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Before the
Federal Communications Commission
Washington, DC 20554

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In the Matter of	)	
	)	
Modernizing the E-rate Program for	)	WC Docket No. 13-184
Schools and Libraries	)	
	)	
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Reply Comments of
Oregon Department of Education
Regarding Improvements to the FCC Form 470 Drop-Down Menu
In Response to Public Notice DA 19-196

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l. INTRODUCTION

Oregon Department of Education (ODE) has supported the E-Rate program since its inception in 1998. The state of Oregon currently serves 197 School Districts, 1,250 Public Schools, 127 Public Charter Schools, and 19 Regional Education Service Districts. We provide state E-rate coordination and are an active member of the State E-Rate Coordinators' Alliance ("SECA").

ll. SUPPORT OF INITIAL & REPLY COMMENTS

The Oregon Department of Education concurs with SECA's initial comments filed on October 31, 2019. SECA has also filed reply comments for corrections and clarifications to the initial comments in which we support. The comments addressed a plethora of issues experienced by many Oregon applicants, especially in relation to the current Form 470 dropdowns. The most significant complications have come from the mismatch of dropdown selections and the uncertainty of the necessary dropdown to select on both Category 1 and Category 2 dropdowns. The dropdown format causes confusion resulting in denials which have left some

applicants on the hook for the full cost of goods and services. Some of these denials are received at the invoicing state or later after an applicant has already made the purchase causing extreme hardship, especially for our small, rural districts with limited funding. The vast majority of our applicants rely on the E-rate reimbursements to receive specific goods and services and would not proceed with purchases without a USAC funding commitment.

Although we have been pleased with the FCC's efforts to provide relief with the hold-harmless letters sent to USAC for FY18 and FY19 Category 1 applications, we recognize this issue will only continue without the proper modifications. The proposed flowchart presented in SECA's comments encompass a more distinct process of accurate selection, a flow of selections as opposed to a drop down of all possible options. This is a more direct approach that will alleviate some confusion for applicants and service providers.

III. CONCLUSION

We are appreciative of the opportunity to provide our support of recommended remedies to the Form 470 dropdowns. The FCC's effort to resolve recurring issues within the program has been observed and appreciated. With some continuing improvements, this program will better assist in supporting the schools in our state. We respectfully request that the Form 470 application be redesigned consistent with SECA's recommendations.

Respectfully submitted,

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