

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Modernizing the E-rate Program for Schools) WC Docket No. 13-184
and Libraries)

**REPLY COMMENTS
OF
NTCA THE RURAL BROADBAND ASSOCIATION**

NTCA–The Rural Broadband Association (“NTCA”)¹ hereby submits these reply comments in response to the October 1, 2019, Public Notice² released by the Federal Communications Commission’s (“Commission”) Wireline Competition Bureau (“Bureau”) in the above-captioned proceeding. The Public Notice seeks comment on potential improvements to FCC Form 470, which was created by the Universal Service Administration Company (“USAC”) at the Commission’s direction and is used by Schools and Libraries (“E-Rate”) applicants to solicit bids from service providers for E-Rate eligible services. The Public Notice specifically inquires as to ways the Form 470’s drop-down menu could be modified to avoid potential confusion by applicants and to allow service providers to more clearly identify the applicants’ needs.

¹ NTCA represents nearly 850 rural rate-of-return regulated telecommunications providers. All of NTCA’s members are full service local exchange carriers and broadband providers, and many of its members provide wireless, cable, satellite, and long distance and other competitive services to their communities.

² *Wireline Competition Bureau and Office of the Managing Director Seek Comment on Improving FCC Form 470 Drop-Down Menu*, Public Notice, WC Docket No. 13-184, DA 19-986 (rel. Oct. 1, 2019) (“Public Notice”).

NTCA submits these reply comments as part of its members' long-standing commitment to ensure the E-Rate program is as successful as possible in promoting access by every school and library to robust and affordable advanced communications services.³ NTCA members are quite proud of their successes in delivering high-quality, fiber broadband connections and other top notch services to the schools and libraries in their communities.⁴ As community-based providers, the owners and operators of these small companies live and work in the rural areas they serve, and send their children to the E-Rate beneficiaries they serve. They thus have a vested interest in ensuring that the program operates as efficiently and effectively as possible.

With this as backdrop, NTCA supports the creation of a new tab in the Form 470 drop-down menu that will enable applicants to readily indicate the address of the eligible entity or entities requesting proposals and the location(s) where the services requested would need to be delivered by service providers. Currently, as USTelecom demonstrated in its comments, the only way for E-Rate applicants to provide location-specific information in their Form 470 is to enter it into the narrative field.⁵ If an E-Rate applicant fails to include such information in the narrative field (or in an accompanying Request for Proposals, which is not required by the Form

³ See, e.g., Comments of NTCA – The Rural Broadband Ass'n, WC Docket No. 19-2 *et al.* (March 18, 2019); Comments of NTCA – The Rural Broadband Ass'n, WC Docket No. 13-184 *et al.* (July 1, 2019).

⁴ NTCA members reported in 2018 that more than 70% of the public libraries and 80% of primary/secondary schools in their service areas were connected to members' networks via fiber, and approximately 80% of public safety entities and hospitals/medical clinics in members' service areas could receive speeds of 25 Mbps or greater from members' networks. NTCA Broadband/Internet Availability Survey Report, Dec. 2018, available at https://www.ntca.org/sites/default/files/documents/2018-12/2018%20Broadband%20Survey%20Report_FINAL.pdf.

⁵ See Comments of USTelecom – The Broadband Ass'n, WC Docket No. 13-184, at 2 (Oct. 31, 2019) (“USTelecom Comments”).

470), service providers responding to a Form 470 must work to find such location-specific details in order to submit an accurate bid. This means service providers often must resort to emailing or calling applicants' representatives to identify the entity needing the service and the location(s) where the services are to be provided, both of which can be, and often are, different from the applicant. All of this can be tough to complete in the standard 28-day open bidding window, causing an applicant to miss out on potential bids and some service providers unable to offer a bid. Alternatively, a lack of specific address information may cause a service provider to believe a bid does not involve an eligible entity in or near its serving area, causing the provider to decline to bid to provide service despite perhaps offering the most effective and efficient option for service to any given school or library.

NTCA members have an average service area of approximately 2,244 square miles.⁶ Therefore, accurately identifying where the requested service is needed is critical to preparing an accurate bid, as an E-Rate entity's locations could be spread throughout a member's service area. Furthermore, for NTCA members, the additional work needed to prepare a bid for requested services in a compressed time-frame can be quite burdensome. NTCA members are small businesses operating in far-reaching, sparsely populated areas with very few employees. Those employees charged with responding to FCC Form 470 applications "wear multiple hats," and responding to the E-Rate beneficiaries' requests for service is only one task among many that any given employee must complete. Of course, the additional work of providing additional details on the "back-end" falls upon E-Rate applicants as well – school and school district administrators' time would be much better spent on their core missions than responding to

⁶ See NTCA 2019 Broadband Survey Report, *infra* n. 3.

service providers' requests for location-specific data when such data can and should be easily identified in the Form 470.

To eliminate the need for service providers and E-Rate applicants to spend time on the “back-end” identifying the specific entity and location for the requested service, NTCA supports USTelecom’s proposal to modify the Form 470 drop-down menu to allow the applicant to select the location(s) at which service is being requested.⁷ E-Rate applicants already must submit the locations of their affiliated eligible entities in their E-Rate Productivity Center (“EPC”) profile, which is also administered by USAC. Accordingly, the Form 470 could be modified to integrate the EPC locations into a drop-down menu of the E-Rate entity’s affiliates and locations. By integrating the EPC locations, E-Rate applicants will not need to spend any additional time identifying their locations when completing the Form 470 or risk mistyping any addresses when completing the application. To further minimize potential confusion, NTCA recommends the drop-down menu include a clarification instructing applicants to exclude entities on the Form 470 that simply utilize the service from the applicant’s host location but are not part of the services being requested.

Creating a new tab in the Form 470 drop-down menu for selecting the specific entity and location for the service being requested would benefit E-Rate applicants by eliminating the need to respond to service providers’ inquiries about the locations to be served and eliminating the risk that applicants would miss out on potential bids due to providers’ inability to track down the locations involved and prepare a bid within the allotted time-frame. Ultimately, by allowing applicants to easily include location information on the front-end, both applicants seeking

⁷ USTelecom Comments at 2.

service and those interested in providing the service will be “on the same page” from the beginning, ensuring that bidders can submit both accurate and timely bids that reflect and respond to the true nature of E-rate beneficiaries’ requests for service. Members of the community who use the schools and libraries will be the ultimate beneficiary of this simple, but important, change.

Respectfully submitted,



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November 15, 2019