



March 19, 2018

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Ex Parte* Submission in Response to *Ex Parte* Letter of March 16, 2018 submitted on behalf of Ohio Information Technology Centers Seeking a E-rate Filing Extension  
Modernizing the E-rate Program for Schools and Libraries – WC Docket No. 13-184  
Schools and Libraries Universal Service Support Mechanism – CC Docket No. 02-6

Dear Secretary Dortch:

We are writing in response to the March 16, 2018 *Ex Parte* Notification submitted on behalf of Ohio Information Technology Centers (“Ohio ITCs”) in which Ohio ITCs request an extension of the March 22, 2018 deadline for submitting E-rate FCC Form 471 applications for funding. Ohio ITCs requested the filing extension due to their concern that the changed guidance for E-rate Funding Year 2018 related to requesting proposals for Bundled Internet Access Service caused confusion among applicants and service providers, and may lead to funding denials.

While we support the concerns brought to light in their *ex parte* submission, SECA does not agree with the requested extension or issuance of clarifying guidance at this late stage in the E-rate filing process for FY 2018. An extension will perpetuate rather than solve the problem and will undoubtedly delay the issuance of funding commitment decisions letters. Timely issuance of funding commitment decisions letters is of paramount concern to many applicants that need to purchase and install new equipment and infrastructure as quickly as possible, but must first be assured of E-rate funding before undertaking those projects.

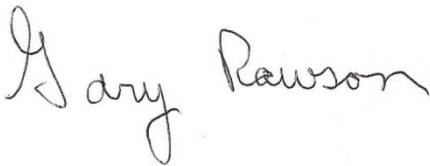
Further, it is too late in the process for any affected applicant to break a newly signed Internet contract, and conduct a new, valid procurement and bid evaluation. Certainly, most vendors would not be willing to break such a binding contract, and those who did and were not selected as the successful bidder of the new procurement would likely issue a bid protest.

**Instead of extending the Form 471 window, we believe that the best solution is for the FCC to instruct the E-rate administrator to not issue any funding denials where applicants attempted to comply in good faith with the Form 470 posting requirements for Internet service.**

Provided that an applicant included one service request for either *Internet Access & Transport Bundled, Leased Lit Fiber or Internet Access: ISP Service Only* on their establishing FCC Form 470, the applicant should be able to rely on this Form 470 to support an Internet access service funding request on their Form 471 application.

We believe that Ohio ITCs' *ex parte* submission sets forth a compelling case for returning to the bidding approach for Internet services that was in place prior to the changes introduced in late August of 2018, and that has worked well since the inception of the program. We would be happy to share our recommendations to improve the Form 470 for Funding Year 2019 with members of the FCC staff after the close of the filing window.

Respectfully submitted,

A handwritten signature in cursive script that reads "Gary Rawson". The signature is written in black ink and is positioned above the typed name and contact information.

Gary Rawson, Chair  
State E-rate Coordinators' Alliance  
Mississippi Department of Information Technology Services  
3771 Eastwood Drive  
Jackson, MS 39211  
601-432-8113 voice  
Gary.Rawson@its.ms.gov