

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

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 Funds For Learning, LLC  
on  
Proposed Improvements to the FCC Form 470 Drop-Down Menu  
(Public Notice DA 19-196)**

*"Any intelligent fool can make things bigger and more complex... It takes a touch of genius --- and a lot of courage to move in the opposite direction."*  
— Albert Einstein

Accordingly and for all of the reasons that SECA has voiced so thoughtfully and convincingly in its comments,<sup>1</sup> we urge the Commission to make the Form 470 much less complex and confusing, and thus much more fair and effective, by (1) eliminating all of the drop-down service menus from the form and (2) replacing them with the "Guided Flow Chart Approach" to service descriptions that SECA has proposed in its comments. SECA explains that the Form 470 revisions it is proposing will "(1) enable applicants to solicit bids in a streamlined and easy to understand process, and (2) enable service providers to readily obtain an accurate reflection of applicant needs in order to submit reasonable bids." We agree completely.

The Form 470 drop-down menus have been ineffective in terms of improving the overall efficiency and effectiveness of the Form 470 competitive bidding process. They were supposed to be helpful, but they became instead and, in effect, bureaucratic quicksand, trapping and then drowning large numbers of unsuspecting applicants who failed to appreciate the real danger that those confusing menus presented to their applications and, ultimately, to their funding.

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<sup>1</sup> <https://www.fundsforlearning.com/docs/2019/11/SECA%20Initial%20Comments%20Form%20470.pdf>

Because of the extreme and disproportionately unfair impact that drop-down menu-related mistakes have had on funding to which applicants would otherwise be entitled, we also urge the Commission not to deny funding to applicants that in the future make (and in the past have made) reasonable, good faith efforts to comply with the Form 470's service description requirements and whose forms reasonably indicate what kind of service they were in the market to procure.

A "Rube Goldberg" machine is a complex contraption designed to achieve a simple task.<sup>2</sup> The drop-down service menu system is a perfect example of such a machine, because it takes what should be a simple task and makes it complicated, in a way that is entirely unnecessary. The "Guided Flow Chart Approach" that SECA is proposing will fix this by enabling applicants to complete the simple task of explaining what exactly it is that they are in the market to procure in a relatively simple, straightforward, easy-to-understand fashion. That is why we support it.

On the other hand, we strongly oppose US Telecom's proposal "to direct USAC to alter the current process to add a drop down list that would display and allow the selection of the entities and the physical addresses from the USAC EPC database in order to indicate where they would like services to be installed and/or delivered based on the quantity selected."<sup>3</sup> This proposal should be rejected for three, very good reasons.

First, it is unnecessary. US Telecom argues that it "will make it easier for a bidder to evaluate RFPs and determine whether they want to submit a bid." That is not true. Applicants already include the most up-to-date version of this information (which may or may not match what is in EPC) in their RFPs. Second, specific site information is oftentimes irrelevant, as applicants frequently procure services on a system-wide basis.

Finally, rather than making the process of completing a Form 470 less Rube Goldbergian, adding a new drop-down menu would make the process more complex. As we have already discussed, SECA explained convincingly why a system of drop-down menus in the online Form 470 is problematic and why it should be eliminated. It makes no sense, therefore, to add a new one to the form. Clearly, this is not a good idea. It would increase confusion and frustration among applicants, create a new potential for inadvertent mistakes that lead to the unfair loss of funding, and form another hurdle in the relationship between applicants and USAC.

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<sup>2</sup> <https://www.merriam-webster.com/dictionary/Rube%20Goldberg>

<sup>3</sup> [https://www.fundsforlearning.com/docs/2019/11/USTelecom%20-%20The%20Broadband%20Association%20E-Rate%20Drop%20Down%20Comments\\_FINAL.pdf](https://www.fundsforlearning.com/docs/2019/11/USTelecom%20-%20The%20Broadband%20Association%20E-Rate%20Drop%20Down%20Comments_FINAL.pdf)

Respectfully submitted,

/s/John D. Harrington

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