

ECF Ex Parte

WC Docket Nos. 21-93 & 21-31
April 21, 2021





SIMPLICITY

Funding Caps

Deadlines

State/Local Procurement

Eligible Equipment

Streamlined Application Form

Applicant and Device Caps

Cost Reasonableness/Fairness

- Applicant-level budget caps provide fair allocation of funding
- Priority given to rural applicants
 - Rural multiplier is 50% higher than urban
- Connected device cap of \$300 each
 - Midpoint of wide range of prices
- Do not insert E-rate discount matrix into calculation
 - Not supported by statute
 - Has no place in ECF
 - Irrelevant when funding is 100% of costs
- SECA proposal is easy to compute, understand & administer
 - Calculation methodology [available](#)

Funding Caps:

Schools:

- Urban: \$100/student
- Rural: \$150/student



Libraries:

- Urban \$2/sq foot
- Rural: \$3/sq foot



Connected Devices:

- \$300/device



Competitive Bidding

- ❑ Do not mandate federal competitive bidding
 - Additional point of failure
 - Additional time required for schools/libraries
 - Most services are commercially available
 - Cannot expect schools to change providers mid-stream
 - Funding & device caps impose cost containment & reasonableness
- ❑ Adopt Telehealth program rationale
- ❑ Rely on state and local procurement compliance certification

Universal Service Administrative Co.
FCC Form 470 - Funding Year 2019
Form 470 Application Number: 19000035
FY2019 FCC Form 470

Billed Entity:
ABC School District
123 Street
Lawrence, KS 66044
785-555-5555
lproctor664@gmail.com
FCC Registration Number: 208

Contact Information:
State School District:
State School District:
321-123-1234

Applicant Type:
Applicant Name: ABC School District
Applicant Address: 123 Street, Lawrence, KS 66044
Applicant Phone: 785-555-5555
Applicant Email: lproctor664@gmail.com

Contract Information:
Contract Number: 1231231234
Contract Start Date: 12/31/2019
Contract End Date: 12/31/2020
Contract Description: Network Equipment

Consulting Firms:
Name: _____
Registration Number: _____
Phone Number: _____
Email: _____

Consultants:
Name: _____
Registration Number: _____
Phone Number: _____
Email: _____

RFI/RFQ:
ID: 219539
Name: RFI/RFQ Network Equipment
219544
RFQ 502_502_502network

Service Type	Function	Other	Quantity	Unit Price	Quantity	Unit Price	Quantity	Unit Price	Quantity	Unit Price	Quantity	Unit Price	Quantity	Unit Price	Quantity	Unit Price
Other Telecommunications	Other Telecommunications	Other Telecommunications	100	100	100	100	100	100	100	100	100	100	100	100	100	100
Other Telecommunications	Other Telecommunications	Other Telecommunications	100	100	100	100	100	100	100	100	100	100	100	100	100	100
Other Telecommunications	Other Telecommunications	Other Telecommunications	100	100	100	100	100	100	100	100	100	100	100	100	100	100
Other Telecommunications	Other Telecommunications	Other Telecommunications	100	100	100	100	100	100	100	100	100	100	100	100	100	100
Other Telecommunications	Other Telecommunications	Other Telecommunications	100	100	100	100	100	100	100	100	100	100	100	100	100	100

Description of Other Functions:
ID: _____
Name: _____

Narrative:
Evaluation factors (weight):
Price of eligible products and services (40); prior experience including past performance (20); personal qualifications (20); environmental objectives (20)
Disqualifying factors: _____

Streamlined Application

- ❑ Collect essential information only
 - Resist temptation to require detailed make/model and bandwidth questions
 - SECA has ECF Form 471 mock-up for consideration
- ❑ Include CIPA certification, if required, and omit Form 486 *
- ❑ Upload cost verification documentation *
 - PO
 - Supplier invoice
 - Contract
 - Supplier/online quote
 - State contract pricing page
- ❑ Pre-funding reviews should be streamlined like Telehealth program
 - Denials/reductions limited to ineligible equipment/service and funding cap restrictions
- ❑ Limit requirement for post commitment changes

** Can be used as a model for regular E-rate program*

Eligible Services/Equipment

- ❑ Related network equipment to deliver services to connected devices should be eligible
 - Consistent with current interpretation of statutory language of Section 254(h)(2)(A)
 - For example, antennas

- ❑ Waive E-rate off-campus Internet prohibition for the benefit of students and teachers
 - Absent waiver, needless burden on ECF program to pay additional connectivity costs
 - Waste of unused E-rate-discounted Internet access

Filing/Processing Deadlines

- ❑ Open single filing window for both retrospective & prospective funding
 - Makes level playing field between previous and future purchases
- ❑ Open window 7/1 and close 9/30
- ❑ Process applications/commit funding as received
 - Budget caps ensure commitments within \$7 billion ceiling
 - If funding remains, open second filing window
- ❑ Ensure that no existing USAC SLD staff or contractors (CSB, PIA or Invoicing) are used for ECF so as to not impact the regular E-rate program