

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC

In the Matter of

Improving FCC Form 470 Drop-down Menu

) WC Docket 13-184

COMMENTS OF MELINDA MILLER

Introduction:

I, Melinda Miller, hereby submit my comments on WC Docket No. 13-184, “Wireline competition Bureau and office of the managing director seek comment on improving FCC Form 470 Drop-down Menu”. I am the E-rate Program Manager at InterMountain Education Service District serving as E-rate Consultant to 85 applicants.

I support the Commission’s proposed criteria for Developing FCC Form 470 Drop-Down Menu Options. As a newcomer in 2017, and every year since, the drop-down selections cause a renewed feeling of anxiety in the fear that the “wrong” choice will cause financial distress for my client. It seems USAC revels in the ability to deny funding because the Form 470 drop-down choice does not match the subsequent service selected.

The advice of experts over the last three years to “select them all” if in doubt does absolutely no one any good. The Service Providers trying to determine the real needs of the applicant are confused and frustrated.

My suggestion for the FCC Form 470 is simple. Remove the drop-down. The only selection you should make is Category One or Category Two.

Moving forward with the topic of the Category One FCC Form 470; with all of the information available online, most potential bidders already know what type of service a district is using and, in many cases, how much they are paying for those services. All they need to know to bid is, what the bandwidth requirements are.

This will allow Applicants the opportunity to find the solutions that will best meet their needs at a cost they can afford.

Any data that the FCC wishes to extrapolate concerning the type of service applicants are using can be taken from the FCC Form 471 application, once the service type has been selected.

When applying for a years’ funding almost a year in advance, the simpler the Competitive Bidding process, the better. The consequences of overcomplicating this process are indeed, financially disastrous.