

Wireline Competition Bureau
Federal Communications Commission
445 12th St. SW, Washington, DC 20554

Re: WC Docket No. 13-184

To whom it may concern:

I would like to submit comments on the Public Notice issued on October 1st, 2019 seeking comments on improving the Form 470 drop-down menu.

I thank you for your time and consideration of these comments.

Respectfully,

Tim Jones
E-rate Specialist
Linn Benton Lincoln ESD

FCC Form 470

Drop-down Improvement Ideas

Improvement Ideas

It is great to see the FCC taking action on this issue. Many applicants have had trouble figuring out the FCC Form 470 drop-downs and this has led to several funding issues, and has possibly also led to applicants receiving incorrect bids or fewer bids on products and services. I would like to offer some suggestions on how to best structure the choices in order to help eliminate this issues.

Proposed Drop-down Menu Choices

Category of Service Drop-down

- Category One
- Category Two

Service Type Drop-down (Category One)

- ISP Service
- Fiber Service

Service Type Drop-down (Category Two)

- Internal Connections
- Basic Maintenance of Internal Connections
- Managed Internal Broadband Service

ISP Service Type Multi-select checkboxes

- Internet access with service provider provided connection to building or hub
- Internet Access with applicant provided connection from building or hub to service provider
- Internet Access using wireless technologies
- Other

Fiber Service Type Multi-select checkboxes

- Leased Lit Fiber
- Leased Dark Fiber
- Self-Provisioned Network
- Network equipment
- Maintenance & Operations
- Wireless Data Transmission
- Installation
- Other

Internal Connections Service Type Multi-select checkboxes

- Fiber cabling and necessary components
- Ethernet cabling and necessary components
- Caching and necessary software
- Firewall and necessary software
- Racks and necessary components

- Routers and necessary software
- Switches and necessary software
- UPS/Battery backup and necessary software
- Wireless access points and necessary software
- Wireless controller and necessary software
- Miscellaneous components
- Network security equipment and necessary software
- Installation
- Other

Basic Maintenance of Internal Connections Type Multi-select checkboxes

- Fiber cabling including components
- Ethernet cabling including components
- Firewall including components
- Racks including components
- Caching including components
- Routers including components
- Switches including components
- UPS/Batter backups including components
- Wireless access points including components
- Wireless controller including components
- Network security equipment including components
- Other

Managed Internal Broadband Services Multi-select checkboxes

- Management of Existing Equipment
- Management of Leased Equipment
- Other

Drop-downs

There needs to be only two drop-down choices. The first to specify Category One or Category Two services, and the second that changes the choices provided based on the first choice. If Category One is selected the second drop-down will contain the Category One sub choices: ISP Services, Fiber Services. If Category Two is selected the second drop-down will contain the Category Two sub choices: Internal Connections, Basic Maintenance of Internal Connections (BMIC), Managed Internal Broadband Services (MIBS).

Category of Service

Category One ▾

Service Type

Select your answer ▴

ISP Service

Fiber Service

Category of Service

Category Two ▾

Service Type

Select your answer ▴

Internal Connections

Basic Maintenance of Internal Connections (BMIC)

Managed Internal Broadband Services (MIBS)

DROPDOWN EXAMPLES

These two drop-downs are all that is needed to clearly identify what types of services are needed. From here applicants will make the rest of their choices using multi-select check boxes.

Multi-Select Checkboxes

All of the choices from here forward should be multi-select checkboxes so the applicant can chose all types of services they are interested in, and/or choose multiple choices if they are unsure of which box to select. These choices will also be more descriptive where needed. There should also be an “Other” choice for each service type so applicants can enter what they need if they cannot clearly identify their choice. This can greatly reduce the errors that have been plaguing applicants.

Category of Service

Category One ▾

Service Type

ISP Service ▾

ISP Service Type

Select all that apply.

☐ Internet access with service provider provided connection to building or hub

☐ Internet Access only with applicant provided connection from building or hub to service provider

☐ Internet Access using wireless technologies

☐ Other

Category of Service

Category One ▾

Service Type

Fiber Service ▾

Fiber Service Type

Select all that apply.

☐ Leased Lit Fiber or Equivalent

☐ Leased Dark Fiber or Equivalent

☐ Self-Provisioned Network

☐ Wireless Data Transmission

☐ Network Equipment

☐ Maintenance & Operations

☐ Installation

☐ Other

MULTI-SELECT CHECKBOX EXAMPLES

Once selections are made using the multi-select check boxes, the form should then ask for additional information for each choice selected. This will include information such as quantity, capacity, narrative, and preferred make and model. Once an applicant has filled in the additional information they should be prompted if they want to enter an additional service request.

Additional Considerations

The Form 470 should also have language built in to protect applicants from competitive bidding violations and potential financial hardships since applicants are not always required to post an RFP. Examples of possible language may include:

Work offered may be contingent upon receiving a funding commitment from USAC for the specified services. If the funding request is denied or reduces, all or part of the project may canceled. Such cancellations shall not constitute any financial obligation on the part of the applicant.

The E-rate funding year begins on July 1 of the named funding year and expires on June 30 of the following year, resulting in a period of 12 months. No category one reoccurring services, basic maintenance of internal connections, or managed internal broadband services may be delivered outside of the funding year. If construction is necessary to deliver category one services, construction may begin up to 6 months in advance of the start of the funding year. Category two internal connections may be purchased 3 months prior to the start of the funding year. Installation of category two internal connections must be completed within three months after the end of the funding year. Contract period will correspond with the E-rate eligible periods describe above. Extensions to contracts will be allowed according to E-rate rules regarding service extensions. By providing a bid the Service Provider confirms they can provide services within these timeframes as failure to do so can result in financial hardship for the applicants.

If combined total for all products and services exceeds remainder of an entities Category 2 Budget, the applicant may choose to select to only purchase products and services offered up to the amount remaining in the Category Two budget.

Whenever specifications of any products or services are indicated by a specific proprietary name, manufacturer name, or model name, such specifications shall be deemed to be used the purpose of facilitating a description of the products or services desired and any products or services of equal or greater equivalency will be considered.

The successful Service Provider must accept either Billed Entity Application Reimbursement (BEAR) FCC Form 472, or Service Provider Invoice (SPI) FCC Form 474, invoicing per E-rate rules. The invoicing method chosen will be at the discretion of the applicant.

Drop-down Workflow

- Drop-down: Category of Service
- Choices: Category One; Category Two
- If User Selects “Category One”
 - Drop-down: Service Type
 - Choices: ISP Service; Fiber Service
 - If User Selects “ISP Service”:
 - Multi-select Checkbox:
 - Choices: Internet access with service provider provided connection to building or hub; Internet Access with applicant provided connection from building or hub to service provider; Internet Access using wireless technologies; Other
 - If User Selects “Other”:
 - Provide a textbox to enter the value
 - For Each Service User Selects:
 - Provide textbox for quantity
 - Provide textbox for minimum capacity
 - Provide textbox for maximum capacity
 - Provide textbox for narrative
 - If User Selects “Fiber Service”:
 - Multi-select Checkbox:
 - Choices: Leased Lit Fiber or equivalent; Leased Dark Fiber; Self-Provisioned Network; Networking Equipment; Maintenance and Operations; Wireless Data Transmission; Installation; Other
 - If User Selects “Other”:
 - Provide a textbox to enter the value
 - If User Selects “Leased Lit Fiber or equivalent; Leased Dark Fiber; Self-Provisioned Network; or Wireless Data Transmission;”:
 - Provide textbox for quantity
 - Provide textbox for minimum capacity
 - Provide textbox for maximum capacity
 - Provide textbox for narrative
 - If User Selects “Networking Equipment”:
 - For each type of equipment selected:
 - Provide textbox for quantity
 - Provide Drop-down for type: Transceiver; Firewall and necessary software; Racks and necessary components; Miscellaneous components; Network security equipment and necessary software; Installation; Other
 - Provide textbox for preferred make
 - Provide textbox for preferred model
 - Provide textbox for narrative
 - Ask if additional makes and models are needed
 - If User Selects “Yes”:

- Provided the choices above again and repeat as needed
 - If User Selects “No” do nothing
 - If User Selects “Maintenance and Operations”:
 - Provide textbox for narrative
 - If User Selects “Installation”:
 - Do nothing
- If User Selects “Category Two”
 - Drop-down: Service Type
 - Choices: Internal Connections; Basic Maintenance of Internal Connections; Managed Internal Broadband Service
 - If User Selects “Internal Connections”:
 - Multi-select Checkbox:
 - Choices: Fiber cabling and necessary components; Ethernet cabling and necessary components; Caching and necessary software; Firewall and necessary software; Racks and necessary components; Routers and necessary software; Switches and necessary software; Wireless access points and necessary software; Wireless controller and necessary software; Miscellaneous components; Network security equipment and necessary software; Installation; Other
 - If User Selects “Other”:
 - Provide a textbox to enter the value
 - For Each Service User Selects:
 - Provide textbox for quantity
 - Provide textbox for preferred make
 - Provide textbox for preferred model
 - Provide textbox for narrative
 - Ask if additional makes and models are needed
 - If User Selects “Yes”:
 - Provided the choices above again and repeat as needed
 - If User Selects “No” do nothing
 - If User Selects “Installation”:
 - Do nothing
 - If User Selects “Basic Maintenance of Internal Connections”:
 - Multi-select Checkbox:
 - Choices: Fiber cabling and necessary components; Ethernet cabling and necessary components; Caching and necessary software; Firewall and necessary software; Racks and necessary components; Routers and necessary software; Switches and necessary software; Wireless access points and necessary software; Wireless controller and necessary software; Network security equipment and necessary software; Other
 - If User Selects “Other”:
 - Provide a textbox to enter the value
 - For Each Service User Selects:
 - Provide multi-select field for the buildings that will receive service
 - Provide textbox for narrative

- If User Selects “Managed Internal Broadband Service”:
 - Multi-select Checkbox:
 - Choices: Management of Existing Equipment; Management of Leased Equipment; Other
 - If User Each Service User Selects:
 - Provide multi-select field for the buildings that will receive service
 - Provide textbox for narrative
 - If User Selects “Other”:
 - Provide a textbox to enter the value

