

# What's New with E-rate: New and Pending Services and Comments

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# Overview

- Rule Changes and Other Updates:
  - E-rate Invoicing Moved to EPC
  - New Rules for Tribal Libraries and Others
  - E-rate Support for Wi-Fi on Buses
- Under Consideration:
  - E-rate Support for Lending Wi-Fi Hotspots Off-Campus
  - E-rate Support for Cybersecurity Pilot Program
- Other Reminders:
  - Category 2 Budgets
  - Funding Year 2024 Application Timeline

# E-rate Invoicing Moved into EPC

- E-Rate Systems Consolidation Completed November 7, 2023
- Invoicing for Funding Years 2016 and forward will now be completed in EPC, including submitting and certifying invoice-related forms (FCC Forms 472 (BEAR), 473 (SPAC), and 474 (SPI and eSPI)), responding to inquiries, receiving notifications, and tracking your invoicing activities.
- Invoicing access for applicants will be based on user access rights in EPC.
- We encourage Applicants to review and update your organization's users and current permission levels for invoicing and other post-commitment requests.
- [USAC Guide for Account Administrators](#)

# New Rules for Tribal Libraries & Others

- FCC [released order July 21, 2023](#) - made changes to provide Tribal libraries and other E-Rate participants with greater access to the E-rate program.
  - Tribal definitions: Tribal schools and libraries are defined for E-rate purposes
    - Tribal libraries have maximum C2 discount of 90% and minimum 5-year C2 budget of \$55,000
  - Enhanced Training for Tribal Entities
  - \$3,600 Category 2 bidding exemption for libraries
  - No cost allocation needed for 10% ineligible Internet use (i.e., safe harbor)
  - Repeal of C2 NIF cost allocation requirement for shared equipment
  - Full eligibility for data network cabling
  - Rural Urban updates from 2020 US Census

# \$3,600 C2 Bidding Exemption for Libraries

- Beginning in FY2024, libraries have a Category 2 Form 470 bidding exemption when the total pre-discount price is \$3,600 or less per library per funding year.
- The cost cannot average across a number of libraries and signed contracts are still required prior to filing the Form 471.
- For example, if a library system requests Category 2 support for 3 libraries, the amount of funding for each library must be \$3,600 or less to be eligible for this exemption from filing the Form 470.
- Schools are not included in this exemption.

# 10% Ineligible Internet Usage Safe Harbor

- Beginning immediately, a 10% ineligible usage safe harbor for all applicants is established which says that cost allocation is not required when ineligible usage of Internet is limited to 10% or less of total usage.
  - i.e. Schools that operate child-care, health care centers, vocational and technical classes, etc. no longer have to worry about whether a nominal amount of their Internet usage is being used for technically ineligible purposes.
- The FCC emphasized that applicants are still required to select the most cost-effective Internet service offering to meet its needs, may seek E-rate funding only the amount of bandwidth needed for eligible use.

# Repeal of C2 NIF Cost Allocation Requirement for Shared Equipment

- Beginning immediately, applicants are not required to cost-allocate the non-instructional facility (NIF) usage of a shared piece of equipment that is located in a NIF.
  - i.e. a district switch or wireless controller located in an administrative building or data center
- Note: Category 2 equipment that is solely used by the NIF will continue to be ineligible (for example, WAPs in admin buildings)

# Full Eligibility for Data Network Cabling

- The FCC has clarified that structured cabling in a school or library may be connected to ineligible equipment such as security cameras, voice equipment, smoke detectors, etc. As long as local area network is primarily serving an eligible purpose (i.e., distributing broadband throughout a school or library building), the full cost of the cabling is eligible.
- Note: Networks that are dedicated to an ineligible purpose, such as security networks or voice networks, remain ineligible.



# Rural Urban Updates from 2020 US Census

- USAC updated the Urban/Rural designations in EPC profiles to reflect the the 2020 US Census data.
- USAC notified applicants directly if their discount rate increased or decreased.
- This change only impacted 21 Wisconsin applicants, only 4 applicants had their discount rate decrease by 10%, all others went up by 10%

# E-rate Support For Wi-Fi on Buses

- In Oct. FCC issued Notice saying the 2024 ESL will "Explicitly cover mobile broadband connectivity for school buses...."
  - In Nov. [DPI filed comments](#) with FCC in support
- On Dec. 15 the [FCC released the 2024 ESL](#) which has basic info on applying for WI-Fi on school buses
- E-rate Special Newsbrief - [How to Apply for Wi-Fi on School Buses in FY2024](#)
- Bus connectivity is C1 eligible, including needed equipment (e.g., antennas, routers, modems) and installation fees
- Most other E-rate rules apply (e.g., bidding and evaluation rules)

# E-rate Support for Lending Wi-Fi Hotspots Off-Campus

- Intended to replace expiring ECF
- In Nov. FCC issued Notice seeking comments (due Jan. 16)
- Most proposed rules are same as ECF, but
  - No funding of end user devices
  - Reimbursement based on E-rate discount
- Eligibility not likely for FY 2024, unless FCC opens separate filing window

# E-rate Support For Cybersecurity Pilot Program

- In Nov. FCC issued Notice seeking comments (due Jan. 29)
- Proposes 3-year, \$200 million pilot to:
  - Improve network security
  - Determine costs for network security tools
  - Determine how to leverage other, non-E-rate, funds
- Application process likely open later in 2024
  - Will not follow E-rate application timeframe
- Many organizations pressed FCC to make cybersecurity tools eligible
  - The need is obvious, thus why a pilot?

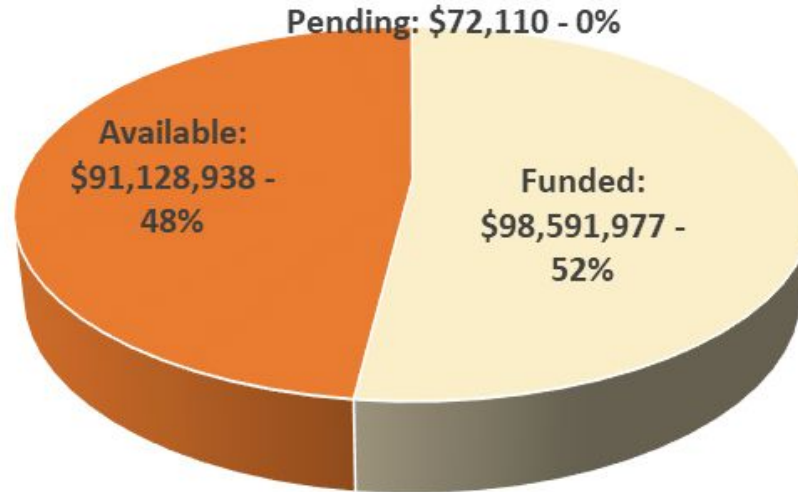
# Category 2 Budgets

- FY 2024 will be the 4th year of the current 5-year Category 2 budget which spans FY 2021 – FY 2025
- USAC has a [Budget Tracker](#) which shows the C2 funding status for applicants. Here's an example:

STEVENS POINT AREA SCHOOL DISTRICT	
■ Available C2 Budget Amount	\$1,062,922.28
C2 Budget	\$1,195,386.00
Funded C2 Budget Amount	\$104,113.72
Pending C2 Budget Amount	\$28,350.00
Available C2 Budget Amount	\$1,062,922.28

# WI Total 5-Year C2 Budget

**WI Total C2 Budget: \$189,973,025**



**FY 2024 and 2025 are last two years for this C2 funding cycle.**

# 2024 Application Timeline

- **January 12, 2024** - Last day for E-rate applicants to update their EPC Profile with lunch numbers, and enrollment information as shown in the DPI posted data.
- **February 28, 2024** - Last day to file Form 470 to comply with the minimum 28 day competitive bidding requirement. **DPI recommends filing by February 1, to make sure you have time to evaluate all bids and file your Form 471.**
- **January 17, 2024 - March 27, 2024** - Form 471 Filing Window.

# Thank You

<https://dpi.wi.gov/erate>

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