	BEN	SPIN
No items available							

Note: Only eligible FRNs will be submitted for an extension. To edit your list of FRNs, use the Back button below.

CANCEL

BACK

Assuming you are eligible to submit the IDER request, and the deadline has not yet passed, click **SUBMIT** to submit the request to USAC

SUBMIT

IDER Approval Page

System will show new BEAR Invoice Deadline. Be sure not to miss this deadline because no further extensions can be requested.

Approved for an IDD extension
The funding request number(s) listed below have been approved for an extension to the Invoice Deadline Date

Funding Request Number	FRN Nickname	Original Invoice Deadline Date	Extended Invoice Deadline Date	Service Delivery Deadline	BEN	SPIN
1799009716	Lit Fiber WAN - Comcast	10/29/2018	2/26/2019	6/30/2018	125991	143003990

- USAC will also issue several additional notifications of this decision:
 - An e-mail confirmation, with attached spreadsheet, will be sent to the person who submitted the IDER request
 - A News item will be posted in the entity’s EPC portal
 - A Notification will be listed in the Notifications section of the entity’s EPC Landing Page

How to Request BEAR PIN

- All BEARs must be submitted online
 - Paper BEARs can no longer be submitted
 - Must be filed in “old” BEAR system:
<http://www.sl.universalservice.org/menu.asp>
- PIN needed to log-in to Online BEAR
 - PIN is not your EPC Password
- If you had a PIN but can't find it, call CSB at 888-203-8100 and they will regenerate it
- If you don't have a PIN, you must complete a simple template and submit to USAC
 - Template available at:
<http://www.usac.org/res/documents/sl/xls/PIN-request-template.xlsx>
 - Submit in EPC or using 'Submit a Question' feature
 - BEAR PIN will be e-mailed within a week
- **If you don't yet have a BEAR PIN, request an IDER!!!**



Not Too Late to File Form 486s

- Form 486 Deadline is 120 days from FCDL or Service Start Date, whichever is later
- If you miss this deadline, USAC will issue a “reminder” letter in EPC, giving you an additional 15 days to submit
- If you still file late, USAC will deduct 1 days worth of funding by adjusting the Service Start Date to 120 days prior to the date the 486 was filed
- USAC now has the discretion to approve late-filed Form 486 appeals as long as these two conditions are met:
 - The Form 486s were filed no later than 120 days after the last date to receive service in the funding year (for FY 2017 recurring services, this date would be October 28, 2018);
and
 - Where applicants have demonstrated good cause for the late filing (such as where the circumstances were beyond their control)
- 33 PA entities still haven’t filed their FY 2017 Form 486s
 - Message sent to the listserve on 10/12/2018 with further instructions

And Let's Review FY 2018



*Status of FY 2018 FCDLs
Missing Form 486s
C1 and C2 Reminders*

Status of PA FY 2018 FCDLs

- 2814 FRNs submitted
 - \$52 million committed thus far
 - \$18.6 funded for Category 2
 - 64 FRNs still “pending” for 34 entities
 - Requesting about \$9 million
 - All but 6 of the pending FRNs are for Category 1
 - And most of those are for FRNs with fiber requests
- By comparison, in FY 2017:
 - \$62 million committed, of which \$3.3 was for voice
 - \$23.7 funded for Category 2

FY 2018 Form 486s

- If you have been funded for FY 2018, don't forget to file your Form 486 to "turn-on funding"
- A "486-Due List" was sent to the listserve on Oct. 14
 - 91 PA entities affected
- You must wait until you receive an FCDL to file the 486
 - Deadline is 120 days after FCDL date
- VERY easy form to file in EPC (click, click, click)
 - Guide at: <http://e-ratepa.org/?p=25591>
 - **Be careful when clicking on CIPA certifications**
 - These toggle instead of staying checked!

Reminders:

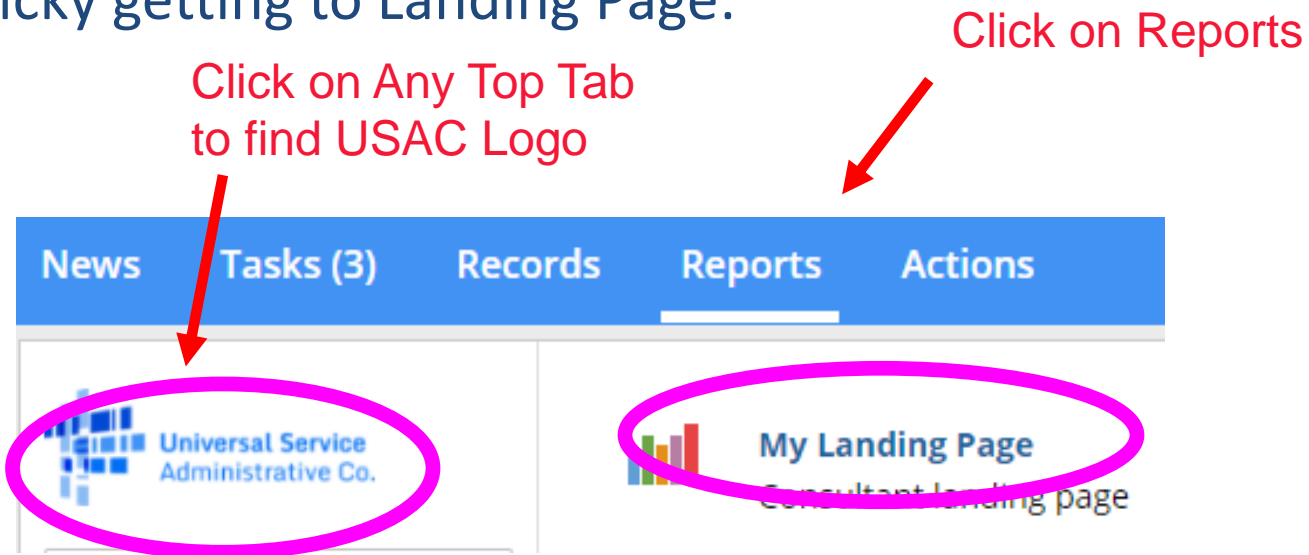
- **Category 1:**
 - Contact vendors to request discounted bills, if desired
 - And then check the invoices to be sure the invoices are receiving discounts – at the appropriate rate
- **Category 2:**
 - If you've received C2 funding:
 - Label equipment
 - Track equipment in asset inventory
 - File Form 500 to “decommit” C2 funding if not using entire commitment
 - This ensures the funding is available to be used in a future year

Time to Focus on FY 2019!



EPC Update

- EPC system doesn't appear to be going away anytime soon
- System "bug" fixes are slowly being deployed
- No plans to move BEARs into EPC
- Tricky getting to Landing Page:



FY 2019 Administrative Window

- **“Admin” Window**

- Special window prior to Form 471 Application Window where schools and libraries update their entities’ data
 - Add/remove entities (must contact CSB to do this)
 - Update enrollment and NSLP/CEP data for each school
 - Libraries update their square footage data, if there have been changes
- Data is then be “locked down” and Form 471 application window will open
- Admin Window is open now!
 - Will likely close around January 7

FY 2019 Administrative Window

- **What enrollment/NSLP data to use?**
 - Use data submitted by your food service dept in the PEARS system in October 2018
 - This is the data that PIA uses during their validation process
 - Official PDE NSLP Data will not be available until after the Admin Window closes, but....
 - **Just like last year, PDE has agreed to provide us with the “draft” data submitted by schools**
 - I will format and send to the listserve by mid-December
 - Encourage you to wait for this data - OR
 - You can ask your food service director for the data they have or will submit to PDE in the PEARS system for October 2018
 - *Can submit a Form 471 RAL Correction to update discount data after Form 471 is submitted, but it may delay review of your application*

FY 2019 Form 471 Application Window

- 471 Window deadline guess?
January 10 – March 20
- Recommended timeline:
 - NOVEMBER: File all Form 470s by Thanksgiving
 - DECEMBER: Vendor bids submitted
 - JANUARY: Bid evaluation, board agenda submission
 - Issue PEPPM Mini-Bids
 - FEBRUARY: School board approval, sign contracts
 - MARCH: File Form 471
- **Form 470s being accepted in EPC NOW**
 - Don't wait until January to file 470s

FY 2019 Eligible Services

- Final ESL not yet released by the FCC
- But draft ESL contained almost no changes
- Voice is completely phased out



Reinstatement of Amortization Requirement

- Prior to FY 2015, network installation/build out costs (not called Special Construction Charges) exceeding \$500,000 were required to be amortized over at least 3 years
- FCC “suspended” this requirement from FY 2015 – FY 2018 and allowed applicants to request/recover 100% of eligible charges with no amortization requirement
- FCC has **not** extended this suspension, and thus the \$500,000+ amortization requirement will return in FY 2019
 - Have expressed concern to the FCC about this issue
 - If this impacts your procurements, I encourage you to write to the FCC
- Applicants are still allowed to amortize, up to 4 years, THEIR SHARE of the special construction charges
 - ***For example, if there is a \$1m SC Charge with 60% E-rate discount:***
 - ***Applicant may request to pay vendor \$100,000/year for 4 years to pay off non-discounted amount of SC charge***
 - ***However, applicant must request the other \$600,000 from USAC over 3 years***

Form 470 Changes – Internet Access

- Last year there was great confusion over how to file for Internet Access
 - FCC granted a hold harmless for FY 2018 because so many applicants were confused and did not complete the 470 accurately
- For FY 2019, the 470 drop down options have *slightly* changed
 - If you are seeking Internet Access delivered via fiber, you must select “**Leased Lit Fiber (with or without Internet Access)**” and then explain in the narrative box that you are seeking Internet Access
 - If you are seeking Internet Access delivered via any other transport mode (such as cable modem, dsl, etc.) you must select “Internet and Transport Bundled”

C1 Drop Down Menu in Form 470

FCC Form 470 - Funding Year 2019

Lawrence School District - Lawrence SD FY 2019 470 for C1 and C2 - Form #190000072

Last Saved: 9/1/2018 3:44 PM EDT

Basic Information

Service Requests

Technical Contact Information

Procurement Information

FCC Form 470 Review

Certifications & Signature

Please select the option below that matches the services for which you are seeking bids.

Add New Service Request

Function *

Please select a value

Please select a value

Leased Lit Fiber (with or without Internet Access)

Internet Access and Transport Bundled (Non-Fiber)

Transport Only - No ISP Service Included (Non-Fiber)

Internet Access: ISP Service Only (No Transport Circuit Included)

Leased Dark Fiber and Leased Lit Fiber

Self-Provisioned Network (Applicant Owned and Operated Network) and Services Provided Over Third-Party Networks

Network Equipment

Maintenance & Operations

Cellular Data Plan/Air Card Service

Other

* Select "Other" when the service you want is not otherwise listed. Be sure to provide additional details about this service by uploading an RFP document.

CANCEL

ADD

Category 1 Drop Down Cheat Sheet

If you want...	Select this 470 Drop Down Option	RFP Required?
Leased Lit Fiber Connectivity	Leased Lit Fiber (with or without Internet Access) Must explain service request in narrative text box	No
Leased Dark Fiber Connectivity	Leased Dark Fiber and Leased Lit Fiber Also must state minimum and maximum capacity needs in the narrative text box plus # of leased lit fiber circuits being requested. EPC will prompt you to specify # of leased dark fiber strands being requested.	YES
Self Provisioned Fiber (Applicant owned)	Self-Provisioned Network (Applicant Owned and Operated Network) and Services Provided Over Third-Party Networks	YES
Non-Fiber Connectivity (coaxial cable, microwave, copper, etc.)	Transport Only – No ISP Service (Non-Fiber)	No
Category 1 Network Equipment	Network Equipment	YES
Maintenance and Operations	Maintenance and Operations	YES
Internet Access with FIBER Transport	Leased Lit Fiber (with or without Internet Access) Must explain service request in narrative text box	No
Internet Access with NON-FIBER transport (for example, cable modem, DSL)	Internet Access and Transport Bundled	No
Commodity Internet Access (no transport)	Internet Access: ISP Service Only	No

Form 470 Changes – C1 Network Equipment & M/O

- When seeking Leased Dark Fiber or Self-Provisioned Fiber, the Category 1 network equipment needed to light the fiber, as well as the services needed to maintain those networks are E-rate eligible
- Previously, applicants selected “other” and then explained in the RFP what was being requested
 - For FY 2019, the Form 470 now includes individual drop downs for both C1 Network Equipment and Maintenance/Operation
 - Be careful. These only refer to C1 equipment and M&O – NOT any C2 network equipment or maintenance

Which FRNs Need Rebid for FY 2019?

- On Sept 26, a message was sent to the PA E-rate listserv with:
 - All FY 2018 Recurring Services FRNs, showing:
 - Which FRNs will not be under contract for FY 2019 (or have available extensions) and MUST be rebid
 - Which FRNs are for **MTM** services and must be rebid
 - Which FRNs will still be under contract as of FY 2019 and **do NOT** have to be rebid
- Use this data to help plan for FY 2019!

Category 2 E-rate Budgets

- Each **school** is entitled to a pre-discount cap of \$156.23 per student, or a minimum building cap of \$9,852.23, over 5 years
 - AVTS budgets based on total number of students
 - Not the # of students in the building at any given time
- Each **library** is entitled to a pre-discount cap over 5 years, based on their Locale Code:
 - Urban Libraries (those with locale codes of 11, 12 or 21): \$5.21/sq. ft.
 - Other Libraries: \$2.39/sq. ft.
 - Square footage is the area for all floors occupied by the library, including those areas off-limits to the public
- These C2 multipliers will be adjusted for inflation, likely in February
 - Base your calculations on the FY 2018 amounts shown above

Category 2, 5-Year Budgets

- The “5-Year C2 Cycle” begins the first year *any* school in a district obtains E-rate funding, beginning FY 2015
 - Example, if the first school in a district received C2 funding in FY 2017 (with no other school receiving E-rate C2 funding in FY 2015 or FY 2016), C2 Year 1 for that district would be FY 2017
- What happens after 5-year Budget Plan is over?
 - Unsettled: We *believe* that each school will receive the remainder of their C2 budgets
 - FCC will issue report in January with recommendations about what should happen to C2 for FY 2020 and later
 - Unsure of process after staff report is released
- Rules say that beginning in FY 2020, Basic Maintenance, Managed Internal Broadband Services and Caching are no longer eligible

PA C2 Budget Utilization

- Since FY 2015, PA's schools and libraries have received more than \$104 million in Category 2 funding

Internal Connections	Basic Maintenance	Managed Internal Broadband Services
\$33,509,825.47	\$462,142.85	\$105,770.96
\$27,324,920.00	\$627,885.00	\$123,033.00
\$23,185,174.00	\$314,772.00	\$235,814.00
\$17,682,275.00	\$740,505.00	\$201,144.00

- 125 districts have **50% or more** of their C2 budgets remaining that will expire if not used in FY 2019
 - Of those, 64 haven't used any of their C2 budgets
 - \$36 million at stake

Calculating Remaining C2 Budgets

Formula:

(School Enrollment * \$156.23) – approved pre-discount amounts since FY 2015 = Remaining C2 Budget

- Multiply each school's current enrollment by \$156.23, then **subtract** the pre-discount amount of any C2 E-rate funding used in FY 2015, FY 2016, FY 2017, & FY 2018 for that school or library
- C2 budget is “reduced” at time of commitment, not disbursement
 - If not all committed funding is spent, you can file a Form 500 to return the remaining unused ‘commitment’ to USAC
 - Takes a few weeks for USAC to process
- FY 2019 Inflation Factor will not be announced until Feb/March
 - Presume that your budget is based on \$156.23

Calculating Remaining C2 Budgets

- Use **this tool** on USAC's website under Tools:
<https://sltools.universalservice.org/portal-external/budgetLookup/> -
- Includes all commitments from FY 2015 – FY 2018
 - Does **NOT** update when you change enrollments in EPC profiles
 - Does NOT include pending Form 500's
 - Must do offline math to accurately determine what C2 remains for each school for FY 2019

Requesting More Funding Than Remains in C2 Budget

**Don't Do It.
Ever.
Ever.**

- What happens if you do?
 - Your Form 471 will go into manual PIA review
 - Will be required to identify exactly what FRN line items should be reduced or eliminated to come into budget



Category 2 Bidding Options

- **Nonpublic schools/libraries - simple:**
 - Post 470 only; No RFP required
 - Wait 29 days, conduct bid evaluation, sign contract and submit 471
 - Can consider other factors besides cost
- **PA Public schools:**
 - 2 Options:
 - Post Form 470/RFP
 - ~ or ~
 - Use PA PEPPM Contract

Important Note: PEPPM Mini-bids cannot be issued to vendors before January 2, 2019. New PEPPM contract is being bid and awarded vendors' list won't be available until then.

C2 Bidding Reminders

- ✓ Equipment list **MUST** allow for equivalent manufacturer's products to be bid
 - “Cisco 48-port PoE Switch or equipment that is equivalent in functionality and quality”
 - May include a requirement that equivalent equipment must be fully **interoperable** and compatible with District's existing “XYZ” equipment
- ✓ Binary bid disqualification reasons be stated in the State and Local Procurement Requirements of the Form 470 or in the RFP
 - **DQ reasons must be yes/no (either they complied or they did not)**
- ✓ Include **Prevailing Wage** Determination for all projects involving labor where the total project is over \$25,000 (public schools only)
 - Obtain PW Determination and attach to RFP:
 - <https://www.dliscureweb.pa.gov/PrevWage/Pages/DetermRequest.aspx?ID=&PageType=>

C2 Bidding Reminders

- ✓ All RFP amendments must be uploaded into EPC with original Form 470
 - Includes relevant information given to vendors that would impact bid (FAQs)
 - Restart 28-day clock if “cardinal change” made to RFP (adding equip/services, modifying project scope)
- ✓ All C2 services/equipment must have a signed contract before Form 471 is filed
- ✓ Cannot contact PEPPM bidder ahead of bidding to seek equipment list
- ✓ Put price guarantee length in contract
 - This may help with future price increases due to tariff increases

Category 2 Installation Timeline

- May purchase FY 2019 C2 non-recurring services/equipment from **April 1, 2019 - September 30, 2020**
 - Equipment must be installed before September 30
 - Even if installation isn't included on the FRN
 - Invoices to USAC cannot be submitted prior to July 1
 - **Service Start Date listed on 471, 486 and BEAR cannot be earlier than 7/1/2019**
 - Only make pre-FCDL purchases if you can afford to pay 100% of cost and seek reimbursement later
 - And are willing to assume risk of an E-rate funding denial

C2 Form 471 Filing Reminders

- Apply for Multi-Year Product Licenses in 1st year
 - No need to amortize
- Don't apply for Basic Maintenance Services as Licenses
 - Must amortize
- Ignore the “View Category 2 Budget Information” in the Form 471
- Don't ever apply for more than C2 budget cap for a school
- Have Structured Cabling Contracts be Single Priced
 - By school
- Break Out All Components into Separate FRN Line Items – Including Switches
- Break Out Ineligible Costs
 - Firewalls: Anti-virus, anti-spam, filtering, DDOS features
 - UPS: Network cards
- Sign vendor contracts before submitting 471
- Wisely Allocate C2 Budgets for Shared Equipment
 - Use weighted calculation if it maximizes your C2 budgets

Final Reminders!

- **File FY 2017 BEARs by October 29**
 - Request a BEAR PIN if you don't have one
 - Submit Form 498, direct deposit form, if one hasn't been previously approved
 - **File IDER now** to obtain invoice deadline extension
- File FY 2018 Form 486s after FCDL
 - Must be filed within 120 days
- File FY 2019 Form 470s NOW!
 - Review C1 contracts for expiration dates
 - Determine what schools need C2 equipment
 - And which procurement option to use
- Update enrollment/NSLP in EPC now or wait for PDE data in December

Upcoming E-rate Trainings

- Beginners training – Oct 24 @ IU 15:
 - Register at: <http://e-ratepa.org/?p=27091>
 - PP will be posted on www.e-ratepa.org website
- Upcoming Webinars:
 - Category 2 for Nonpublic Schools/Libraries
 - Category 2 for PA Public Schools



The screenshot shows the homepage of the E-rate in Pennsylvania website. The header features the logo and navigation links for 'What is E-rate' and 'Listserve Archive'. The main navigation menu includes 'DISCOUNT CALCULATIONS', 'TRAINING & OUTREACH', 'E-RATE 2.0', 'PA E-RATE FUNDING ANALYSIS', 'HELPFUL DOCUMENTS', and 'E-RATE FILINGS'. A large banner image displays the text 'Learn About e-rate 2.0' over a background of people using laptops. Below the banner, there are three columns of content: 'Newest Listserv Messages' with several recent announcements, 'Featured' with links to PDE, SLD, E-Rate 2.0, Contact USAC, PA E-Rate Coordinator, and Research Your Funding Request; and 'New to E-rate?' with links to Current Listserv, E-Rate 2.0, Register for Trainings, What is E-rate?, and Sign Up For Our State Listserv. A 'Site tools' section at the bottom right includes icons for social media and a 'More Site Tools' link. The footer contains a repeat of the main navigation menu.

Questions?

