

2nd Form 471 Window - Filing Instructions

Due to the significant number of schools that have needed to increase their on-campus bandwidth to meet educational needs during the pandemic, the FCC has authorized a second FY 2020 Form 471 filing window for Category 1 services. The filing window is open and the deadline to submit a new Form 471 is Friday, October 16, 2020.



This 2nd Window Form 471 Filing Guide is intended to be a roadmap to submitting a compliant and quickly-approved Form 471. Please review the Guide carefully as you begin to file your application.

Form 470 Requirements

- 1) Are schools required to post a new Form 470 if their original contract did not contain the new bandwidth levels and costs?** No, if a Form 470 was cited on a Form 471 that was submitted in the original FY 2020 application window, no additional Form 470 is needed for services upgraded through June 30, 2021.
- 2) Can schools select a different vendor to provide the additional bandwidth if the new vendor can provide the service at a lower price than my current contract?** This question has been posed to USAC and it is still pending. In the absence of “official” guidance, here is my informal advice: Based on the Order, I believe the FCC intended for schools to upgrade through their existing service provider, if possible. If local procurement policies require you to conduct a new procurement, then the Order specifically permits you to file a “Quick 470” and select a second vendor to provide the additional bandwidth. If you use this option, I suggest you obtain a few vendor quotes to prove that the new vendor contract is cost effective. A “Quick 470” means that you don’t have wait 28 days to receive bids.
- 3) Can I file a new Form 471 and purchase on a month-to-month basis?** Yes, but first post a Quick Form 470 and review the bids before filing the Form 471.

Vendor Contracts/Contract Amendments

- If you haven’t already requested a quote from your vendor for the additional circuit and/or Internet bandwidth, please do so as soon as possible because there are reported delays in obtaining vendor quotes.
- If possible, please have new contracts and contract amendments expire June 30 to coincide with the E-rate funding year (and not have them be for 12 months that will go beyond June 30).

- Unless your existing (original) contract contains specific upgrade bandwidth levels and associated costs, be sure to limit the new contract amendment for upgraded service through June 30, **2021** (and not have them be multi-year agreements). Why? Because the Form 470 bidding exemption is only for upgrades through the end of FY 2020 (June 30, 2021). Any upgrades that are signed without a full Form 470, 28-day bidding period will not be considered E-rate eligible for FY 2021. If this happens, you will have to rebid it using the Kalamazoo process and hope your existing vendor remains the most cost-effective solution.
- Be sure to sign the contract or contract amendment prior to submitting the new Form 471.

Key Points to Remember when Filing a New Form 471

1) If you are **upgrading an existing contract**

- Don't create a new Contract Record. Simply reference the original Contract Record in the new FRN, even if the CR does not reflect the services you will be receiving. During their review, USAC staff will likely ask you for a copy of your contract amendment to verify the upgraded bandwidth.
- In the FRN, list the TOTAL amount of bandwidth and the TOTAL costs, not just the incremental amounts. It is highly likely that USAC will simply combine the original FRN and the new FRN to match vendor billing and make USAC invoicing much easier.
- In the narrative box, answer the 11 questions listed below to provide USAC with a complete picture of your funding request (old and new).

2) If you are signing **a contract with a new provider**

- Create a new Contract Record in EPC prior to completing the Form 471. Reference the original Form 470 number (or the new 470 if you posted one), but the new contract signing dates, etc.
- In the FRN, list the amount of the new bandwidth and the new costs as these will be billed separately from your existing service listed on your original Form 471.
- In the narrative box, answer the 11 questions listed below to provide USAC with a complete picture of your funding request (old and new).

Specific Form 471 Filing Guidance

- **File a new Form 471 in EPC.** You will immediately see a screen that says “Your application is being filed after the close of FY 2020 filing window. Therefore, your application will not be considered for funding” and you must seek a waiver from the FCC. This is not true but unfortunately, they didn’t have time to take down that splash screen. Just ignore it and proceed. You will not be required to seek a waiver if you file by October 16, 2020 at 11:59 p.m.
- **Application Nickname:** Please use something like, “COVID 2nd window” or something to be able to distinguish it easily as a 2nd window application.
- **Category of Service:** Select Category 1
- **Creating an FRN:**
 - **Add FRN, then give the FRN a similar nickname like, “COVID 2nd Window Internet”**
 - **Is this FRN a continuation of a previous year?** Select No to move quickly through the application. If you already filed your 2nd window Form 471, and selected yes, it’s ok.
 - **FRN Contract:** Most applicants will select ‘Contract,’ search by your BEN, then select the original Contract Record, and list the Contract Expiration Date.
 - **Fiber Request Key Information:** Select No.
 - **Narrative:** Answer the questions below offline, then paste the **questions and answers** in the narrative box.
- **Creating FRN Line Item(s):**
 - **Adding FRN Line Item:** Click on blue FRN Number hyperlink and then ‘Add a New FRN Line Item’ to provide bandwidth details, costs and recipients of service.
 - **Purpose:**
 - Most applicants are upgrading Internet bandwidth and therefore will select the first option: Internet access service that includes a connection from any applicant site directly to the ISP.
 - Applicants upgrading WAN circuits and NOT Internet will select the second option: Data Connection between two or more sites entirely within the applicant’s network.
 - RWANs (mostly) that are upgrading their bulk Internet purchases (but not the underlying circuit) will select the 4th bullet: Internet access service with no circuit.
 - **Function:** Most applicants will select ‘Fiber.’

- **Type of Connection:** Most applicants will select ‘Ethernet.’
- **Bandwidth Speeds:** List the total bandwidth if amending original contract (original + increase). If signing a new contract, list the bandwidth of the new contract.
- **Connection Information:** Remember, if the answer to one question is Yes, the answer to the other question is No. Most applicants are requesting Internet access funding, and therefore the answers should be answered Yes/No.
- **Cost Calculation:** List the TOTAL monthly cost if amendment the original contract (original + increase). If signing a new contract, list the cost of the new contract only. Also, don’t forget that “monthly quantity” refers to the # of circuits, not the # of months.
- **Recipients of Service:** If requesting Internet funding, select Yes, all entities are receiving service. If upgrading a WAN circuit, select No and then choose the school receiving the upgraded circuit.

Questions and Answers to Include in Your FRN Narrative:

- 1) Original FY 2020 Form 471 #:
- 2) Original FY 2020 FRN #:
- 3) “The discounts requested are for additional bandwidth needed as a result of the COVID-19 pandemic.” *(you must include this statement.)*
- 4) Did you amend an existing contract with the same vendor that was listed on the original FRN, or did you sign a contract with a new vendor?
- 5) Did you increase an existing circuit or add a new circuit?
- 6) Original FY 2020 FRN monthly cost: \$
- 7) Original FY 2020 FRN bandwidth:
- 8) Original FY 2020 FRN Mbps price: \$
- 9) If increasing bandwidth with same vendor, what is new total monthly cost: \$
- 10) If increasing bandwidth with same vendor, what is new total bandwidth (Mbps):
- 11) If increasing bandwidth with same vendor, what is new total Mbps price: \$
- 12) If adding bandwidth with new vendor, what is monthly cost: \$
- 13) If adding bandwidth with new vendor, what is bandwidth amount (Mbps):
- 14) If adding bandwidth with new vendor, what is total Mbps price: \$

15) Are the amounts requested above (costs and bandwidth) the total amount, original plus new costs/bandwidth? Or did you provide just the incremental cost and bandwidth (meaning, just the increase)?

16) Provide any additional information that will help the reviewer understand what is being purchased and requested.

If you have any questions on filing in the 2nd Form 471 Window, please reach out to me!

-- Julie

Julie Tritt Schell
PA E-rate Coordinator
717-730-7133
jtschell@comcast.net
www.e-ratepa.org