



2575 Kelley Pointe Parkway, Suite 200
Edmond, OK 73013

phone 405-341-4140
fax 866-552-8110

www.FundsForLearning.com

November 3, 2021

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

RE: **Ex Parte Submission**

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

Schools and Libraries Universal Service Support Mechanism -- CC Docket No. 02-6

Establishing Emergency Connectivity Fund to Close the Homework Gap -- WC Docket No. 21-93

Dear Ms. Dortch:

Enclosed is the 2021 E-rate Trends Report. It reflects the thoughts and opinions of 2,164 individuals who responded to a nationwide survey conducted in June 2021. Together, these individuals form a highly accurate sample of 10.1% of all E-rate applicants. This is the highest response rate in the 11-year history of the survey, and it would not have been possible without the support of members from the State E-rate Coordinators' Alliance (SECA) and the E-rate Management Professionals Association (E-MPA).

Respectfully submitted,

/s/ John D. Harrington

John D. Harrington

Chief Executive Officer
Funds For Learning, LLC
2575 Kelley Pointe Parkway, Suite 200
Edmond, OK 73013

Funds For Learning, LLC
Ms. Marlene H. Dortch
November 3, 2021

cc: Chairwoman Jessica Rosenworcel
Commissioner Brendan Carr
Commissioner Geoffrey Starks
Commissioner Nathan Simington
Office of Managing Director
Wireline Competition Bureau

2021 E-rate Trends Report

CONNECTION



Presenting the

2021 E-RATE TRENDS REPORT

ABOUT THE ANNUAL TRENDS REPORT

The E-rate program supports nearly every school and library in America, annually providing billions of dollars of much needed support for Internet access and computer networking. Over 21,400 applicants and 4,000 vendors currently participate in the program. For most, their perception of the program is limited to a handful of funding requests and a few personal interactions with USAC customer service representatives.

The purpose of this analysis is to provide stakeholders with a broader picture of the E-rate program. The data and information provided are derived from publicly available funding request data as well as a nationwide survey of applicants conducted in June 2021. All information are current as of July 1, 2021.

This report is not intended to be an encyclopedic review of the program. There are many additional statistics and reports that could be presented. Furthermore, while we strive to be fair and even-handed, this is not a scientific analysis conducted by an independent third-party.

It is our hope that this information will serve as a catalyst for discussion, new ideas, and ultimately, further improvements to this vital program.

ABOUT THE E-RATE DISCOUNT PROGRAM

Universal Service Funding for Schools and Libraries, commonly referred to as the E-rate program, provides discounts to eligible entries in the United States towards the purchase of goods and services necessary to connect students and library patrons to the Internet.

A Note from
John Harrington



Dear E-rate Stakeholder,

This past year has underscored the importance of connections. We have felt the disruption of our connections in many ways - personal connections, community connections, and school connections. 2021 also called attention to the vital importance of fast, reliable Internet connections for K-12 schools and public libraries, in order to connect citizens and educate students. The E-rate program provides tremendous financial support for these critical connections and continues to play a vital role in bridging parts of the digital divide.

The data compiled in the 2021 E-rate Trends Report is derived from a survey of all E-rate applicants across schools, districts, and libraries throughout the US. Over 10% of all E-rate applicants responded to the latest survey, representing the highest response rate to date. Thank you to all who took the time to share your E-rate experiences, it represents an industry-wide effort focused on continual improvement. The E-rate is a multifaceted program, representing billions of federal dollars that provide opportunities to connect students and library patrons. Having a resource that compiles the perspectives of applicants is important, and this report provides essential insights to policy makers, regulators, and administrators of the needs and experiences of E-rate program participants. Your voices help shape the future of the program, helping the E-rate evolve with the changing needs of its constituents. By each applicant taking a few minutes to share their experiences, trends emerge, and insights can be gleaned.

The E-rate program has hit another threshold in 2021, as a record number of sites are receiving support. Contrary to common misconception, the needs for internet bandwidth and on-campus networking grew due to COVID-19, even with many students learning off-campus. The dramatic rise in the use of video conferencing and the number of connected devices being used by students and library patrons will continue to put increased pressure on broadband networks. Moreover, as campuses reopen, Wi-Fi networks will play an even larger role, making the Category Two portion of the E-rate program more essential than ever. With increased usage, new devices and more demand, network security remains a serious and urgent concern among applicants. The responses to this survey may help drive change in this arena.

We hope you enjoy reading through these insights and find it useful when sharing your E-rate progress with colleagues and other leaders. We appreciate the opportunity to work together to enhance this valuable program. Ultimately, it is all about connections. We appreciate our connection with you and all you do to serve your constituents.

Sincerely,

John D. Harrington

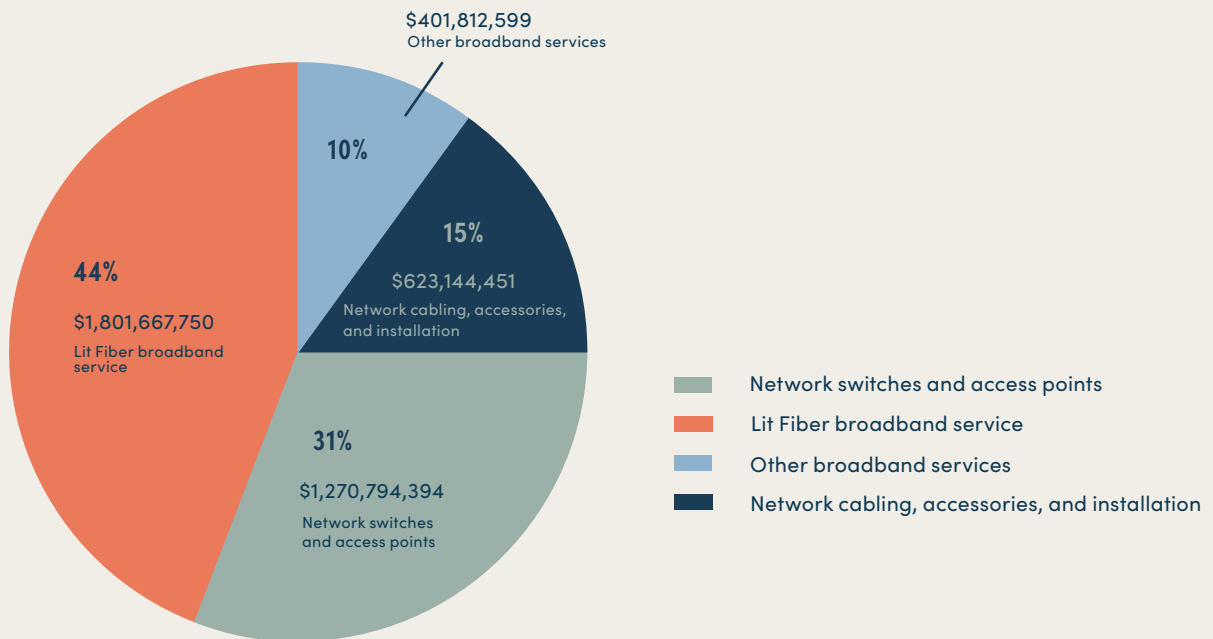
Table of Contents





A Note from John D. Harrington	3
The 2021 Request Data	6
The 2021 E-rate Trends Report	10
Record Survey Reponse	11
Survey Demographics	13
Services	14
Wi-Fi	16
Off-Campus Internet	18
USAC	20
EPC Portal	21
FCC Goals	22
Program Impact	25
Voices	
A Letter of Gratitude	26
Open-Ended Responses	29
Professional Standard of Conduct	62

Allocation of FY2021 E-rate Funded Services and Projects



CATEGORY 1

- + Data Transmission Services
- + Internet Access

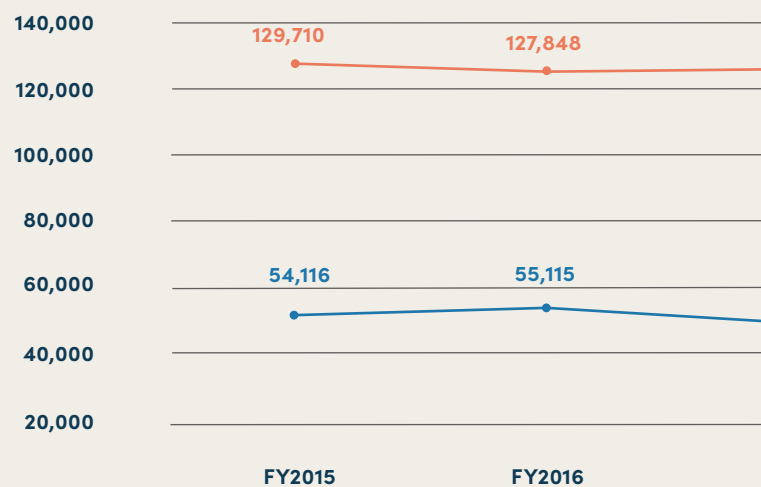
CATEGORY 2

- + Internal Connections include:
 - Access Points
 - Routers
 - Switches
 - Hubs
 - Wiring
- + Managed Internal Broadband
- + Basic Maintenance

Sites Receiving E-rate Support

Count of Sites Listed on Applications for C1 and C2 Services

- Data/Internet (C1)
- On-Campus (C2)

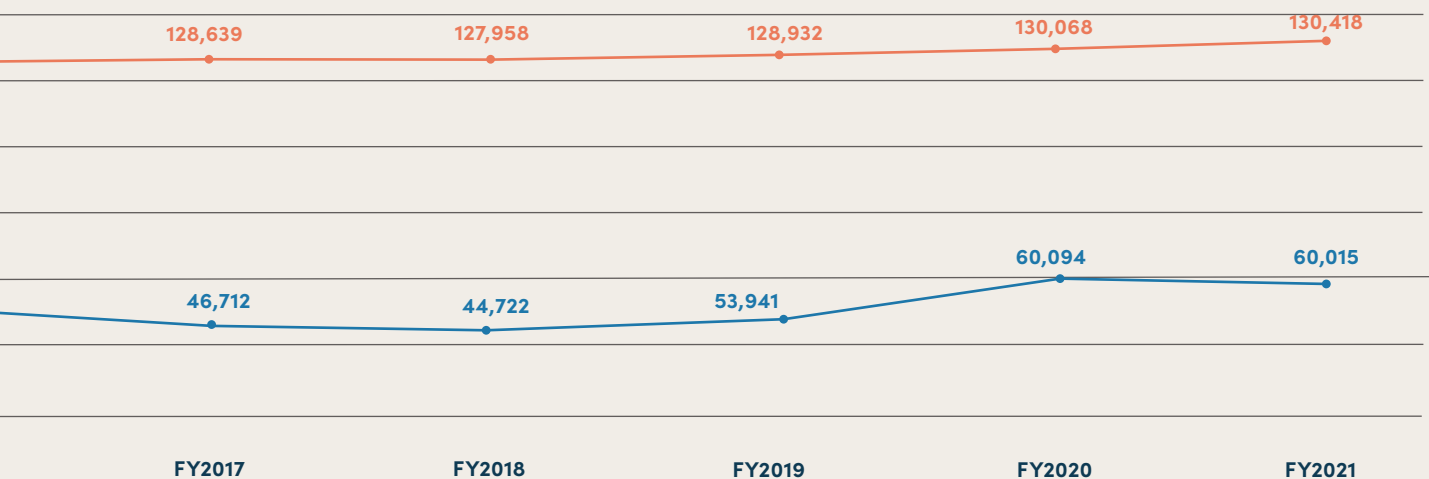


The 2021 Request Data

E-rate funding request data are publicly available and provide unique insight into the connectivity needs of schools and libraries. The most basic data include an applicant's name, their service provider(s), E-rate discount rate, and the category of the goods and services being requested (Internet access, internal connections, and so on). These data have been available since year one of the program and provide the most consistent source of data for year-to-year comparisons.

Beginning in 2015, applications have required detailed line item information for each funding request, such as specific line counts, connection speeds, unit quantities, and make and models of equipment.

There is variation in how applicants prepare their responses. As more data are collected and as applicants receive consistent guidance, it is expected that the detailed funding request information will become more useful for year-to-year trend analysis.



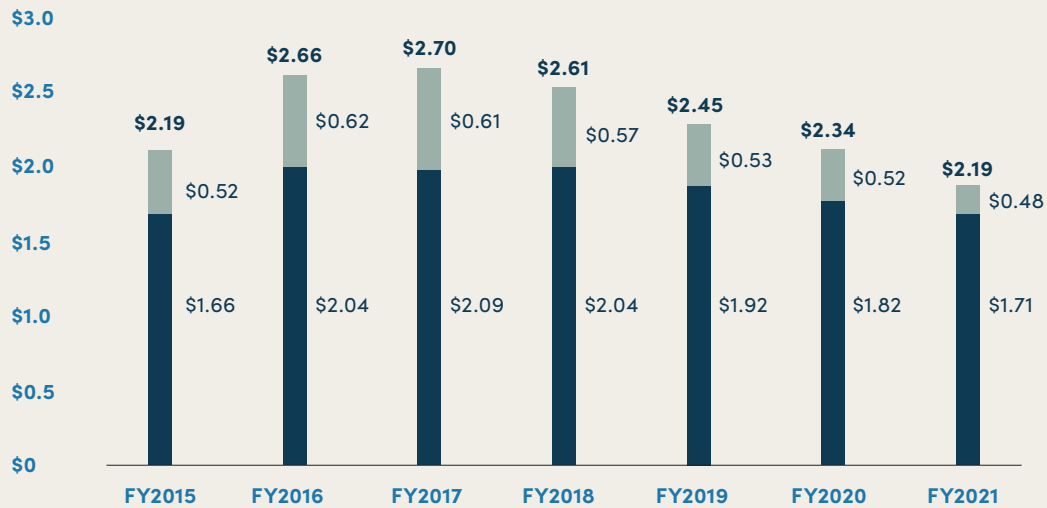


The 2021 Request Data

E-rate and Internet Data Services ("C1")

In Billions

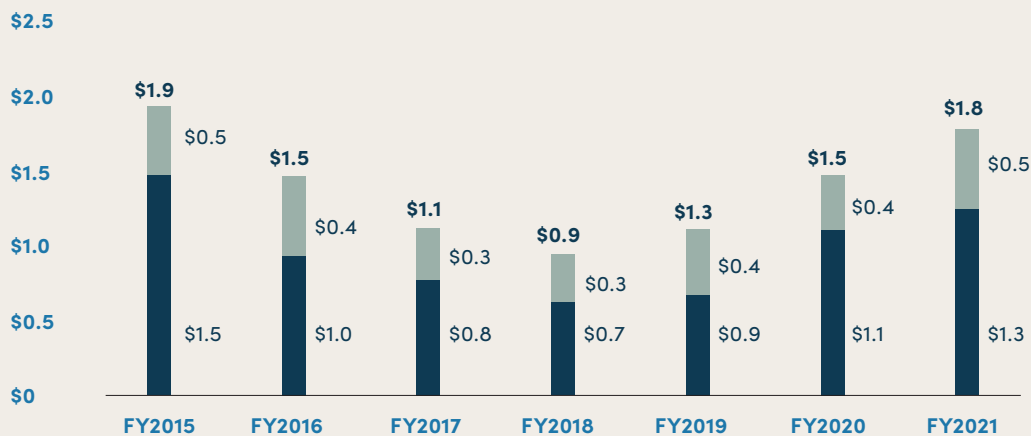
- E-rate discount
- Applicant payment



E-rate On-Campus Wi-Fi and LAN ("C2")

In Billions

- E-rate discount
- Applicant payment



2021 E-RATE TRENDS REPORT

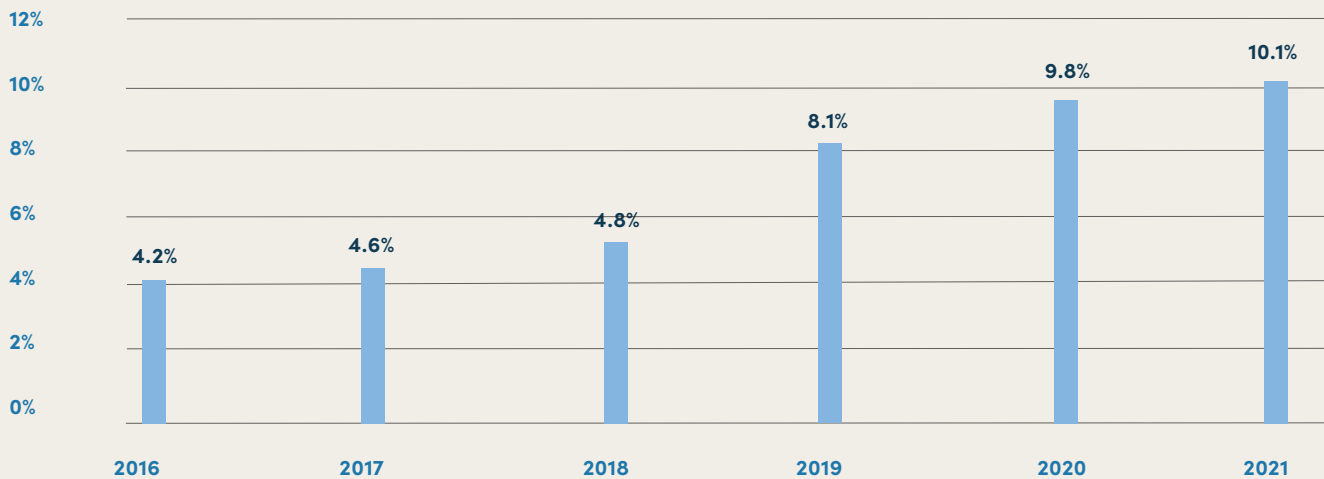
In June 2021, Funds For Learning conducted its 11th annual E-rate survey, designed to gather feedback and insight from the schools and libraries that participate in the program. The survey is necessary because E-rate funding request data paint an incomplete picture.

Not all information is gathered on Form 471 funding applications. For example, applicants may need services that currently do not qualify for E-rate discounts. These services are not included on funding applications.

Additionally, there is no basic mechanism for applicants to provide feedback to the FCC about the administration of the program. Applicants can submit Letters of Appeal to the FCC; however, this only captures a certain subset of feedback, mainly negative, related to specific USAC actions or decisions. There is no forum for applicants to express what is working well.

This year's survey received 2,164 applicant responses, corresponding to approximately 10.1% of all E-rate applicants. Because the respondents represent a cross-section of applicants that closely matches the overall population of E-rate applicants, we believe that this survey provides the most precise picture available to understand the overall needs and experience of E-rate applicants as of the spring of 2021.

Record Survey Response Rate



11th Annual Survey

2,164 responses in 2021

Industry-wide effort

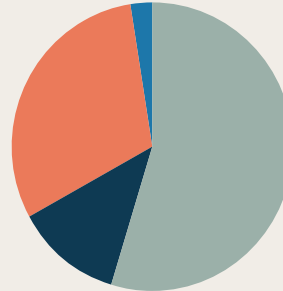
Support from SECA and E-mpa®



Survey Demographics

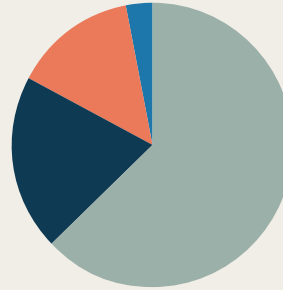
Total 2021 Applicant Demographics

55%	District
12%	Library
31%	School
2%	Consortium

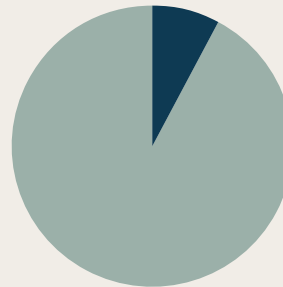


Survey Respondents

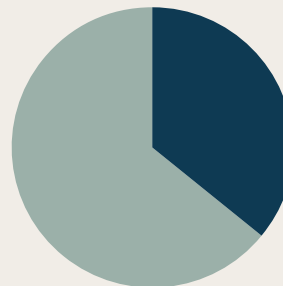
63%	District
20%	Library
14%	School
3%	Consortium



92%	Public
8%	Non-Public

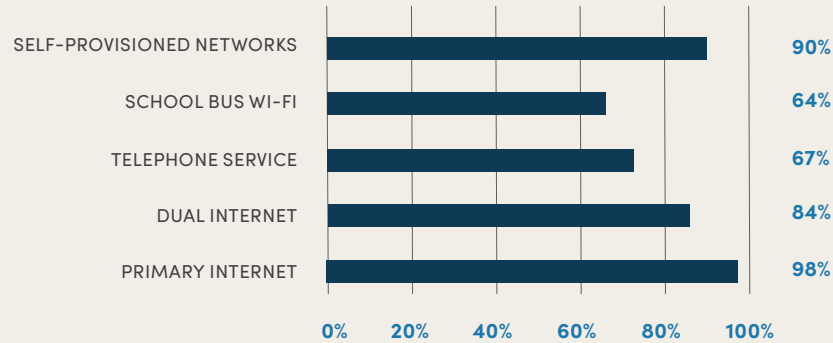


64%	Rural
36%	Urban

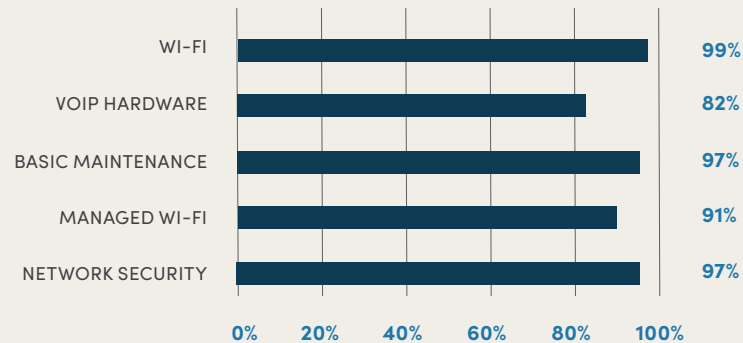


Services

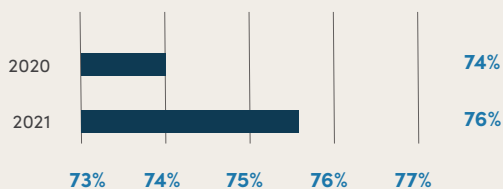
Which of the following services should qualify for Category One E-rate support?



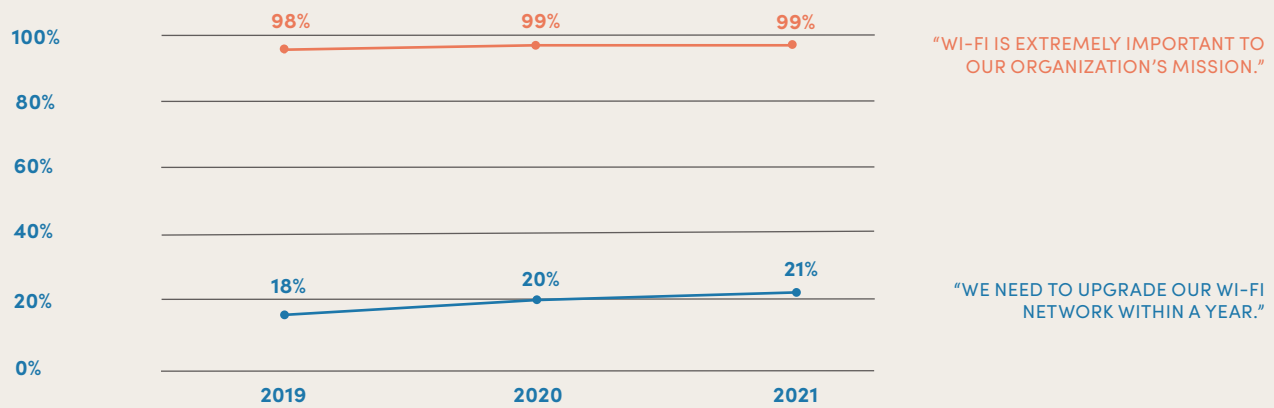
Which of the following services should qualify for Category Two E-rate support?



My organization perceives threats to network security off-campus as a serious and urgent concern.



Forecasted C2 Demand Remains Strong



**The importance of on-campus networking
has increased due to COVID-19**

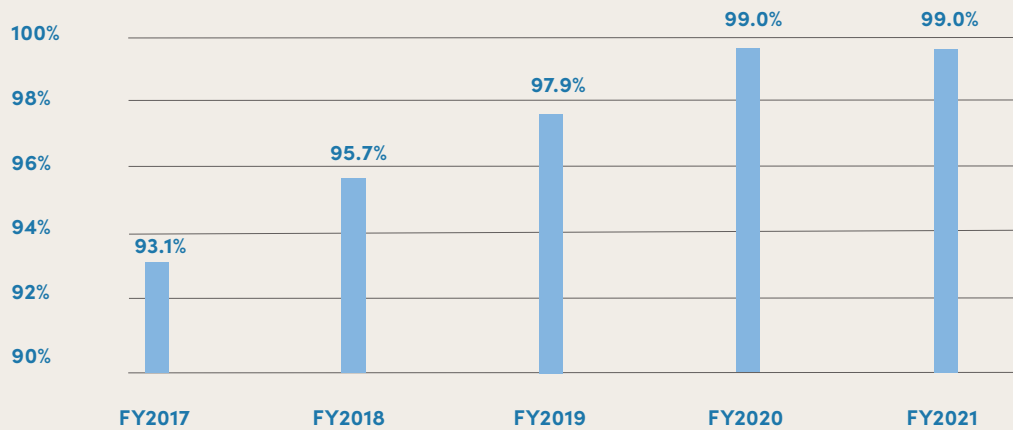
Demand remains very high

**46% of applicants strongly agree
that they anticipate applying
for Category 2 discounts in 2022
(down from 51% in 2021)**

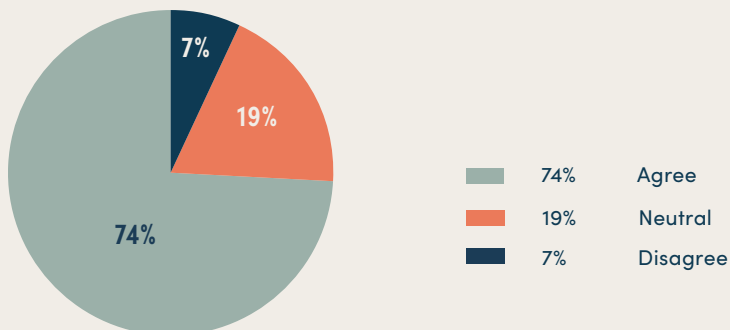
WI-FI

How important is Wi-Fi to fulfilling your organization's mission?

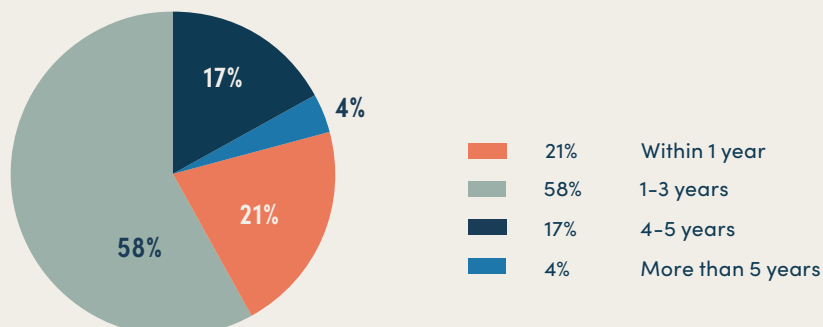
Absolute Requirement/Extremely Important



My organization intends to apply for Category 2 discounts next year, in Funding Year 2022.

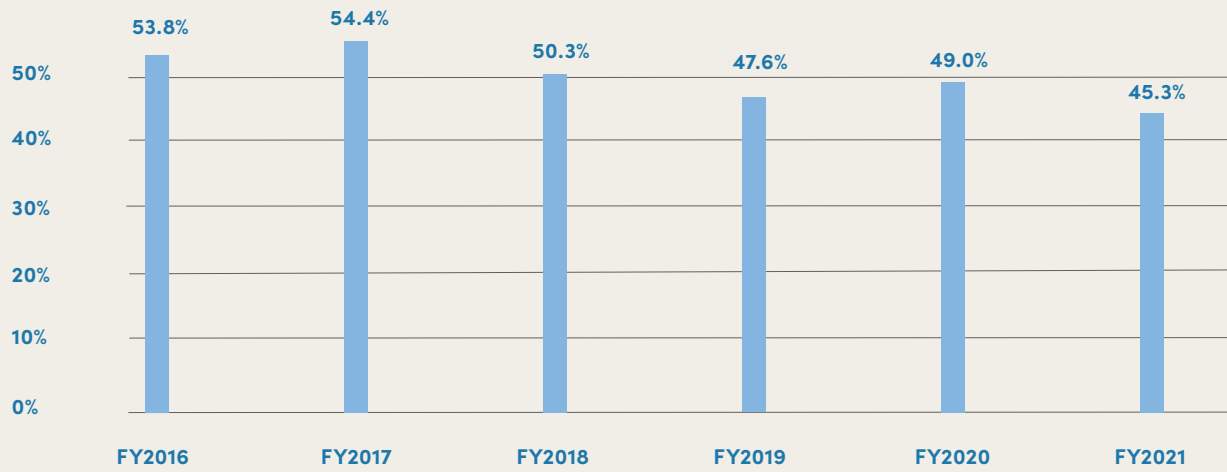


When will you need to upgrade your current Wi-Fi network?



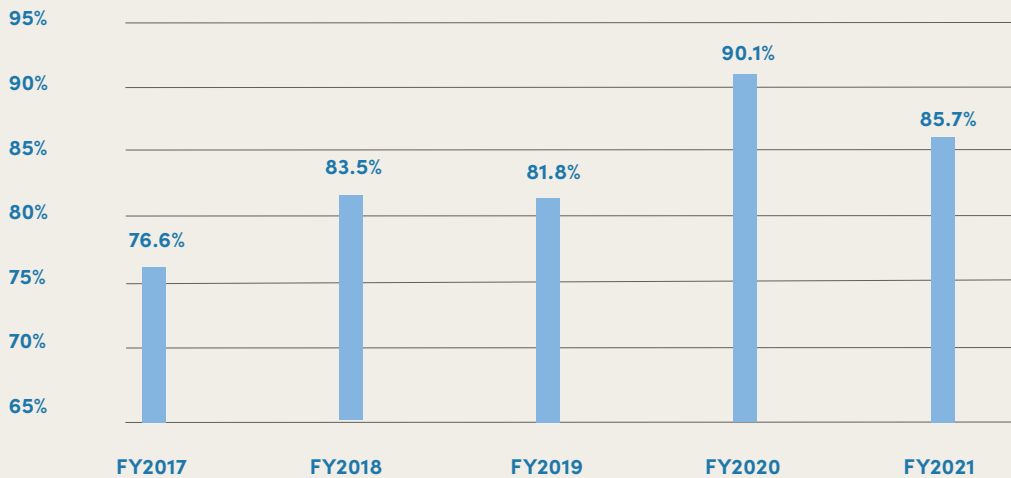
Future Internet Bandwidth

Average estimated increase in Internet bandwidth over the next 3 years

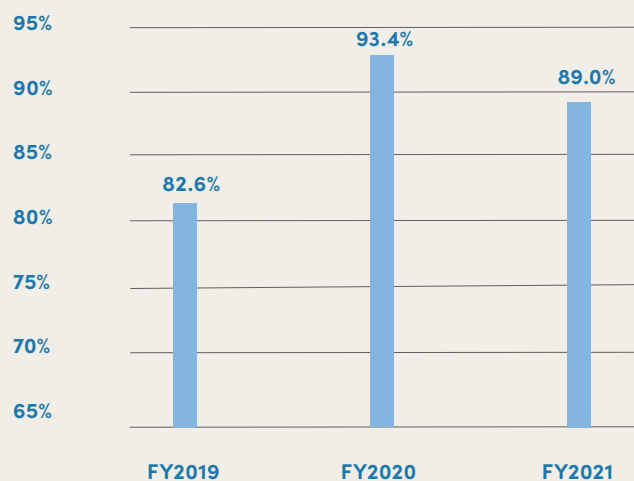
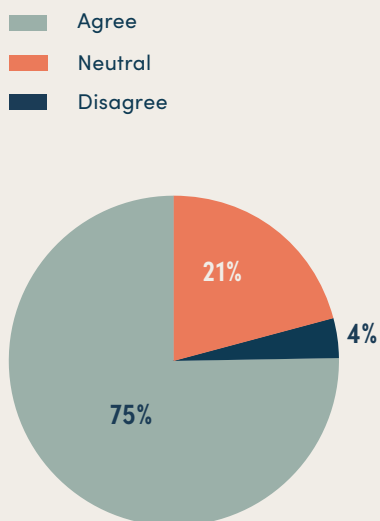


Off-Campus Internet

Insufficient Internet access to the home of students or library patrons is a significant issue in our community.



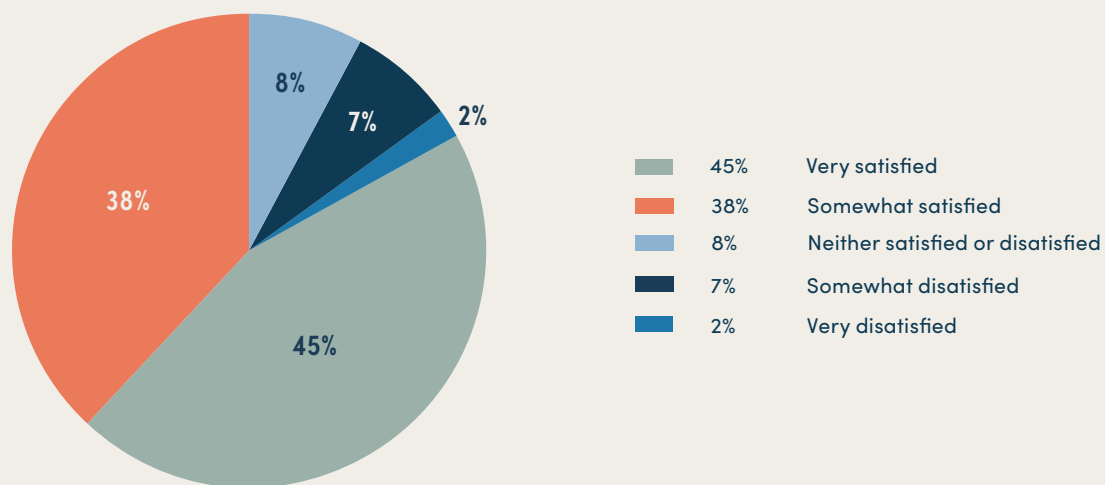
If the FCC permitted your organization to share Internet access off-campus, in your community, at no additional cost to the E-rate program, would you take advantage of this opportunity?



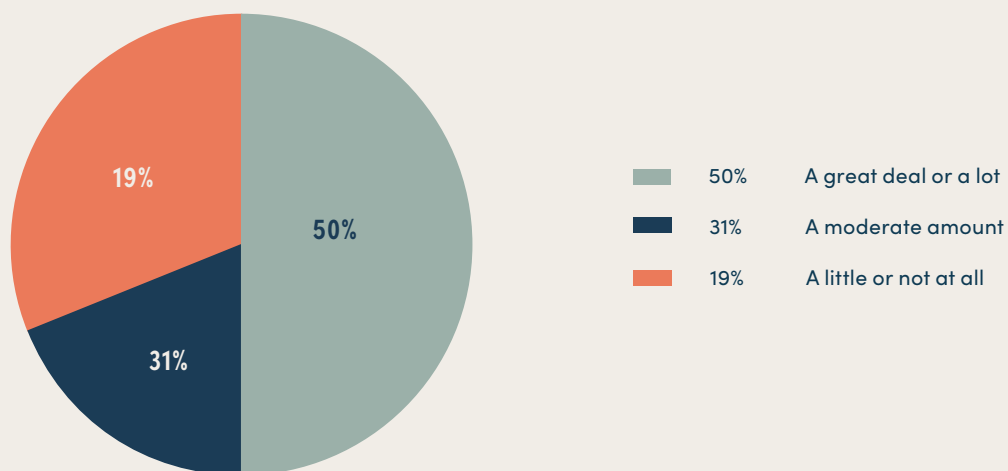


USAC

Overall, how satisfied or dissatisfied are you with USAC?

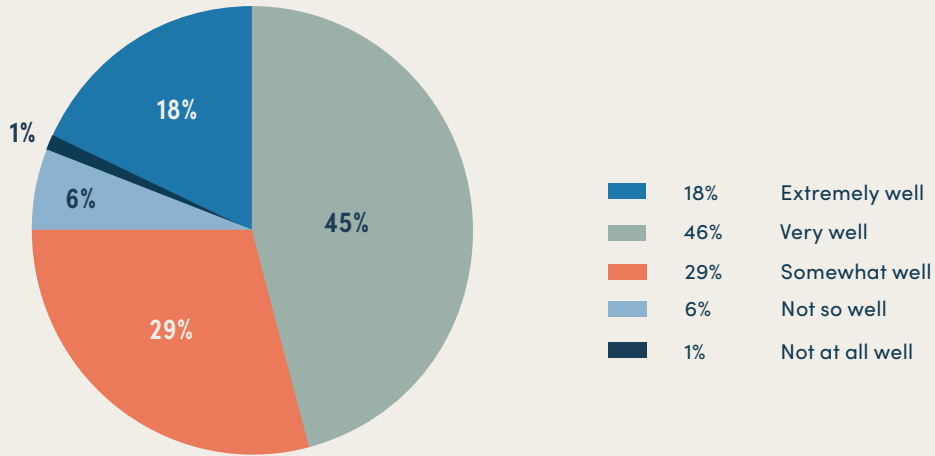


To what extent does USAC care about your individual situation?



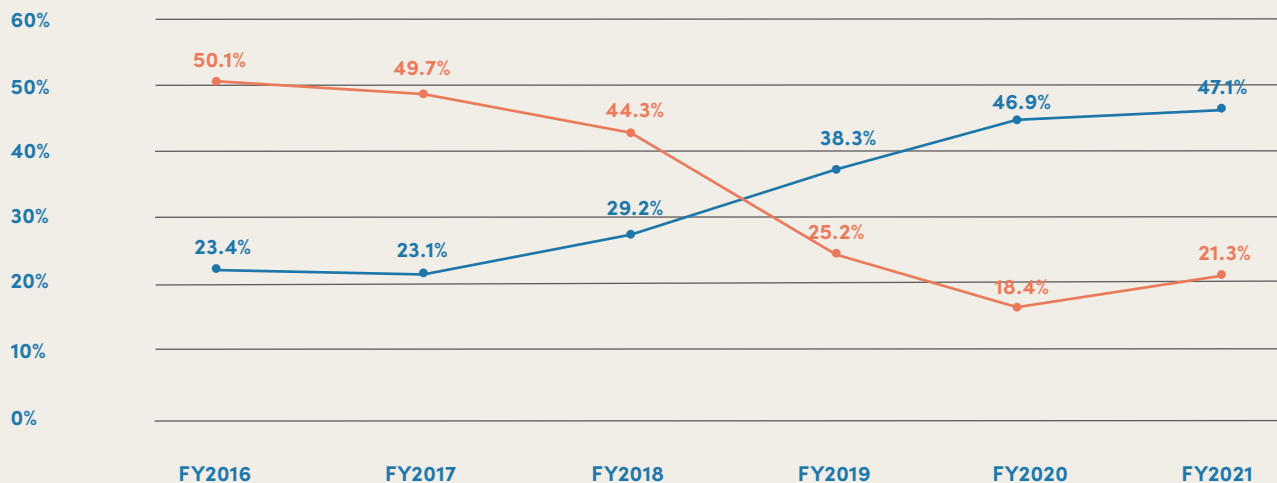
EPC Portal

Overall, how well does the EPC portal meet your needs?



How would you rate the EPC portal in terms of overall ease of use?

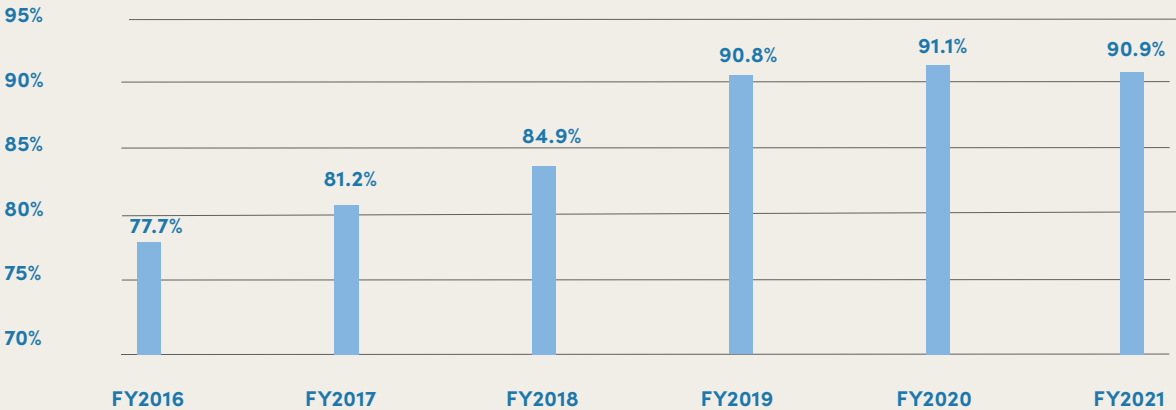
Very or somewhat difficult
Very or somewhat easy



FCC Goals

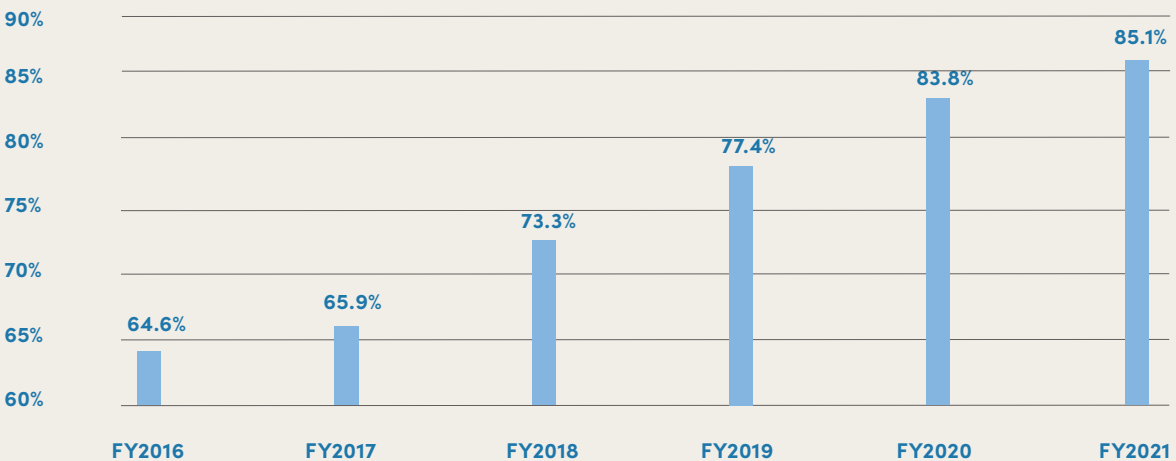
Goal #1:

Ensuring affordable access to high speed broadband sufficient to support digital learning in schools and robust connectivity for all libraries.

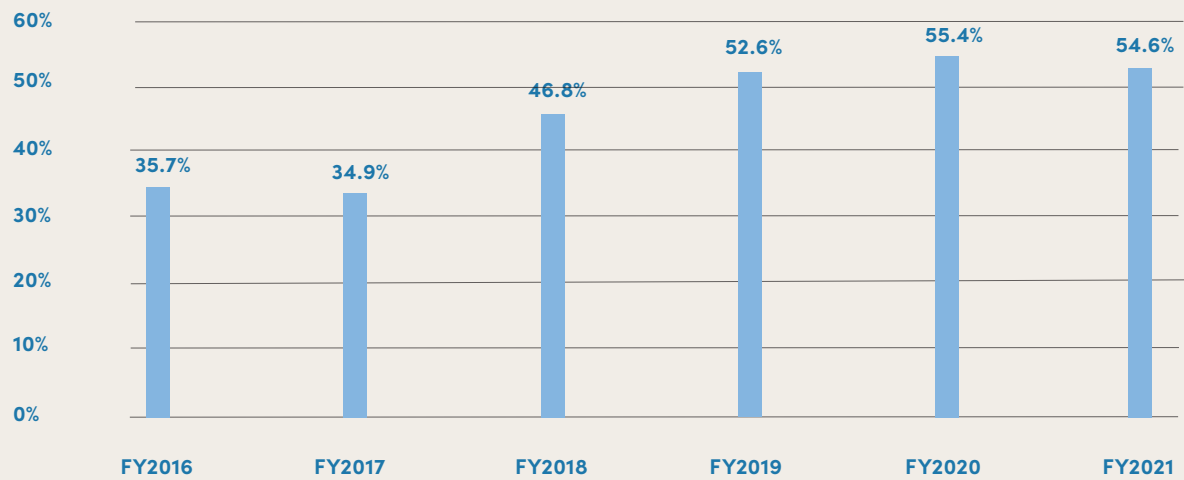


Goal #2:

Maximizing the cost-effectiveness of spending for E-rate supported purchases.



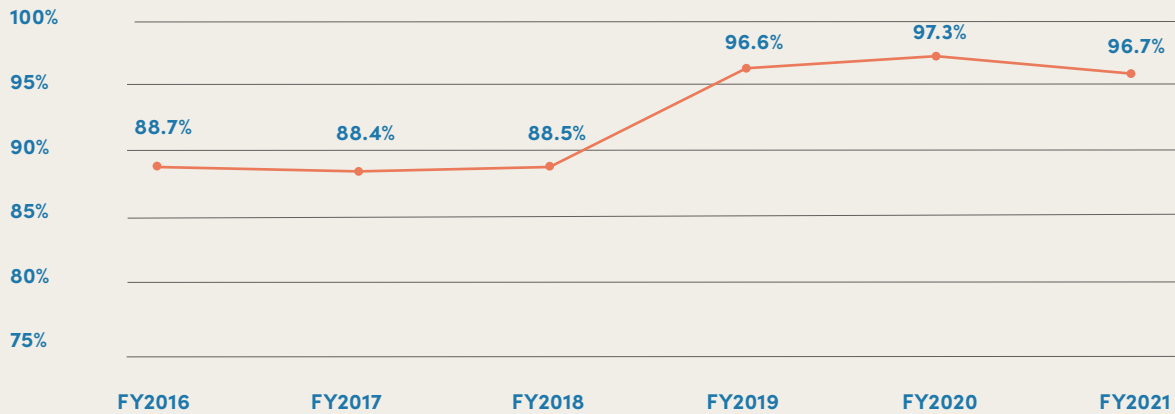
Goal #3:
Making the E-rate application process and other E-rate processes fast, simple, and efficient.



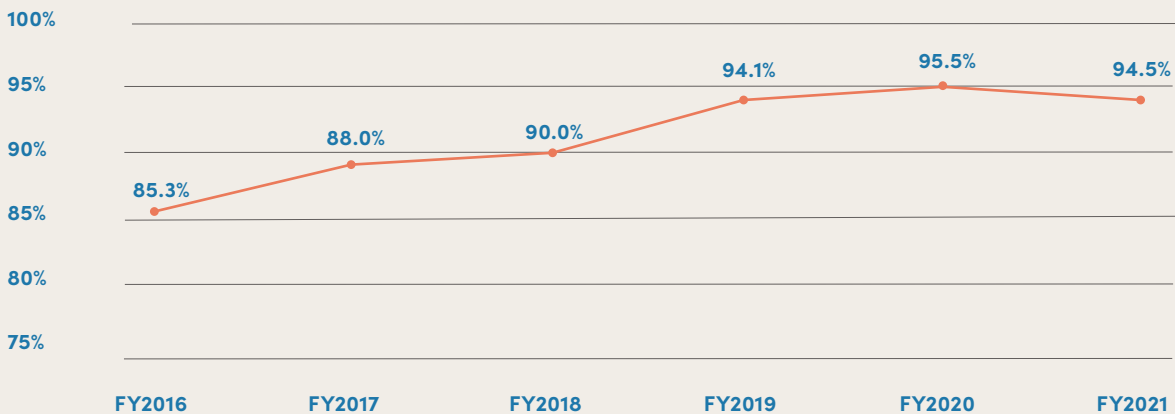


Program Impact

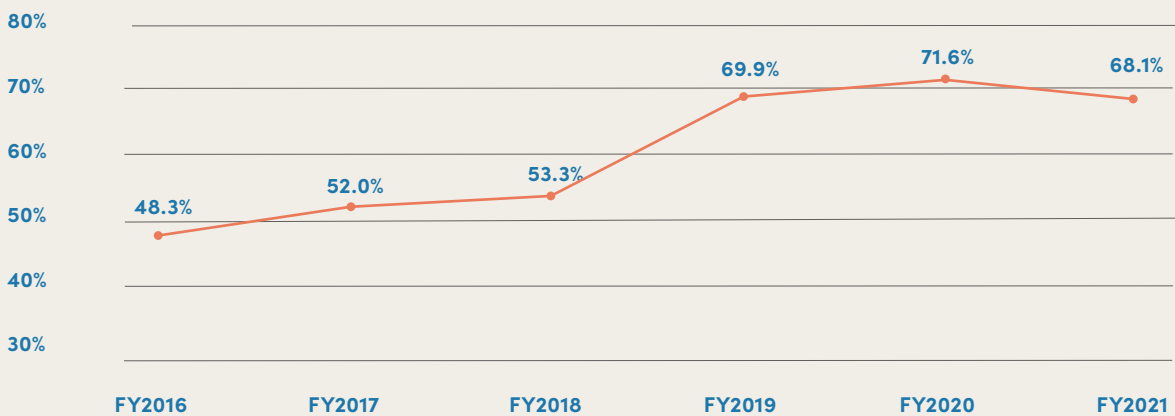
We connect more students and/or library patrons to the Internet because of the E-rate program.




E-rate funding is vital to our organization's Internet connectivity goals.



The E-rate competitive bidding process lowers our prices.



A window with a view of trees and a white curtain on the right side.

We pause to honor the
educators, librarians,
and public officials who
bravely navigated this
academic year, ensuring
continuity of learning
despite an ever-changing
landscape. Thank you for
all you have done to help
us move forward.

Thank you.





2021 Open-Ended Responses

The voices included in this report are highly valued. We thank survey respondents for voicing their honest program feedback. These voices offer gratitude and convey unique challenges faced to meet connectivity needs of schools and libraries.

E-rate funding request data are publicly available and provide unique insight into the communications needs of schools and libraries. The data include each applicant's name, location, service provider, E-rate discount rate, accounts of lines and equipment, as well as speed of connections and model name(s) of devices.



- | | | |
|---|--|---|
| <ol style="list-style-type: none"> 1. Rural schools have next to no choice for Internet providers. 2. Staff has been incredibly helpful. As a new user without any training, I found the enrollment process cumbersome and the systems were not intuitive to determine which forms to use and how to submit them. 3. Please make the application process simpler. We shouldn't have to hire consultants to help us fill out paperwork. 4. We greatly appreciate the E-rate program. Thank you! 5. E-rate funds were a great help to face off the challenges presented by the COVID-19 pandemic. 6. The LCT program we have helps with the consultants to help walk us through the process. 7. Please fund Internet filters 8. Thank you very much for the opportunity. That is very important for our students. | <ol style="list-style-type: none"> 9. Thank you to the E-rate program and the staff that have helped our school in so many ways. 10. Your workers are awesome helping us through but your website and process are confusing. 11. Make the application process easier. Currently, we need to fill out multiple forms, a BEAR, etc. It's a lot of information for libraries to track down, especially since city libraries have to go through their IT departments just to get this information. 12. I am a "seasoned" public library director and have never found the application process to be intuitive or easy. The EPC portal is VERY confusing and needs a major overhaul. When you have individuals who become "E-rate Consultants" and libraries pay good money in the form of giving up a portion of their E-rate discount, that proves the application process is overly complicated and time consuming. I'm applying again this year as I'm at a new library. At my previous library, we opted to forego | <p>applying for E-rate funding because it was not worth it. The hours I was paid to spend working on the forms equated to almost as much money as the E-rate discount would be for the library! Our library system used to host free E-rate workshops in computer labs where a consultant would lead a group through the process for each of the forms--470, 486, etc. This was very helpful but the workshops are no longer offered. If USAC could offer virtual workshops of this nature, I believe many would take advantage and benefit.</p> <ol style="list-style-type: none"> 13. I am very pleased with all aspects. 14. The application is DO CUMBERSOME and NOT user friendly. 15. The interface is not very intuitive; once you figure it out it is fine; but it needs a lot of improvement. 16. I find applying for E-rate and using EPC difficult. I am not sure why it is so complicated. I have access to a consultant who has helped me with several steps during the process. |
|---|--|---|

I have applied three times. My library patrons benefit greatly from my efforts but I don't even know if I could apply successfully without the help of the consultants. The librarian in this position for many years before retirement did not apply for E-rate, perhaps because of the difficulty.

17. I hate having to change our password almost every time I need to access EPC. It's time consuming and frustrating. I also wish it was easier to file forms 470 and 471. Knowing how to word certain requests is difficult.
18. Really need discounted device support of students and teachers use.
19. I really find your website very confusing. You could add clear buttons for "just renewing" path versus "applying for new services". Just an overall redo of your site by someone with consumer experience. Seems like the whole site was designed by programmers or an 80-year-old beaucocrat. Thanks
20. Would love to see security cameras and door access added to the E-rate program.
21. E-rate program services have always been crucial for operations, never more than now, the need will only increase in the future.

"E-rate program services have always been crucial for operations, never more than now; the need will only increase in the future."

22. Logging is impossible. If we are audited, the link does not go to the correct page and is very difficult to find. It almost costs us more in time and effort than what we get. Changing password every 2 months and jumping through the hoops is not worth it.
23. Overall we are happy with the E-rate program and it has been a great source for my school who can use all the support they can get. The only thing that has been a struggle this past year is getting customer service on the

phone. I like to talk to someone in person not through text on the EPC portal. I also get frustrated when I have already proven things through inquiries for Category 1 and then get the same exact inquiries for Category 2 for the same School. Can't they see what was already uploaded? Or at least be trained to look in other inquiries that may have been completed for that school and funding year before asking the same question again. That is very annoying and I would reach out to the person who sent the inquiry but they just apologize and tell me I have to answer it anyways because it's already out there. They can't retract inquiries? This is something I would just train for them to look into before they send inquiries, it could save a lot of time and make the process even quicker if they already have the evidence they need.

24. This is a very important program for our district to provides services to our students and staff. Thank you for continuing to fund it.
25. The EPC site is not user friendly or intuitive. the user experience is not friendly. In addition the PIA process is ridiculous, takes too much time and the reviewers ask the same questions over and over rather than explain why the previous response is not sufficient. It is a dreaded process. Similarly the bid process is absurd, its like comparing apples to bananas because every vendors quote format is so different, I have no idea if I'm getting a good deal, I typically select based on familiarity with the company over price.
26. Overall the E-rate program is a critical part of our long term strategy for a digital learning environment in education. I would love to see the services eligible for E-rate be expanded.
27. The appeals process should be more fair and truly consider individual case circumstances instead of just taking the approach that "rules are rules and cannot be broken," especially in the case where funding was already committed but a deadline was narrowly missed.
28. The USAC website is extremely difficult to use, and does not have

any explanations of what certain terms mean. Not all companies use the same terminology as USAC, and trying to figure out different terms is extremely difficult. There is NO support from USAC when filling out forms, and any support that is requested is not responded to. Someone needs to streamline this process.

29. EPC needs to be easier to use. Eligible Services list can be confusing.
30. Our library's Wi-Fi connection is extremely important in our rural community. In our area, there are many dead spots where Wi-Fi cannot be received and Internet providers are sparse. Our community depends on our Wi-Fi connection and digital devices for their digital needs, which are increasingly important in daily life. Access to a reliable Internet connection is no longer a luxury- most jobs, courses, and other aspects of life are accessed via the Internet.
31. I find EPC confusing and difficult to use.
32. We appreciate the E-rate program that provides leased WAN Internet connection services between 4 of our library branches- without this assistance, we would not be able to afford it. Self-provisioned networks are initially expensive, but overtime are much cheaper/ and a better use of FCC funds than a leased service. I hope that USAC will continue supporting self-provisioned networks!
33. Our small town was disappointed when phone service was phased out. Those discounts were important for our local budget.
34. Just so thankful that this is available.
35. If it were not for the E-rate program, our rural library would not be able to provide Internet access to a large majority of people in the area who cannot afford Internet and/or the equipment associated with the service. It is vitally important for us to be able to offer this.
36. Our libraries do not filter and are not CIPA compliant and therefore we are very limited on what type and how much E-rate funding we

can apply for.

37. Over the years, E-rate has improved it's process. However, district in rural communities still have difficulties sustaining core infrastructures growth. Servers, network switches, Wi-Fi, and cabling continues to cost more and more every year, however E-rate dollars do not go far enough. Our cabling was done 20 years ago and the cost to update it will consume our entire budget. Cabling should be in it's own category outside of a budget (it's not often used but costly when it is).
38. The application should be easier to read and provide a better understanding to what the question is really looking for.
39. The ease of using the EPC portal has improved over the last several years.
40. The EPC site is NOT intuitive. In fact, it is a nasty, cranky beast. The signed contract must be added before you start the Form 471. Easy would be having a drop box as you complete the Form 471. Every time I use this portal, I have a colleague from the Department of Libraries help me. I have been doing this for 7 years. The screens are not user friendly. The sequencing for what needs to be done next on the screens is horrid. You should always read down, but sometimes they have things off the the side. There should also be a list of approved providers for each state, so we can double check who is eligible.
41. The dashboard could really use a "how do I " search box.
42. The E-rate program allows us to be there for so many in our community that do not have Internet access. Many come in the library to look stuff up and to print out applications. We are thankful for the E-rate program.
43. The review process is still cumbersome. I get asked the same questions every year for the same requests. Internet needs to be covered for at home as well. VoIP services should also be covered at schools (not cell phones or pots lines)
44. The forms needs to be easier to fill out. I have to get help each year from Department of Library because the forms are so confusing. Also I don't like the E-rate system to throw my pass word out for the year. It should be the same the whole process. It makes it harder to get a new password every time you need to get into the portal.
45. Without E-rate we would have to make substantial cuts in other areas of library services to pay for Internet.
46. The two most frustrating parts of the E-rate Program for me are finding information on the USAC website and access to upstream decision-makers at USAC. Forms are the easy part of E-rate. I need easy access to rules and information regarding my applications. In unique situations, it would be helpful to be able to access decision-makers at USAC for discussions. They are "hidden" behind the HelpDesk and are rarely accessible with the exception of the annual in-person training sessions.
47. We as a district appreciate the services we receive as a poor rural county.
48. It would greatly help our district, which is comprised of small rural communities, if E-rate also expanded into funding for student end user devices.
49. Due to the increased reliance on Internet for the instructional process, FCC needs to understand the importance of fail-over connections for ensured connectivity.
50. We are very happy to offer fast Internet service thanks to the E-rate program.
51. PIA reviewers have difficulty explaining in detail what they are actually asking. Post standardized inquiries, but not clear on what they want specifically.
52. While our small community, under 1,000 population, does have one company providing what I would call a fair Internet source (I think probably a decent price but what is as important or more - no contract) many of our patrons still cannot afford home Internet. Most of those may have a cell phone with some data but it is usually insufficient for many needs. Filling in job applications and accessing websites, including many social service sites, is still not easy to do on a cell phone. E-rate funding, for both our in-library public stations, Wi-Fi, and Category 2 needs, is vital.
53. EPC is terrible to use. It is not intuitive at all. The whole process in general is clumsy and unforgiving.
54. We are thankful for this essential service. Our patrons lives are impacted in a very positive way and we are appreciative!
55. We are currently not using Category 1. The City ran fiber to the library and bundled us into their service plan. This plan for all city offices is less than what the library was paying. To get this rate, the library cannot be separated out. So at this point the city is covering the full cost.
56. The public library in my town would not be able to afford the equipment that it has nor be able to afford the high speed Internet if it were not for the E-rate program.
57. The EPC portal is really difficult to navigate for those of us that only do it to meet the application requirements and management process.
58. Without E-rate we would not be able to afford having Internet in our library. Without Wi-Fi our patrons would not be able to home school, work on their small business, especially during the Pandemic.
59. We appreciate the E-rate support for our rural library.
60. We feel very fortunate to have the E-rate program. It meets our needs very well.
61. I think the use of plain language would significantly increase the usability of the application, as would more in-application explanations and a more logical/intuitive menu.
62. These are vital services to libraries and schools. It is important to provide these services to rural areas where services are limited in their areas.
63. E-rate enables our library to have more and newer computers for our patrons and faster service with a fiber optic line.

64. EPC works well once you are in but the multi-factor authentication does not always work and can be very frustrating
65. We appreciate everything that E-rate provides our district.
66. I need something to pick up the excess after E-rate.
67. Having to change passwords every 2 months in the EPC portal is unnecessary. Even 6 months since we have two-step authentication now. Having used the EPC portal for several years now, it's okay but for a newcomer it would be a learning curve. Not much online help when you're right in the EPC. It's difficult to find where the PIA questions are and how to reply to them - certainly the first time you have to respond. It took a call to CSB to figure it out for me. The length of time it takes USAC to complete PIA reviews and get back

to the applicants is often quite inexplicable, and also inefficient, not respecting the applicants' time, planning, and energy. Sometimes an application is not even funded or denied during the funding year! This is remarkably inefficient, leaving the applicant in the position of having to apply for the same thing again in the next year's window. Truly a waste of time and disrespect for the applicants. I know one case where a bunch of schools and libraries submitted a large application for a high-speed network, received a few PIA questions, replied, and was still kept hanging throughout that year - and the next one!! No feedback. Application wasn't funded or denied, and so much effort had to go into applying yet again. That shouldn't happen. Get the PIA reviews done in a timely manner and either reject or accept applications efficiently. Another

case of a BEAR form in review - all supporting documents were sent in, but still no response 6 months later and no reimbursement as it's hung up in the review process. This again is really inexplicable, leaving the applicant to wonder if the paperwork got lost or set aside, if the reviewer left USAC. It is still a problem that the CSB will give different answers to the same question based on the knowledge or conscientiousness of the staffer. It's a major concern how USAC is ever going to efficiently handle the \$7.1 billion+ of the ECF, since they struggle now to get funding of the regular E-rate program out to the applicants, with often long delays. Now we will probably witness a burgeoning bureaucracy and new staff to eat up a large part of the funding, with lots of untrained and disengaged people who are not deeply committed to fulfill the goals of the E-rate and



ECF programs. We will probably see the usual government inefficiency and waste so common among gov't agencies. Loss of telephone service continues to negatively impact the budgets of many schools and libraries in remote, low-income areas. It would be great if VoIP would be encouraged or some funding for telephone service restored. Given these times of cyber attacks and piracy, with school and library records vulnerable and people's privacy threatened, USAC should encourage and fund efforts, software and equipment that enables strong network security.

68. Our school could not serve students beyond paper/localized resources without the help of E-rate funding. The growth in digital content and electronic activities for core instruction is creating relevance to how we educate and new purpose as to what it means to be educated.

“The growth in digital content and electronic activities for core instruction is creating relevance to how we educate and new purpose as to what it means to be educated.”

69. This is a really Great Program. Because of this program, I have been able to maintain a up to date and stable infrastructure for my school district.
70. Network security is a must and unfortunately extremely expensive. It may just be the #1 threat to providing a digital learning experience/education.
71. I have marked low of the use of the portal because I believe it is very confusing. One has to jump back and forth adding items in order to complete forms. This money is for libraries to use to help lower costs in order to provide access to our customers and should not require a dozen hoops to fill out. If we need three switches or a firewall that cost \$1,500 for instance that is what is needed regardless of make, model, where we get it, or if it goes under connections, network, wiring, or

maintenance. If an item cost over \$30,000 per our procurement code yes it should require a bid. A \$300 UPS should not. I will admit it has improved over the 20 plus years it has been in existence and we could not do what we do without it, but it still needs to be more streamlined where everything can be done in one spot. One instance is that you have to go to one area and enter all the items you wish to purchase one at a time, and then you have to take these items and attach them to another form. If we did not have our state library E-rate person on hand I am not sure I would ever figure out how to do it.

72. USAC could give better simpler definitions/rules.
73. The peer review processes should allow for conversation. I've never been called directly when a verbal explanation could have cleared up confusion about an item. Instead I provided what proof was requested and then was denied when it was an eligible item. My experience with appeals has never been good.
74. E-rate Overhaul - E-rate funding would continue to be based on Free and Reduced Lunch percentage for schools district would be notified each year by January 1, the funding they would be allocated for the upcoming school year districts would be allowed to use E-rate funding in an unrestrictedly manner. Funding could be used for technology related items (Internet, hotspots, switches, Wi-Fi, devices, cyber security, classroom displays, sound amplification systems, VoIP Phones, etc.) or even for additional Technology staff. Districts could purchase these items via contracts, bids, quotes or directly as long as they followed their district and state guidelines. Districts would then submit copies of the paid invoices to USAC to be reimbursed.
75. In view of the vulnerability of secure networks to hacking, cybersecurity measures should be covered by E-rate.
76. E-rate is great, but it would be nice to cover redundancy and mobile hotspot Internet for students.
77. The process is very cumbersome -
78. Whenever I have needed help or questions have been

asked concerning our library's application, the E-rate people have been very helpful and kind to us not too techy librarians.

79. With the push for cybersecurity updates in school districts, I believe firewalls, security devices, and security software should fall into the realm of E-rate. I also believe it should be allowed to have dual Internet, due to online testing and most curriculum is based online.
80. We are very appreciative of the assistance we receive through E-rate.
81. EPC is great but kudos to the support we get every time we need assistance. These people are on top of the situation, they try hard to understand and they do their best to find a solution! I am always thankful for them!
82. Servers should be covered under E-rate Category 2 as most organizations use them to provide DNS and DHCP. Both of which are required to get devices out to the Internet.
83. Inclusion of servers would be extremely beneficial.
84. Connectivity to residential areas inside city limits and rural areas (where our students live) would help schools through the new normal of the Post Pandemic.
85. Because so many services are required to get someone connected to the Internet, and there are several more additional services required to meet CIPA requirements, etc., all those services should be eligible. Critical services, such as multiple firewalls, content filters, and dual Internet connections, should also be eligible because maintaining expected uptime requires designing a system without a single point of failure, i.e. N+1 where N is the minimum number needed. If you only have 1 firewall and that firewall fails, you don't have Internet, so you buy two to have a fail-over or to load-balance, but that second firewall or second Internet connection is not covered. The goal is to provide a robust and reliable connection to the Internet. Fund all the things are required to make that happen.
86. Make the process simpler--the governmental terms and names are

confusing. Keeping track of which funding year we are in is confusing. Following up when staff changes at schools is hard if not impossible. It is difficult to know how to make sure the process is carried out thoroughly. Small schools do not have E-rate experts.

87. You have got to begin supporting cybersecurity needs. Schools simply do not have the budgets to deal with this and so many things are going undone because of it. We need staff and dollars to meet the threats that are a constant.
88. Get a better list of Category 2 that should be Internal versus basic maintenance. Still a lot of confusion over how to categorize certain Category 2 equipment and licenses. We should have this solved by now... Allow multiple funding years for Category 1 multi year contracts. Save on reviews and save on applying for the funding.
89. This is very hard to fill out by myself. I always have to get help from a consultant to fill out the forms and I don't like every time I go back in to the portal I have to put a new password in. You should be able to use the same password for that year. Very frustrating. This should be made a lot easier to use.
90. When applying for E-rate funding it is a difficult process that we have to go through. It needs to be simplified more.
91. Hotspots for students should also be an eligible E-rate expense. Cybersecurity costs (audits, monitoring, training, professional services, etc.) should also be E-rate eligible.
92. Network Security should be included.
93. I think that the E-rate program has been a tremendous success. I really feel we need to add more capabilities to it though and allow for additional funding for more projects. Failover or dual connectivity would be a huge step in adding more Internet connectivity for schools.
94. The knowledge base portal used to be easy to find documents we needed to fill out forms. Now it is impossible and what I do find, seems to be very limited in information. And when we call for

assistance, they answer quick (that is great). But, they always seem to be in a hurry to get me off the phone. Usually they can't answer my questions very well.

95. USAC holds tight on their processes and only through E-rate consultants can we glean what the fine print on processes are. They need to published on their site for all categories of services. Every process and regulation needs to be published. How they approved and decline needs to be published. The 470 and 471 forms need to be reworked. They are complicated and do not allow for all situations to be documented correctly.
96. The navigation in EPC/USAC is clunky. To return to a former screen you have to start all over. A way to move back a screen would be a nice feature. The reviewers questions are often confusing, and when we only have 15 days to respond and then it takes a month and a half for the review to look at the response it feels like we're spinning our wheels.
97. We find the application process is very confusing and we would appreciate due date reminders.
98. Just covering the Internet is not enough if you don't have the money to cover device i.e. laptops, desktops, ipads, Chromebooks etc etc
99. Nearly every facet gives advantage to schools who have resources internally or are able to hire consultants to tip funding in their favor. I also see many products purchased with nice but unnecessary features. The timeline and reliability of funding is more than inconvenient for a short project timeline and windows of opportunity to implement without disruption.
100. I need door and camera security systems to be eligible under the E-rate program. It's time!
101. The E-rate program needs to be managed at the State level, not the school level. Smaller schools are negatively impacted as they don't have the technical staff to maintain and service connectivity and computers.
102. When I think back to the first times I applied for E-rate it has improved

tremendously. It is still a little bit awkward and confusing, but continues to improve.

“When I think back to the first times I applied for E-rate it has improved tremendously.”

103. Need better/more full eligibility for UPS/Power systems... these are absolutely necessary for a good network, but become cost prohibitive due to USAC not allowing them as 100% eligible and not paying for the network interface cards on them. Yearly costs for network controllers/ management also should be 100% eligible - having/using these will often reduce the long-term cost of ownership (rather than having to replace items more often).
104. Thank you for your help.
105. Please, please put cellular service back into the program. This is essential to our operations and your continued neglect to recognize this just emphasizes how out of touch you all are with what happens in rural America.
106. USAC is terrible!
107. We wouldn't be able to offer the services we do without E-rate, but I wish the process were simpler.
108. During the pandemic, our library system increased the library building's Wi-Fi coverage area to better serve our communities in a critical time. After being praised and encouraged through articles and training opportunities, our library system is now penalized for broadcasting the Wi-Fi signal off-campus to neighboring community institutions such as school and courthouse parking lots. It seems counterproductive to champion and encourage library leaders but later reprimand the same library leaders who fulfilled crucial needs during a time of great distress. While the cost allocations do not directly impact library staff, the limitations send a message to library staff to tread lightly with future endeavors and innovation is not necessarily a priority for the FCC. Fortunately, my staff, Board of Trustees, and the entire team

- are forward-thinking and realistic regarding fiscal responsibilities so my library system is prepared to bear the burden caused by the ineligible service fees, especially if our experience can benefit other libraries in the future.
109. In this day, schools need help with combating cyber attacks of all kinds. Most schools barely have enough technicians and cannot afford a cyber engineer. Help with cyber protection as a service would be very useful.
110. The lack of technical knowledge by the reviewers/auditors can be very frustrating at times, it's hard to explain the roles/purposes of some services and equipment if the reviewer doesn't understand the technology. Also inconsistencies between reviewers/auditors wastes time and effort.
111. Without this program, we would be behind the ball on network connectivity. I'm so happy it was renewed for another 5 years.
112. The E-rate Program has absolutely made the difference in the use of technology in our school system. I have been here since the E-rate program began. We could not have had decent Internet without it. Now our students have very good Internet at school but many still do not have Internet at home. We used ESSR funds to purchase hotspots for during Covid 19 crisis. These have been incredibly valuable to our students. I would like to see E-rate help support these on a regular basis. I would also like to see E-rate support Internet filtering. We are required to be CIPA compliant - it makes sense to me that E-rate could help with the cost of doing that.
113. EPC has made everything easier -- thank you for investing in that system!
114. Internet security is a huge cost and increasingly critical. More sophisticated solutions that include telemetry are expensive. Less expensive protection that only works per device are not capable of identifying threats to your network.
115. Cellular enabled devices (hotspots, laptops, tablets, etc) and their service plans used for remote learning or staff connectivity should be covered by E-rate
116. The requirement to keep devices in service for 5 years is cumbersome. We purchased EOL wireless equipment which is severely hampering ability to adopt 1:1 learning. We are stuck with these 15-year-old technology based APs for another full year before we can legally replace them. It would make more sense if the 5 year requirement could be pro-rated, to give us an outlet in these situations.
117. Some of the terms used are confusing, especially when looking at the types of data connections and the distinction between BMIC and MIBS.
118. Providing support for Internet access via cellular services when all telco services have been ineligible for years is very disturbing. Telco services that support emergency and network security services to all district buildings and resources are all but required in today's world and should also be supported as they once were.
119. Content filtering would be a great thing to add as well as service involving Security for networks.
120. Please consider cyber security as an E-rate eligible service. This is absolutely critical to maintaining the safety of our students and their information.
121. I fill out everything that I am told I need to fill out and I still never get the reimbursement. Every year I get a funding commitment letter and no reimbursement!!!
122. We had a major issue with applying for funds this year - I believe it has been worked out but I guess we will have to wait and see. I find the whole application process confusing and difficult. There are too many different parties involved and communication between them is at times extremely difficult. But I am thankful for E-rate because without it we could not fulfill our mission
123. Vital to our community.
124. It is very important that funding for Cybersecurity for Network is included in both E-rate Categories.
125. Add VoIP as Internet access is available and VoIP would just be an add on service.
126. Hotspots should be E-rate eligible
127. With growing cyber threats, it would be nice if endpoint protection and EDR software were covered. Its great to have Internet, but without protection, it is also scary.
128. Grateful for your services and professionalism
129. I have been filing E-rate since year 1 and it has gotten progressively easier over the years. We could not offer the level of Internet that we currently offer without this assistance.
130. Consistency in the drop down options when loading in 470s vs. 471s. I would label something as a UPS/Battery in my 470 and then in the 471 there was not the same option so I had to explain in my narrative. Have not received FCDL to know if that worked but it was difficult to navigate especially when you call into the customer service line and they say that they don't see what I see so they are unable to guide us through it.
131. Even though bids are competitive vendors are not giving the best prices. They are bidding on their E-rate prices. If I did not use E-rate for my last switch update the bottom line price would have been much lower but because the companies know we are only paying a percentage of the cost the bids are inflated a bit. With that said the cost to my district for the switch upgrade was way less than if I went out on our own and did not use E-rate. But with the inflated E-rate prices on switches, my Category 2 dollars do not go as far. Twelve years ago before the change in Category 2 budgets I was able to get 67% discounts on switches with vendors knowing I was using E-rate I was only able to get 50-53% discounts.
132. I have been filing E-rate for my schools since it started in 1998. The process has definitely improved but as I'm training my replacement (who doesn't have a tech background but is an accountant), it is a bit daunting with terminology. Fortunately, we have an amazing state rep who does a fantastic job of supporting us. She is always willing to take our calls and guide us through the process.

133. EPC is not user friendly at all.
134. The barrier to increasing our Internet bandwidth is the reimbursement process. Eventhough we are reimbursed, we do not have the cash flow to afford to increase bandwidth. Monthly or even quarterly payments would help this.
135. I would love if we could get E-rate for content filtering. It would allow us to dedicate more funds and secure a more robust solution than we currently have.
136. I think with the rise in cyber attacks on schools and fact that many schools are getting their cyber insurance dropped I feel cyber security hardware and software should be an allowed Category 2 option. I think the management by a 3rd party should also be an option for cyber security.
137. The webinars and the information you sent periodically about the E-rate Program, new funding opportunities and the announcements for open windows for the different forms application is very useful. Thank you.
138. The portal is difficult to navigate through, but the response from customer support is always exceptional.
139. Our out of pocket fees to have our Internet provider upgrade for E-rate has been large hit this year to our budget.
140. The Category 2 review process has become increasingly long and redundant. I had 4 or 5 different reviewers this year, some asking for the same information that was provided previously or already provided in the original 471 submission.
141. There is a huge need for dual Internet services for load balancing and failover. E-rate should assist in covering these costs. VoIP should also be covered since the traffic passes through our existing broadband networks. Classroom to classroom/classroom to admin calling are vital safety needs for our student population. This communication tool also goes hand in hand with the district's communication network.
142. E-rate is fabulous for stretching our small budget. We've used both Category 1 and 2 and Special Construction for 2021!
143. While USAC seems to be improving on their review and commitment process, the CSB is woefully lacking in their ability to respond to a majority of cases, but instead "escalates" them to the Internal Processing department where they languish for months at a time with no response whatsoever. This issue needs to be addressed and resolved.
144. My Category 2 application has been listed as being In Review for 62 days. I opened a case with USAC, and the only answer they give is that they can't review everything at once. Last year, my application was in review 9 days, and that included my response time to their inquiries. This is unacceptable. There needs to be better transparency on the part of USAC.
145. We need a shorter process. Requiring us to bid out technology a year in advance is not practical. Many times we need something faster.
146. I still believe that this should be used to provide connections, whatever the mode.
147. PIA reviewers are out of touch or don't have access to FRN history. I've been asked to supply contracts for multi-year services after year 1, when the contracts already exist in EPC, and when the previous FRNs were approved. PIA reviewers often ask for copies of the same evidence, multiple times, and with multiple agents. This review process is often frustrating and inefficient.
148. The portal is miserable to use
149. #1-Firewall hardware and services need to be addressed. Currently, the hardware is eligible for a full discount, however, the UTM or NGFW services and functionality that is critical to the overall operation of the hardware is cost-allocated out, which is unacceptable. The piece of hardware is absolutely useless without the cyber-defense suite of products that run on top of it. This needs to be reevaluated and prioritized given the state of cybersecurity and the negative impacts that a data breach or a ransomware attack can have on a district. #2-Bids received through AI functionality need to be addressed as well. These types of bids should not be considered legitimate and should not be required to be included in our bid evaluation process. For example, I had a bid for over \$100,000 that was generated by AI technology and another for \$11,000 for the exact same project. The selected vendor, who accurately bid our project, landed in the \$50,000 range. Luckily, for me, there were only two, but this could get out of hand if I were to have received 10 or 100. There should be a human being reviewing our 470s and then making real-world decisions in designing solutions that meet our bid requirements. Thank you for hearing our concerns and for taking our needs into consideration!
150. The EPC is slowly getting easier to use but it is still not intuitive. The closure of the administrative window makes it really difficult to get correct counts and organizational relationships correct when needed. There is little guidance for consultants on their web page in terms of how to get your consulting number or get an organization assigned to you. Thanks for asking! And for your webinars and other support.
151. The review process is ridiculous and arduous
152. SaaS-based firewalls and SD-WAN should be part of Category 1 services now that many ISP's offer these as part of the primary Internet bandwidth services bundle.
153. Because of Covid-19 some low income families are switching from our private school to public schools. This situation affects our poverty level and E-rate funding. I am sure there are a lot of other schools that are experiencing the same situation. E-rate should consider this situation to help private schools, not to decrease % of funding.
154. The current EPC is very cumbersome. Finding, documents like contracts, are difficult to find and the location of their storage on the site make no science.



155. Mandated software for website filtering is unfunded.
156. We strongly need E-rate support or network security such as IPS and IDS systems and network monitoring tools. We also need support for cloud-based security cameras to meet our mission of providing a safe environment for students.
157. BEAR NL's should be sent electronically not in the mail.
158. They continue to make improvements, but it's still cumbersome.
159. I indicated telephone should be available for funding. I believe that should be at half the rate for Internet so that institutions will pay attention to changes in technology that encourage cost reduction.
160. It just seems like the items we really need sometimes are not covered. Failover Internet, third party hosted Wi-Fi. Voice over IP phone system. Things that are critical to the business and have significant cost associated.
161. DDoS needs to be included in category 1 services
162. Internet filtering should be included.
163. Backup should be eligible
164. In order to continue to maintain robust networks, we need to protect those networks from cybersecurity threats. There needs to be a way to fund cybersecurity tools for schools. They are so expensive and offsetting that cost with E-rate funds will help us ensure we keep our networks up and running for students.
165. I wish there was still some support for the computers and servers themselves. High speed Internet does us little good if we can't afford to keep our equipment up to date and being a small rural library makes it difficult to afford the equipment that can handle those speeds.
166. This funding has made it possible for our school to continue to grow and make available Internet options for our students and staff.
167. We are blessed to be able to utilize E-rate funding to provide

infrastructure updates needed to support needed network upgrades

168. It does not help for the school to have broadband when homes have no access. We have been 1:1 for over 10 years but no access at the house is counterproductive.
169. I have used EPC for the past 4 years with eventually great success. It took a year to understand the process better and with the help of support, now I have an easier time applying for funds from USAC. Support personnel are a great addition to the process. They offer a needed assistance when applying for a piece of equipment or service which I had not done or it had been a while since I had done it. I know the EPC site is a continued work in process as design and flexibility change. You have always tried to make it user friendly. Thank you
170. I think that the E-rate program should make special considerations to all applicants especially during this pandemic. Some states and territories are having difficulties covering local share with the drop in economy. Also during this pandemic, I think that E-rate should keep the application window open year round and have applicants apply for discounts even when the funding year hasn't started. Some of us applicants made errors and now can't apply for the discounts. E-rate should consider maybe just extending the previous funding year without having to apply. Then next year when we see everything is settling down, if it does, we can re apply. This has been a burden to our school district and we need the assistance. Also, waive the local share would help. At least for one year.
171. Help with student home Internet access would be a big help. We use hotspots currently for those without home Internet access.
172. A lot of compliance paperwork and processes involved. Taking up a lot of employee's time across different departments. Overall great programs and we are very grateful.
173. I have been with E-rate from the beginning. I now find my E-rate process scarier than doing my taxes. I am always worried about missing deadlines. I have suggested that the district hire

a consultant, but that is just an additional expense and we still have to do the legwork. This just makes sure we don't miss a deadline. Missing a deadline is either lost funds or more paperwork piled on.

174. This program is essential to our district and has allowed the ability to provide services that have enhanced student's education.

"This program is essential to our district and has allowed the ability to provide services that have enhanced student's education."

175. I used to apply every year, but the application process had become more convoluted and frustrating, it wasn't worth the discount that I was putting into the application
176. Very good job overall. I'm not sure how I would change it for the better to be honest. You all have a tough job to administer this program and you do it well.
177. 1. We utilized Category 2 funding a couple years ago to upgrade Internet cabling and Wi-Fi equipment in our library. We won't need to do that again for awhile. The funding was critical to getting this project completed. 2. As for the USAC goal of maximizing the cost effectiveness for supported purchases. USAC is not achieving this goal. The bid process makes this process complicated. The bid process is already inherent in the process we use for selecting a vendor to provide services. We already select service providers who provide the least cost for the best product value. The bid process is a good idea, but we are already doing it. You make this process more complicated than it needs to be. 3. Final comment. The process has improved and become more user friendly. The online EPC system is a great tool and continues to add services that make this easier to access. I like the EPC system. Thank you.
178. Thank you for your support for our students, our staff, and their needs. Your efforts and successes are very much appreciated! As an

E-rate program administrator for 14 years our district has the following needs: funds that support equitable and comprehensive telecommunications services (phones rather than bus Wi-Fi, low cost professionally managed transport networks rather than managing our own WAN), build EPC as a workflow solution complete with timelines, notifications, progress indicators, etc rather than a flat database of tools, and add the ability to complete BEAR and SPI work inside of the system. Finally, add the ability to add all of the information that PIA reviewers need to the system as we go through our process (procurement announcements, bid tabulations, quotes, etc.) and have the system approve or disapprove of equipment/services before the procurement process (like a preapproved list from each company) - this would lower the administrative burden on the PIA reviewer. Related ideas for workflow before the fact rather than after would help us work more effectively and prevent fraud as well. Again, thanks for all you do!

179. We really depend on the help we get from E-rate. We appreciate the services we are able to provide for our patrons here at the library.
180. Get rid of the, if the wan is down the lan must be up rule. Too much is now on the Internet and such thinking is obsolete.
181. We do not have an IT person at our school, so many of the questions asked in the survey, I do not know.
182. The program has evolved well over the past 15 years.
183. Enhanced Security including advanced firewall, DOS protection, and other security tools should be eligible under the E-rate program.
184. Content filtering
185. As a first time user, it was difficult for me to believe that a federal program this large would be so entirely un-user friendly. But then again, I do pay my taxes and I would say, the level of knowledge needed to apply for E-rate funding is pretty equivalent to the knowledge needed to file your own taxes. I don't believe that it should be this way but it definitely

is! I mean, there are people, many people, who make a living by filling out and following through on all aspects of the USAC and E-rate programs for the schools because the complexity makes it so you have to hire a third party to get it done correctly. Like H & R block for taxes. Doesn't that seem a little strange? Schools paying 5-25k a year to have someone else fill out their E-rate applications? Really wish someone could think this through and make some needed changes.

186. We only have one service provider in our area....so we can't guarantee that we are getting the best price!
187. Need to continue expanding services and equipment covered by Erate.
188. Without E-rate our district would not be able to provide the infrastructure we currently have to support student Internet connectivity. Student education has become dependent on Internet access. Thank you USAC
189. Funding for Network Security enhancements.
190. EPC is the bane of my E-rate experience. There is nothing intuitive nor efficient about the interface. I spend more time hunting for the place to start a form and then navigating the interview process of the form than I do on most of the other aspects of the program. It's sad to admit, the paper forms were more efficient.
191. My experience with USAC and E-rate has been quite mixed. Your representatives don't seem to have any desire to actually help. I work for a small school district & do E-rate applications once per year. Our last upgrade was downsized from \$88,000 to approximately \$12,000 because I could not make the E-rate rep understand that not every piece of equipment was for backup. I tried to explain & everything was denied. Not once did I feel anything was explained other than being accused of trying to get money for backup. I realize that I am not a tech person, but even I could look at that proposal and not see everything as ineligible. I just today finished answering questions regarding our managed IT contract that starts in

July. I have no confidence that I will see much money at all. As always, I will be left feeling frustrated and as if I've been called a liar. Then I will take a webinar only to hear about all the money that everyone leaves on the table. Truly, if I am an example, the reason could be that your representatives take back what is given. Having said that please note that I fully understand the need to adequately measure and track how federal dollars are spent. However, not every person doing it once per year is trying to "steal" from the system, and not every small school or library can afford to hire professionals to get this paperwork filed for them. The system is complicated & I believe, in part, made to be complicated to keep money from the smaller entities, such as mine. I'm certain it is of great help for people who can actually get the money.

192. Many rural libraries have no IT person and networking is above the skill levels of the director. We shouldn't be expected to know everything we need. It is like speaking a foreign language to me. VoIP needs to be funded. EPC is hard to use because it is complicated and I only use it once a year. If it weren't for the state library's help, I couldn't do it.
193. The Federal Law requires content filtering but the E-rate does not allow for the cost of the filter or filtering service. This is wrong.
194. EPC is very hard to work with. Complicated and repetitive. Not user friendly. Wi-Fi though important doesn't help programs that already have Wi-Fi connectivity and encourages very expensive management options which deplete E-rate funds. Return to phones (which is what pays for E-rate) is recommended. VoIP might work but not the same as land for rural/remote districts
195. Please do not put the burden of providing Internet to families on schools. K12 IT staff already have a lot on their plate and don't need the additional responsibility of having to maintain and troubleshoot home Internet as well. Moreover, this stop-gap is only useful for when families have school aged children at home. Students that go to a 2-year tech school or are trying to earn a 4-year



degree need Internet as well. Not to mention the parents of those students need Internet at home to make better informed decisions. The money that would be dumped into schools for hotspots and other substandard wireless systems for Internet would be wasted. These dollars would be better suited to encourage ISP's to install wired Internet in areas that do not have them at this time, (or only have a limited number of options to create competition). Additional dollars could be used to reduce the cost of Internet for families, like E-rate, using the NSLP eligibility. Wired Internet is more reliable than wireless Internet and it would permanently give an option for families to maintain Internet connections over time. Internet should be a utility. It should be wired to every household in the nation, available to many of the major ISP's for service

and the program should not be managed/maintained through the schools and libraries. EPC is still complicated. Look to reduce its complexity and wording. Please also consider changing rules so school districts should be able to pre-order using SPI. The BEAR process is restrictive for some districts to find funding initially with a pay back later on, and isn't really needed as an option. If every district got the discount upfront, they would be happy.

196. You're doing a great job! Keep up the good work!
197. The process is so difficult...that we need to hire a consultant. The process is so difficult, that the consultant sometimes gets it wrong. The process is so difficult, that the representative at USAC that our consultant works with gets it wrong. The process needs to

be able to be done by the school district. Why should we use tax dollars to pay a consultant to get more tax dollars? We keep using the consultant out of fear of the USAC auditing process. I hear this over and over from other districts - "don't do it yourself - you might get audited".

198. My biggest complaint about the E-rate program is that we are treated like we are trying to scam the system/program. We are a school district, administration and professionals that work with the E-rate program. We aren't trying to get additional funding that isn't necessary. But we are treated like we are trying to embezzle money or get away with something. The application and review process should not be nearly as cumbersome as it is. E-rate is a fantastic program for our schools but in all reality Internet

and technology is a necessity for our schools not a luxury like it was when in the past.

199. Too many forms to submit and too much delay between steps when filing. Why is BEAR still a separate site from everything else? We do GREATLY appreciate the new Category 2 budget changes including the district-wide budget rather than per school budget.
200. We need grants to be able to lay fiber to rural student homes. Satellite is not a viable option. We have a number of students who cannot work from home because they don't have Internet access and local ISPs won't provide service due to the cost of connecting them. If we truly want equity in access of education, please bridge the rural education gap.
201. We have for decades relied on the E-rate program. I don't know how we would function with out it as a public school system.
202. We have saved a lot of money by filing through E-rate
203. It would be much more practical to allocate funding based on a simple formula including poverty, membership, and attendance.
204. The biggest issue I see after 18 years working with E-rate funding is the inconsistency in the PIA process. Apparently contractors are used and they know little of the technology or education. They seemingly have a list of check boxes that must be checked... seems to be very little thought - just check the box. Could be wrong but it seems this way.
205. Simplify E-rate add firewall security and content filtering

“Simplify E-rate and add firewall security and content filtering.”

206. Network security is vital to us, having E-rate available for security (firewall, content filtering, etc) make sense!
207. I have struggled at times to receive timely feedback and information on my customer service requests. I often get told things are “in-review” but nothing ever changes with the case or the issue to which

the case was created for. This is frustrating as it is hard to tell our School Board where we are at when I do not have any new information.

208. We really need help with funding cyber security costs such as training, annual assessments, MFA tokens/software, anti-virus/IDP, etc.
209. Just started working with E-rate. I would like to see more options for using the funds available.
210. The application is very difficult to navigate. The issue usually happens if you have information to update. A long amount of time goes by before you know if your responses to inquiries are accepted.
211. Schools who can afford more consultants and staff time come out much further ahead than small schools with only one staff or limited staff. I also see locations using products with convenient features however some are very expensive and unnecessary to do what needed and get the job done. Some locations also seem to have a very short life cycle and replacing equipment very quickly. Too many forms, dates to complete and long timelines make it difficult to plan along with not knowing if we will have approval make it too late for summer projects. Consortium pricing would be a greater benefit as only large schools are getting better discounts on products already.
212. Thanks for the work and the support you give to schools!!!
213. Filing for E-rate is not easy. We hire a consultant to navigate and apply on our behalf.
214. E-rate application is absolutely horrible. We did the same process as previous year and was turned down with no explanation as to why. This will cost out small, private school an extra \$3K a year. We only depend on parent tuition in a medium-income community.
215. Thank you E-rate!
216. Security is a major concern. We are putting school and student data at risk when we are giving them the ability to purchase Internet access at a discount and then not giving them the ability to secure that connection at a discount. Security should be a requirement

for Internet and Wi-Fi and should be eligible for a discount.

217. Cumbersome, ignorantly restrictive and wasteful. Government should stay out of predicting needs and throwing money at things. There is no one size fits all and no amount of planning and rule making can make it fit.
218. VoIP services/equipment is very important!
219. We are grateful for this program, as it provides Internet to our 100% free breakfast/lunch program at our school. It supports our educational needs!
220. Students are in great need of having Internet access at home. Over 50% of our school districts residents have poor to no Internet connect at home. We need connectivity within our students homes.
221. The application process works well in some parts of it but in others it's very clumsy, inflexible, and counter-intuitive.
222. Auto fill in EPC is a great efficiency enhancement on forms. My only frustrations with EPC are: 1. finding the starting point for what I need to do—navigation on tipping right? Bottom of landing page? 2. Lack of link to main portal page from anywhere in EPC (specifically when finish a form) Eligible services list—I miss the golden age when we could fund servers and phones. I understand that it was politically expedient to open Category 1 to all schools, but the change has made it harder to complete equipment upgrades for an urban school with high free/ reduced student numbers.
223. The option of paying for Wi-Fi off-campus for devices and services such as hot spots would increase Internet availability in our community and be very much appreciated.
224. Good job on the portal. Having done this for over a decade the last few years have been so much smoother. Have also noticed a quicker turnaround too and that is appreciated.
225. The Category 2 equipment list is unclear on the forms. The equipment doesn't always neatly fit

into the equipment categories. For example, patch panels and power supplies.

226. The day to day operations of USAC are strong. The audit process by the contracted organization is arbitrary and time consuming when the audit agency is just filling a quota. If there are concerns, the audit should address those concerns and be focused.
227. The program is vital to us and our patrons. Content filtering and security services need to be eligible for E-rate funding! There should be an allotment of bandwidth that can be used for voice without penalty. The portal should ask for and assist with document retention and all phases of the process. Attempt to remove the fear from the system.
228. I really wish PIA reviewers could speak good English to allow them to explain questions. MOST IMPORTANT: introduce yourself when calling. With the number of SPAM calls I get, I don't respond well to: Is this "applicant name"?
229. Complicated and confusing
230. The website can sometimes be a bit confusing. I thank the our State Department of Education for giving step by step directions on how to fill out each Form. This was my first year doing this and I can honestly say that I had to take it very slow. There are so many layers to this and some of it was very confusing.
231. It's frustrating when you make a mistake on the Form 470 and you don't find out about the mistake until months later and you find out that your request for services will be denied. I understand there needs to be specific polies and rules set, but it's very frustrating that your RFP is good when requesting quotes and a simple mistake on the 470 gets you denied services.
232. Network security is a MAJOR concern given the ever-increasing attacks on school networks/ systems. We need to hire a network security professional, but we cannot afford it. It would be great if security services could be E-rated.
233. Category 2 funding is too low. We have to use our own funds to acquire our equipment. Category

2 budget is barely enough to buy yearly support on the equipment.

234. EPC application website is very clumsy and not user friendly
235. The online EPC portal is clunky and not intuitive. It needs an overhaul.
236. We stopped applying because of your necessary filtering rules. The board doesn't want to filter every computer in the library!!
237. There is not a lot of flexibility when there are possible clerical errors that occur during the application, approval, or reimbursement process. When a school can show they received multiple bids for projects and the items bid are for qualified services there should be flexibility so student learning and teaching are not negatively impacted. The most important thing is providing access. Schools should not have to hire a consultant to make sure every box is checked correctly. Hiring a consultant takes money away from a district while the goal of this program is to provide financial assistance. There is an appeal process, but sometimes flexibility and common sense should trump clerical issues during teh 470/471 process. Not every school district has people with technology degrees running tech or can afford to hire someone to complete forms for them accurately. You have to have a tech background to fully understand how to complete the forms. A suggestion would be the ability on a 470 to select what you want to purchase and then have the form auto-fill the appropriate category. Having people select the category themselves, bid, and then find out later it was not the correct category or code is playing got 'ya.
238. Remote connectivity like hotspots needs to be allowed, helping with VoIP/Phone costs would be of great help, and making the website easier to use is also important.
239. The EPC site could stand to be a little easier to maneuver. The eligibility services list needs to be expanded to provide cybersecurity funding and at-home Internet access for students.
240. Maybe have a personalized timeline (visual schematic) at sign in or on landing page to allow the user to see where they are in the

overall process of open funding years to give a better sense of upcoming deadlines or the next steps needed.

241. As a new user of E-rate, I would appreciate support from customer service. The first year I really received the run around and found it difficult to get answers. The turn around time for resolving issues was over 60 days in some incidents. This can be very frustrating.
242. Invaluable source of funds for schools and libraries. The learning curve for E-rate/USAC is fairly steep, but once that is negotiated it is a very friendly service.
243. Love the program Can not survive without it
244. It would help if the child entities were always alphabetized, not random.
245. We have 505 students and manage E-rate without a consultant. This year we completed the 470 and 471 just as we have in the past. And, just like last year, we wanted to purchase and install six access points. After our forms were submitted, some items appeared to be ineligible because our BMIC should have been input as IC. And then, almost 3 weeks later we got another email saying more items were ineligible in regards to the installation of BMIC. Not once was I able to talk to our Program Analyst on the phone (after many attempts and messages). I wish we could complete the forms ourselves but it has gotten so complicated and technical that even if you are only purchasing six access points, you need to contract out the work. I don't know what, if any, savings this would bring to our school after the consultant was paid. It is frustrating knowing the forms were completed exactly like the year before (which were 100% approved) but this year, on two separate occasions (on the same FRN) items were noted as ineligible. I did not understand if we should resubmit the form, apply for an appeal, etc and was never able to speak to the analyst. The reason for ineligibility was finally explained to me in an email after numerous voice messages. The email I received was friendly but did not explain how to fix the issues. The only reason it was considered ineligible was because

it was 'coded' incorrectly.....Not because what we purchased was ineligible. Out of frustration and lack of time, I responded by saying deduct whatever you want because we can't get help and don't know what to do next. It would be nice to have an E-rate EZ form for schools with minimal products and services. Up until this year, the help at USAC has been excellent in giving guidance, friendliness and providing education.

246. Please allow VoIP to be eligible.
247. I have been asking this for years, especially now that school security is at the fore-front. Every school must pay to have their Fire Alarm and Security (Burgular) alarm systems connected to either the Internet or a monitoring company. This connection has a cost. If we are covering cyber security (CIPA), E-rate should also be covering these costs too. Many smaller school districts will not empathize, but larger multi-building districts understand well these costs. Lastly, if we're strategizing security, camera systems are now invaluable to many districts. These costs are also burdensome.
248. The service is such a blessing. Thank you for all you do in helping connect our students to the Internet.
249. I really appreciate the financial assistance that E-rate provides for our school. I find the website and the application process very difficult to navigate. I always need help to apply.
250. It takes the PLA/Selective reviewers forever to get their job done. We were only funded for our dark fiber project in February only after I submitted a case each week. At that point we were already going out for bid again on the fiber.
251. Better communication on when forms are due would be helpful. Easier to use website would also be great.
252. Getting notifications of responses to inquires has been an issue. Often times a message is replied to and I have missed a deadline because I do not actively sit on the portal checking for responses. This has caused me to petition to reopen cases. I have also had issues with multiple people auditing

my account. It seems that one person was on it, and things were approved, only to have another reviewer not approve the same thing.

253. Phones are still critically important for schools to function safely and securely. Network security should also be an allowable cost.
254. Network filtering should be covered by E-rate.
255. I believe the application process has gaps and holes in it and is not intuitive. Applying for Category 1 or 2 features should be streamlined: quicker, easier, and user-friendly. Also, the user is not sure of what their next steps are which needs to be clarified. We suggest you create a pdf or job aid that outlines the steps, tells you where you are in the process, and states your next steps in the process will be. One should not have to be figure out, guess, or use customer support videos to accomplish the application. Finally, you need a quick glossary, the terms are clunky and atypical. We lost our window of opportunity because we couldn't figure out how to use the site and that is not equitable. Keep working to improve the site, please!!
256. As much as we need E-rate, I absolutely abhor the website and the hoops needed to go through for this funding. The website is very confusing and difficult to remember how to use when you are not using frequently.
257. Thank you.
258. Cyber security should be E-rate eligible.

"Cyber security should be E-rate eligible."

259. I truly believe that Lightspeed or Go Guardian, which offer security for our students should also be covered via E-rate. These programs filter over and above the local content filter. We are here to best serve and protect our students and this is another avenue these funds can help!
260. A wider range of technology and connectivity we could apply these funds for would be great. It really helps us to keep current in

our connectivity but the variety of demands on our technology infrastructure seems to constantly grow

261. The staff is very helpful in working through the process of applying. They are to be commended for their positive attitude and expertise.
262. It would be so much easier for charters to be able to put multiple charters on one login.
263. Although I sometimes find navigating the website challenging, USAC is great to work with - questions are easily submitted and quickly resolved through the website "ticket" system and by telephone.
264. Because of missed filings and opportunities in the past, we have engaged an outside vendor to keep us up to date and current. The amount of lift that it took to keep up on the changes to this process, it made sense to involve an outside professional. Wish the process was made more streamline and not so intimidating. There is so much information that is put out from USAC, that it is hard to filter what pertains to our situation.
265. We use an E-rate consultant to do our actual paperwork. It is some of the best money we spend, a small percentage of what we receive from E-rate funds.
266. Our E-rate Coordinator keeps us well-informed of all needed information.
267. Currently I think the E-rate process is still too complicated to complete without a consultant. I wish USAC would have clear outline and time periods when things are due. Also, more knowledge base and videos on how to fill out the forms.
268. It is very important that E-rate supports Network Security moving forward. Schools are being targeted everyday. Please allow this to be eligible.
269. The turn around time for questions and concerns for our State has been wonderful.
270. The goals of the program are critical and my interactions with staff have always been excellent. However, navigating the program is a huge headache. Some

information is in EPC, some in the BEAR reimbursement site, some is emailed, and some is postal mailed. For example, as far as I know, I can't go online and see a history of reimbursements paid; I have to piece that together via many pieces of mailed paperwork. The acronyms and form names are endlessly confusing and would benefit from simplified natural language. Instead of calling it form 472 or BEAR form, just call it a reimbursement form. The opaqueness and steep learning curve of the process causes errors and prevents organizations from fully participating. The fact that there is a whole consultant industry needed makes this clear.

271. During FY2021 process, I contacted the USAC/EPC help line. When asked if the operator would walk me through a particular task - I was told no, "that's what the consultants get paid for." When I indicated that we are a small division without a consultant - I was told, "If I tell you how to do [the task], you'll never hire a consultant."
272. The portal is exceptionally difficult to navigate and the human resources respond in a non-personable, robotic manner to which it is no different than the difficult to follow forms and processes. It takes weeks for a response and the response it just a repeat of the form which is what the question was about. This happens every year and the training is only good for people that do E-rate all year long. As a school admin that also is the only person to do the E-rate filing, it is overwhelming and unsupportive resulting in less connection for our students.
273. I think the application process is slow and cumbersome. Our coordinator is a terrific resource, and he makes this lengthy and frustrating application process bearable.
274. I am new to E-rate this year and I find the interface of the portal very hard to navigate. It is hard to find information easily. Also the feedback from USAC is slow from my experience. As a user I feel in the dark as it can take several weeks before any decision is made and it normally does not come to you, but you need to pursue it. I

feel firewall services should be a Category 1 funded service. I also believe cell phones should be eligible for reimbursements.

275. We appreciate everything we are getting and could not have it if we did not receive E-rate
276. I find the portal to be a nightmare. Things are not organized well and it is unclear sometimes where to click. Due dates are also not obvious. Why wouldn't these be posted all over the portal???? You only get a message AFTER the due date has passed NOT leading up to or even the day before!
277. Content filtering and network security is paramount to successfully providing Internet access to students and patrons.
278. I am unable to apply without the help of a consultant. I'd like to feel like I could do this on my own
279. We submitted a BEAR in Aug 2020. Still waiting for reimbursement. I called USAC several times, but receive no update other than "It's still being processed." I opened a Customer Service case in the portal Still awaiting an update.
280. The 2 factor authentication for EPC is absurd, hard to get help, forms can be confusing, many vendors increased cost when quoting for E-rate
281. The EPC is unwieldy and difficult to use.
282. Changing password every 2 months and the double verification is a nightmare. Takes too much valuable time to log in.
283. We use an E-rate agent to file all of our paperwork, consequently I may have answered some questions poorly
284. Great for our patrons. As most of them do not have Internet service at home. It is very much appreciated.
285. There needs to be some avenue for school districts that get harassed by vendor who did not win a bid when all rules were followed. Vendors should not be allowed to harass and threaten school districts or pressure them to change their decision. They should not be allowed to threaten that they will be turned into USAC if they

did not win the bid. There is one company in our area that does this to everyone! It makes the E-rate process almost unbearable.

286. Please consider funding Broadband connection from home as an extension for school use outside school hours. Many students are now expected to research and connect to Internet applications to expand on daily instructions. Federals fund assisted with a 1-to-1 devices in VA. I know if Internet for home-use is accepted through E-rate funding having broadband for all will become a reality in VA much sooner than later. I ask again to please consider. "Together We Shine Brighter!"
287. The program is great. We are fortunate to have programs like this for schools.
288. The entire back and forth process for the E-rate PIA is ridiculous. It takes entirely too long and there is no consistency between reviewers. I would rather submit everything at the time of the 471. Also when a PIA is sent and clarification is needed, sending the exact same PIA again is not helpful, need more information. The system USAC system is archaic and not user friendly, someone should engage a user experience team to get feedback on the process, you have to click way to many times and it is repetitive. This is not a simple system and the process is not well documented.
289. E-rate has been very valuable for our school district. We appreciate services that are provided.
290. It would really be great to have VoIP equipment and Network security software/equipment eligible for E-rate.
291. E-rate is a very good program. It would be good to provide hardwares such as servers, VoIP connectivity and to lower the copayment schools has to pay. Although the students did not come to school. Internet connectivity saved this year school program. I think there should be more coverage and services in order to fulfill every child needs. Thanks a lot.
292. I would like to recommend that we work with our local fiber providers to supply cost efficient fiber

connections to the homes. Schools could partner with providers that are working to expand fiber networks out to the rural areas to help offset cost for the company and establish quality fiber connectivity to rural homes and businesses.

293. My only major concern is PIA reviews. I get a notification and I am asked to submit documentation. I do and then it is weeks if not months that I hear nothing. One current case started last September and I have inquired multiple times and I still have not gotten my reimbursement or an additional communications.
294. In general we're very happy with the E-rate service, we're a low income area but we're able to provide robust high speed Internet and Wi-Fi at a manageable cost. I do find the USAC portal to be frustrating at times. I also think some of the PIA inquiries we get are redundant and/or overly pendantic, or unnecessary as the answers are all in the documentation already submitted. And while I appreciate the need for PIA reviews and agree that the program needs to be protected against misuse - such reviews do slow down the approval process and can set a project back for months, often for a very minor inquiry. We've also had things approved in PIA and recived an FCDL, only to have the same questions be raised during reimbursement. I think funding should be per district, rather than per school, with some oversight, but more flexibility on cost sharing than in the past... seems to be moving that way which is good. A redundant connection would be good. Community Wi-Fi provisions would be great. I'd also like to be able to use E-rate for VoIP equipment because we could put phone stuff on the same switches as our network. I'd also like to be able to use Category 2 E-rate for our Central Office and bus garage, and maybe even at our ball fields. Some of this may be possible now, but all of those school properties are used in support of students and educational goals.
295. The application process is confusing and laborious. The dashboard/activity board is hard

to navigate and find what you're looking for. It's tough trying to edit items already upload and completed.

296. Thank you for the E-rate Program and for the opportunity to provide input through this survey.
297. Reviewers know little to nothing about the network equipment and question basic equipment. They should be knowledgeable of technology requests in order to be a reviewer.
298. Since it is required for schools and libraries to comply with CIPA guidelines, funds for filtering should be an option.
299. USAC was very flexible during the pandemic months. And, it was much appreciated for distance learners.
300. Data devices (ie hotspots) that are used for school/students. Devices must be CIPA compliant.
301. I used the how to videos on EPC extensively this year. They are short and easy to follow. As a first time filer, I relied on them to get my work done. Thank you for posting those!
302. USAC Demand Payment Letters are inconsistent and often when schools receive their first notification, it's actually the second DPL and the deadline to appeal has already passed. It's tragic, unprofessional, and has caused undue financial ramifications for our institutions.
303. I believe E-rate is unnecessarily complicated and would be an overwhelming administrative nightmare if we didn't use a consultant whose full time specialty is E-rate consulting.
304. I have been working with E-rate for 15 years. It has evolved a lot and is working very well for us.
305. Although I answered no concerning Telephone and VoIP options, I would be in favor of a reduced % coverage of these services. For example a 90% district receiving 40% coverage. These services are not necessarily a necessity, HOWEVER, they are becoming more and more a safety necessity.
306. EPC makes the application processes much easier. We

appreciate the benefits of the E-rate program for our public library patrons' use of the Internet.

307. It is a wonderful program Thanks
308. We really need the ability to fund more backup connections (within reason) and telephone service again. Not all divisions are the same. Large divisions tend to manage with funding because of their tax base. Small school systems are getting crushed because the tax base is smaller and smaller changes have huge effects on our budgets. It really cannot be the schools job to provide Internet access to the county. WE ARE NOT AN ISP FOR THE PUBLIC. Instead we should be focused on what our mission goal is, to educate children. I find that I spend about 40% of my time dealing with Internet access issues because we now provide Internet service to all students for COVID access. Yet we have no more personnel because E-rate funds and others never cover these costs. One time COVID funds are never used for salaries because that money disappears, Superintendents and Boards won't approve use for that. This once again goes back to schools being forced into the situation to provide Internet for residents in the county (50% of students have no Internet here or availability). The FCC has been failing at its job, Internet should be a basic utility that is available for all people. You don't build a house and get told you can't have electricity. How in 2021 is Internet not a basic fundamental utility service? Sure you don't have to provide 10 Gigabit connections to all, but there should be a basic standard of service available to everyone. Instead for profit businesses continue to cherry pick areas of residential housing leaving millions of Americans without any Internet option.
309. Please make hotspots and other remote Internet service providers E-rate eligible! This would make such a difference to our low-income residents!
310. I wish you still covered Cell Phone usage. It is a way in which our organization saves on landline cost which in rural areas such as Vermont should be part of E-rate again.

311. We also need to have filtering services included as an eligible service.	Teleconnect will not support phone bill discounts any more.	have a filter measure that hinders the free flow of information to students and the public.
312. We agree that resilient Internet connections SHOULD be eligible... meaning single Internet connections provided by a single provider that arrive via more than one path but for which the entire capacity is needed and utilized, or two connections from two providers for which the entire combined capacity is needed and utilized, so long as they are competitively bid and cost effective. As USAC does, we disagree with the notion of "failover" or "spare" Internet connections in which the entire capacity is not needed or utilized except for in the case of failure of the primary connection. We STRONGLY disagree with the notion that USAC should get in the way of an applicant who arranges a resilient (or spare, or failover) Internet connection when that connection is not funded by USAC in any way. USAC's mandate does not include preventing technology solutions with which they don't agree in situations where they aren't being asked to pay for it.	317. EPC responses to questions/ concerns/issues could be quicker.	329. The response time by USAC when emailed is extremely slow and the communication is lacking (if you even hear back).
	318. Thank You for all you do.	
	319. Truly appreciate all the support!	
	320. The reimbursement per line of the original request complicated the way we control reimbursements	330. We definitely benefit from being a part of the our state E-rate consortium. We haven't used E-rate much previously for our Category 2 purchases because we have a low Free/Reduced Lunch percentage.
	321. Our E-rate staff are amazing and we could not function as an organization without them.	
	322. While cellular and landline telephone funding does not need to return, funding for VOIP would be beneficial.	331. The program is a significant benefit to our district as it allows us to refresh our network equipment at a highly discounted cost to the district. Would love to see if expand to cover more items that school districts need to secure the networks/devices and expand off campus accessibility.
	323. We appreciate the USAC / E-rate program for being able to connect our rural county facilities, because we have multiple LECs in the county and that helps simplify the process of consolidating connectivity.	
	324. I don't actually understand all the questions, but I did my best guess.	332. I currently don't find E-rate to be all that cost-effective as I am still investing my time in appealing a decision made by USAC to not remit committed funds to the contracted vendor after we had already been notified that funds had been committed. Upon receipt of the positive commitment letter, we proceeded with the project only to have the USAC back out of their end of the bargain. Unacceptable if you ask me. Funding decision letters should not be issued unless USAC fully intends to pay the amount committed in the letter. Once the letter is issued USAC should be legally obligated to release the funds committed.
313. The review process seems to look for reasons to deny instead of helping schools. It is important to weed out misuse but to openly trying to deny is not the mission of USAC. Needs to really be looked into. There is no accountability for the review group and it is really ruining it for schools	325. USAC has not paid for any of the equipment/labor they approved in 2019 toward upgrading our network. Our vendor - the only provider agreeing to provide critical IT services - has not been paid, and as a result, we are in danger of losing his services. The work done and the equipment purchased is EXACTLY as requested in our E-rate Category 2 request in 2019. We know our IT services provider will never trust USAC again - and their failure to meet its obligation might cost us our only access to IT services.	
314. I think content filtering should qualify for funding		333. The new vendor that you are using for the application review was a very poor experience. They lacked expertise and failed in providing timely service. Please return to the prior vendor relationship.
315. Due to the ongoing pandemic we are in great need of more student and teacher technology to better serve our students during distance learning.	326. The forms are still lengthy and confusing. A consultant is needed to navigate them.	
316. E-rate program vital to our small, rural school. However, the rural location does not have sustainable bandwidth to provide 1 Mbps for each student in the District and there are limited service providers that can offer Internet in our area. Telephone service should be added back to E-rate program especially when schools are closed and many phone calls are made to students each day, which tripled our monthly telephone bill and I have been told that CA	327. The E-rate program and USAC portal remain frustratingly difficult for non-specialists to use and understand.	334. Thank you for all the support you have provided. We look forward to what the future brings via E-rate. It is a God send!!!!
	328. Libraries are hurt greatly by the requirement to put a filter in place... unlike public schools libraries are not granted in loco parentis of children and should not be required to be... libraries should only be asked to have an Internet use policy in place for the library and that should be sufficient to comply with law without having to	335. Kudos to our E-rate Coordinator and Consultant - they do amazing work to support us!
		336. I appreciate the recognition of all network services being included for consideration, including phone/ VoIP services.
		337. Interacting within EPC during a PIA review can be very



frustrating. Without the support our Coordinator, EPC would be extremely hard to navigate.

- 338. E-rate funding is essential for public schools success. Without E-rate funding there would not be Internet access to multiple public schools within the United States.
- 339. Network monitoring and security really needs to be eligible, especially with so many devices going home and then reconnecting to the network. The possibility of phishing and ransomware has increased 200% and small schools do not have the staff to deal with all the monitoring that is now required to keep networks safe.
- 340. Please make content filtering E-rate eligible.
- 341. Redundancy Internet would be a huge benefit, as well as internal phone network funding (VoIP), and the ability to use E-rate funding to provide hotspots etc. to families.
- 342. Great program. We have used E-rate the last few years now our network is great! It would be nice if E-rate could be used to secure and manage the network, this would include firewalls/UTMs, security audits, network monitors, and authentication/network access control devices.
- 343. Our broadband is VERY low or nonexistent. What we do have is very expensive. We are a very rural small low income community. We need help getting better service, servers. Some of our students don't take computers home due to poor or no Internet service.
- 344. To many PIA Reviews and Questions every year for the same services.
- 345. USAC is terrible. Let us decision makers decide on how and what to spend the funding on. Your rules are ridiculous and they do a terrible job monitoring it.
- 346. High Poverty Districts do need E-rate funding and we are very grateful for having it.
- 347. My biggest complaint is that the application processes and the EPC portal continue to be very confusing. We hire a consultant to help with this process to ensure we do not lose funding if we submit or apply for something incorrectly.

It's not a user friendly discount program and it's not a user friendly portal/online process.

- 348. I think the 471 process is overly burdensome. I end up duplicating a lot of information on the 471 itself that is already laid out on the winning bid. For instance, on my latest switch upgrade bid, on the 471, I had to break out components such as transceivers, modules, switches, etc when this was already broken out on the bid. It is time consuming and unnecessary.
- 349. If 2020 has shown us anything, it would be that education and learning is an action, not a place. We need to be able to leverage E-rate funds to offer services off premise. Our district has a significant amount of families do not have reliable cell coverage or cable/fiber in the area. We are in a position to offer Internet service via private wireless and LTE but would like to be able to leverage E-rate funds for things such as tower construction and lease. We should also be able to use our E-rate funded transport for these services. We are currently building out parallel backhaul out of pocket so that we don't use E-rate funded transport. This especially applies to private fiber. If we exceed 10gbps on a pair of fiber that is E-rated we simply put 40gbps or 100gbps optics on each end to increase capacity. Putting extra traffic on these private fiber strands would in no way require a district to purchase more fiber. We are simply not using for off premise connectivity because the rules say that we can't not because it would have a negative impact on building connectivity. Internet is essential to the education process. Dual Internet services should be eligible for reimbursement. We are currently paying out of pocket for a second service. Cyber security is a huge issue. Firewall security services, NACs, EDR, MFA and cloud backup service should all be eligible services
- 350. All items (hardware and software and ongoing subscriptions) for Internet access, firewalls and filtering, and security should be eligible. Having the hardware is irrelevant without the software and subscriptions. Since the items above are pretty much critical for

all schools, they should be covered. Also, why is the E-rate program a once a year program? It seems that it should be ongoing at any time, especially since everything is handled digitally. It is hard to predict our needs at a single point in time of the year. Case in point: how many districts had to add hotspots and services to their inventory in April, 2019? No one predicted that and we were stuck with those costs.

- 351. The USAC customer service representatives are always kind and very helpful when I call. We appreciate the support!
- 352. We are a very economically challenged and rural community with many technologically underserved individuals. The E-rate program is paramount in our mission to serve those populations
- 353. Our district would be in trouble if we did not have the E-rate program to provide our Internet service and Category 2 networking equipment. We hope that this service will continue and add other services. Thank you for having this program available for low funded districts.
- 354. Easier and more intuitive navigation moving about the EPC portal and between documents.
- 355. To the FCC I would ask why Internet is not yet classified as a utility and available to all Americans. It is absurd that we should have anyone without affordable, high-speed access. Legacy phone systems are gone and have been replaced by the Internet. Time to grow up as an agency of the US.gov.
- 356. I find it difficult. Too many stages and steps. No chance to change if entered something incorrectly. Very hard to get a hold of people.
- 357. E-rate process and the Web portal are not intuitive and clunky
- 358. The ability to use E-rate funds to have home Internet installed for students show can not afford would be huge. We have used federal stimulus money to support hotspots but when there are multiple students online and/or depending upon location cellular coverage does not provide the needed connection to actively engage in learning.

359. USAC staff have been terrific to work with. Also, current firewall eligibility rules are archaic and need be revised.
360. I would love to see servers including domain controllers included as well.
361. This program is definitely necessary for schools. Failover Internet service is also necessary and we could get a better failover service if it were allowed on E-rate. Things are a lot faster with the EPC portal.
362. COVID has made the issue of home Internet a huge concern for us. If E-rate could assist with this it would be very helpful.
363. Hello, with cybersecurity being a major topic and most schools are visibly not prepared, adding security-related options to E-rate would be a way to better secure the nation. Ransomware is specifically targeting schools with far too high rates of success. I do not agree with bringing VoIP back into E-rate but would immediately leverage support for Dual (or more) ISP connections and enhanced security products.
364. I think the E-rate program should consider the security of the network just as important as getting more speed within the network, so any cybersecurity initiative would be greatly appreciated as well.
365. I genuinely appreciate how user-friendly the entire program is. From working with our representative, USAC, and FCC. Client services are always helpful and kind. The portal are easy to work through, and the process of the application, notice, and reimbursement is very simple. This past year, it was much easier for me to understand the process and work through it. I don't have any other comments or suggestions at this time for additional services.
366. The language of options you choose from drop-downs is confusing which sometimes causes clerical errors.
367. Categorization of eligible components can be a struggle with PIA. They are fixated on determining WAP brackets for installation are actually "racks and cabinets" in their minds (or what manufacturers have suggested to them).
368. I strongly support allowing districts to use E-rate funded equipment and service to provide Internet access to off-campus entities in our community. I also support utilizing E-rate funds for security systems. Another thought I will share is that collaborative efforts between districts and the local municipality should be encouraged and allowed. Our local municipality is willing to allow us to use their primary Internet connection as our backup (on their dime), however, in order for the district to allow the city to use the district's Internet as their backup would require time-consuming tracking of bandwidth as a percentage of city-used vs district-used in order to maintain compliance with USAC. Let our communities work together and share resources, it will be cost-effective in the long run.
369. Although some changes have been made to make the system easier to use, it's still difficult, and unintentional errors can be made easily.
370. The process to apply for E-rate is lengthy, confusing and ever changing. We have to hire a consultant to help us each year with the process. That is tax dollars going elsewhere, instead of being used to educate students.
371. Our E-rate advisor for our state is AMAZING! We couldn't complete this process without her!
372. 1. We have given families 160 hot spots because of the Pandemic. I would like to be able to receive discounts for those hot spots and/or for low income families to be able to receive discounts on Internet access. 2. I prefer that the school district is not responsible to "build-out" Internet access into the community. I think that providers should be responsible to do this and there should be incentives for them to do that. We do not have staffing to do this.
373. Would be nice if surveillance cameras and associated servers were funded.
374. Cybersecurity is a growing risk to the security of the nation. The FCC really needs to consider expansion of its rules to allow for greater application of E-rate funds by the schools who are eligible to receive such funds.
375. EPIC has gotten better over the years, but it's still confusing when you only do some of these things once every couple of years. We have a great E-rate person to help us out in our state, but the site just seems like it's disorganized. Many times there are links that you click on and it doesn't get you to where you should be and getting back to the correct place may not be as easy as it should be. The way some things are categorized with in 470's is confusing too. I made a mistake on mine this year and i'm not sure we will be fully funded because of it. It's just frustrating that once things are closed and you don't find out about the mistake till months later and there is nothing that you can do about it.
376. I believe Internet to all schools in your district should qualify for E-rate. We have 4 buildings in our district but only get Internet E-rate funding for 1 of them.
377. Auditors need to respond to the questions asked by applicants and not with default answers or additional questions.
378. I was happy when USAC upgraded to the EPC portal, but I do find that it is not as user friendly as I would like.
379. The entire thing is very confusing. I came into my position in October and had to play "catch-up" with all the due dates, etc. Vocabulary is a joke - I have no idea what most of this stuff is asking (I'm not technical at all). My so-called provider couldn't provide me with any account information because my account information was in a security vault they couldn't access, and I have only one provided for the Internet in my area but was receiving bids from places I've never even heard of. I don't have time to research if they are viable, I don't have time to research the vernacular, and I was on the phone with COMCAST for hours trying to track down this business account information on our E-rate contract, talked to 10 different people and shuffled all over the place. Please, let us tell you what we need. YOU go to the providers in our geographical areas, ask them to provide for us and cut us out of the

process. It shouldn't have to involve so many deadlines and paperwork on our end for a so-called, "service."

380. I strongly support the model that allow families to apply and receive support for home Internet service based on economic need. I do not want this to run through the district. Network security is more critical and consumes a greater portion of a district budget than ever before. This should be one of the most important things to be funded by E-rate.
381. Thank you for funding this program.
382. Need to have an option for library consortium to file as the consortium. Right now we're a mix of library and library system.
383. E-rate rules require entities to have content filtering to qualify but does not allow for payment of these services through E-rate
384. We should have more selection over the vendors we choose that on just the lowest bid. We do not want inferior products.

"We should have more selection over the vendors we choose..."

385. Allowing existing E-rate eligible circuits (Internet and transport) to be used to provide services off-campus is an absolute must for meeting the needs of students and families in the future. We have a number of ways to meet student needs in our community (Wi-Fi, cbrs, etc) but E-rate doesn't let us use the infrastructure we already have to make it work. LEARNING THROUGH TECHNOLOGY IS NO LONGER CONFINED TO THE SCHOOL GROUNDS. Expanding the rules to let us use the circuits we already have to help with these projects would cost USAC nothing and greatly expand our options to help students and families.
386. I know it has gotten better, but it's still pretty cumbersome and can be very confusing at times... especially with Category 2 rules and filings. We aren't experts in everything and it would be nice if there was some flexibility for reimbursement on category 2 items that weren't included in an original

470 filing because we didn't realize we needed those items until we received proposals from vendors. There are lots of components involved with building networks and it's hard to know exactly what you'll need unless you spend even more money and hire someone to assist with the development of an RFP. That's just not possible for small, rural districts. That's just one example of the need for some level of flexibility.

387. The 471 forms are still a little confusing. Also, the system to file can be confusing.
388. We have applied for E-rate funding in the past but found
389. Cameras should be considered especially if they help for statistical purposes.
390. We are thankful for the E-rate program to help fund our broadband Internet service and managed services. Our school district needs additional funding to help our families in rural areas get connected to the Internet for remote learning. We have had to purchase numerous hotspots. The government needs to figure out how to provide Wi-Fi just like it did when homes were connected to electricity. USAC needs to simplify the filing process even more than it has. It has been easier to file the forms. The PIA review is challenging depending on the reviewer - some are helpful and others are difficult to even contact. I had to open a case in order to have one reviewer respond to my questions. Districts need help with security and filtering. It would be helpful if the E-rate program could fund some of these initiatives. Overall, we are very thankful to the FCC for funding the E-rate program.
391. I wish student and staff devices could be purchased with E-rate funds.
392. It would be really nice if Pier Review would look at all of their documentation before asking for more, especially for Internet Access that has been applied for and approved for the last 19 years. We still have not received our payment for Internet Service for 2019
393. The process over all needs to be streamlined vs Category 1,

Category 2, etc -- It's extremely hard to describe funding to district admins and the like when they are seeing the budgeting/spending process as an overall cost/expense rather than cost benefit model. The SPI model should be the norm. Vendors will adjust. That would reduce the spend, claim, pay vendor cycle that provide the perception of an inflated expenses due to the claim structure of the program.

394. My only complaint regarding the E-rate program is the amount of time it takes to resolve appeals related to funding denials. I had an incident that took almost 3 years to resolve.
395. We live up in the mountains. The only accessed to the "world" via Internet have been with you. Thank for your service. Also my service provider is very committed to give us excellence service when we need it most. Thank you.
396. It would help if the bureaucracy was reduced and it was easier for schools to get funding similar to federal title programs
397. If servers could be eligible, that would be of great assistance. As an example our server overhaul (done every 4 years) costs around \$50,000 for the district and it prevents us from completing other projects without significant grant funding when each overhaul is done.
398. Internet filter should be eligible for security reasons and to comply with CIPA.
399. EPC and the BEAR process are still cumbersome to traverse. Please consider taking the time to ask users how they can make things simpler. Where is the question about content filtering being added to E-rate? Its a REQUIREMENT for E-rate yet the services and hardware are not eligible. That doesn't make sense. The government should be working with Internet services providers to increase the connectivity to rural areas. They should NOT be doing this through the schools. Schools already have enough to do and don't need another thing thrown on them because the financial piece is sorted out already through E-rate. Get the ISPs to develop their networks further out to new

subdivisions, to country roads, and new areas so we can connect the entire nation. Hotspots from Schools are not the solution. Homes need Internet connectivity capability first and foremost (make it a utility!), then subsidize the cost for those that are on the NSLP free/reduced lunch program so they can still get Internet at home. Please consider this.

400. We purchased a new network firewall 3 years ago with the help of Category 2 E-rate funding. Now, 3 years later, we need to renew the security and maintenance licensing on the firewall and E-rate doesn't support that purchase. USAC needs to allow hardware licensing as one of the ways Category 2 funding can be used.
401. Our library is able to provide quality Internet access to our community only because of the E-rate program. In the future, we would like to see E-rate cover library-owned mobile hotspots. That would be extremely beneficial for my rural community.
402. Very thankful for the program, it would be Great if it could expand to connectivity for students at home.
403. Off campus Internet connectivity is necessary to maintain and increase student achievement. It needs to be made eligible
404. It takes the reviewers a crazy long time to review the data and make a decision. In some cases if awarded late, it causes other issues in the project.
405. Although the website has improved it is still extremely hard to use. For example - I know there is a way to see how much I have received in payments - however I can't find it, unless I ask the people who provide support. Our State Library pays for this assistance. Without their help I would be totally stuck trying to figure out what needs done!
406. Network Security and off site Internet access is essential in a post COVID world.
407. Make competitive bidding requirements less stringent, because we will find the least expensive place to get our equipment.

408. Due to E-rate, our Wi-Fi in schools works really well. Our issue is that we do not have good Internet connections in our community. That is where I think we should be putting this money. Once you update your network, your limitations on what we can spend it on isn't productive to what we need.

409. I wish that E-rate would allocate the dollars we are eligible for and allow us to easily manipulate those dollars without jumping through all the hoops for the dollars. I feel the process is way to complicated and it should be far easier to apply over the 5 year period for the dollars. Once the 5 year amount is allocated and approved why do we need to reapply each year instead of having the dollars available to spend as we would request on our initial application.
410. Filtering would be an added benefit.
411. We have lost funding due to the complicated application and extremely unfriendly EPC program!
412. Couldn't navigate this complex system without our consultant.
413. I am very pleased with this program.
414. My school district is located in an extremely economically disadvantaged rural county and the funding via the E-rate program is the bridge that allows us to move towards equitable resources.
415. More Category 2 examples an explanation. Keep it simple. I'm not sure as to what qualifies. Maintenance? We need help with service calls.
416. VoIP and hotspots need to be eligible
417. The greatest need is to include ineligible items such as home Internet access for students, content filtering, and network managing and monitoring tools. Another frustrating area is the FCC appeal process beyond USAC's authority. There is no communication or status available for appeals. My district has been waiting for years with no communication (positively or negatively) on the status of an appeal. This is an unacceptable

practice in an already stressful process. Happy to hear of the positive step of school district budgets over individual school budgets. This will allow us to more fully utilize funds, have some flexibility to meet our greatest needs, and reduce some unneeded record keeping.

418. We need in home Internet and device support for our families. The majority of curriculum is serviced online and a great percentage of our families are economically disadvantaged so find it difficult to support their children. School District Technology departments are severely understaffed. Support for additional Technology Staff and managed support is very much needed to meet the needs of staff and students. School Districts find it extremely difficult to stay up with the trends and technology advancements.
419. Making failover E-rate eligible would greatly improve consistent connectivity for our students.
420. The implementation of our (2) 10Gbps circuits has been beneficial to the communities we serve. Thank you.
421. We would likely not be able to provide the Internet connectivity required for our programs and devices if it were not for the E-rate program.
422. Our reliance on Internet demands we have redundant connections. E-rate needs to allow this expense.

“Our reliance on Internet demands we have redundant connections.”

423. We appreciate E-rate
424. EPC needs to be made user friendly, especially when trying to find something that isn't one of the home screen menu choices, such as entity updates.
425. Thankful of E-rate in our Schools
426. The E-rate process is very difficult. I am a public librarian and filling out the E-rate forms is very difficult. The wording is not easy to understand. I think it would help if the designers would think about the most rural and remote librarians

as their clients. And then think about how we have little to no help with the forms or understanding the process of the forms. The videos on EPC are very helpful and I appreciate them. I feel strongly the entire process is more difficult than it needs to be. Thank you

427. Reviewers should have some knowledge of the equipment they are reviewing. The competitive bidding process should be looked at. Districts should be able to specify a standard model of equipment. Vendors can still competitively bid this equipment without having to put districts in a position where cheaper equipment that does not work as well wins the bid.
428. Extend the E-rate window and allow for previous purchased Category 2 purchases (i.e. to accommodate reimbursements for purchases before the window opened to facilitate remote and distance learning because of COVID-19)
429. I find your website extremely difficult to navigate. I am constantly in fear of missing a date or required report. Would be great if you directly emailed regarding next steps required.
430. I like the direction things seem to be headed in the future, but schools need help NOW.

“I like the direction things seem to be headed in the future, but schools need help NOW.”

431. The E-rate program is convoluted. It could be simplified as a shopping cart for goods needed, we live in the age of Amazon after all. Say I pick “Aruba 6100x switch or equivalent”, now every business that has opted in for a “switch sales group” within 200 miles of my location gets notified that my order exists. They can then silently bid against one another on the back end. Then I, the buyer, logs in and makes a final decision using a digital spreadsheet the EPC system has generated. I shouldn’t have to siphon through 80 different email strings to buy basic hardware. As a money-saving

project this is wasting my time, my employers time, the taxpayers time. Time is money. One of the online store has a very basic but poorly executed example of this, you can order goods and it lists different suppliers, so the end-user gets to choose the best “bid” for the item they are buying. More complicated install jobs can follow the current structure. More Tutorials should be made. Too much stuff in the EPC was scattered around willy nilly. It is a vast improvement from last year, but there is still work to be done. I remember wasting half a day just trying to find where to make contracts. There was no mention of them on the current tutorials, all of a sudden it just said, “now pick one of your contracts”. Please take a lump of taxpayer money and make this easy to do. There is no reason for paid consultants to exist in 2021 with how far technology has advanced. There should be free government supplied tech support.

432. Sufficient broadband is necessary for students at home.
433. The money allocated through E-rate did not originate with USAC. It’s taxpayers’ money and should be returned to local taxpayers. Each year you make it more difficult to do this. Our support is a little over \$500 each year. It’s a pathetic amount of reimbursement. The EPC has not made the E-rate program any easier to use.
434. The E-rate system needs to be simplified further. It is an impossible program to manage without hiring a consulting firm.
435. Please help us with Cyber Security!
436. If an entity files BEAR forms and there is a problem the entity should be contacted not a provider. We almost missed funding because an email was sent to a provider about questions about services instead of the school’s representatives.
437. The current limits put on 90% schools hurts the poorer districts. The program currently favors wealthier schools in urban areas and has forgotten about poor schools in rural areas. Rural schools can no longer gain access to advanced technology because the ability to purchase these items using our Category Two discounts has been taken away. Poor district

would utilize IP Telephony to create video and audio networks for instruction, intercom systems for safety, and a myriad of other things that USAC and the FCC have no idea were being used for education. The limits put in place in recent years have killed the ability rural schools had to think outside the box and have the money to pull off these amazing things. We were teaching Chinese between school districts in rural Mississippi, and now we don’t have the funds to replace the equipment. All of the money goes to city school districts that have a huge tax base and don’t need the money to purchase their own switches and wireless. They already had all of those things, and now the rural district can barely afford to replace their aging networks every 10-15 years. Give the true 90% free and reduced lunch schools in rural areas the ability to innovate again!

438. Contract network tech support for distance learning locations, specifically non school district owned locations that distant learners occupy.
439. The process is very difficult. We do not hire a consultant to complete it. I am a principal of a mid-sized, suburban Catholic school who works through the process each year, and the amount of time I devote to it isn’t necessarily worth completing it for the savings we receive. It is expected I do it as it is money out there for us to get, but it is very time-consuming and difficult for me to complete since I am not familiar with all the hardware language. I am certainly very appreciative of the money we receive, but I put far too much time into it.
440. Overall, I think the E-rate program is a success and it is the primary funding source we use for modernizing our network infrastructure. I look forward to more funding opportunities, including Internet/network redundancy, cybersecurity equipment/services, and off-site Internet access.
441. Annual process sometimes reduces opportunities to leverage other funds. Twice-annual process would help.
442. Thank goodness for it

443. The Internet is just one part of the solution/problems in school. Security is the other part of it that is part of the Internet. Unless you are a huge school district, you can't spend money on security to keep your Internet and in turn, your users (students/Staff) safe and school open and working. When a school gets hit with ransomware or something like that, schools close. With so much curriculum on the Internet to save on cost, when we lose the Internet and don't have a backup (dual lines), school is closed, period. No learning at all. Security is falling through the cracks on some school but others like mine, no money for it and no personnel to manage it. No wonder schools have seen a 30% increase in attacks in 20-21 school year.

444. I was just thinking the other day about how easy it is now. No more certified mail and copying everything. THANKS!

445. E-rate has been vital to our districts ability to provide an equitable education to our students. My main concern results from last year and the denied purchase of more than basic firewalls. Keeping

our network safe and if a district is explaining why they need better equipment it should be a conversation, not just funding basic firewalls that won't work in our configuration. We funded the firewalls we needed. We shouldn't be penalized for protecting our district at industry standard levels. Thanks! Other than that the program has met the needs.

446. The E-rate program has evolved and grown since its inception. In the beginning, creative school inclusion in our district to qualify for Priority 2 was a chore. However, as USAC phased out Voice making those funds available to every district at all discount levels, made the application process easier. And the experiment of entity based Category 2 budgets brought back further issues in filing forcing E-rate to bring back District Category 2 budgets. Ahhhh

447. Schools in library's should be required to have an E-rate program

448. Without E-rate, it is impossible to afford the Internet and hardware.

449. E-rate is an integral part of our

budgeting process each year. Our district relies heavily on E-rate to subsidize Internet access, switches and Access Points.

450. Bring back face to face training
Multi year funding for Category 1 with multi year contracts.

451. Please bring back E-rate support for telephony. Also, please allow aggregated/redundant Internet connections. One connection to the Internet isn't enough to ensure that learning can continue in the event that the connection goes down.

452. Overall, I believe that the E-rate program helps our organization achieve its goal of providing high speed, reliable broadband connectivity. I believe that the E-rate competitive bidding process has greatly increased the number of providers that are willing to bid on services in our region, driving down costs. However, I do believe that there is some room for improvement. First and foremost is adding network security to the eligible services list. DDoS threat mitigation service carries a significant expense, which must





- be paid out-of-pocket with no E-rate funding. Additionally, firewall services and subscriptions are much more costly than the firewall hardware that E-rate currently funds. I also believe that there should be some level of funding for redundant and failover Internet services. Due to the increased competition, there are now multiple Internet providers in our region. We are able to utilize multiple providers, but are limited by the E-rate rules for redundancy. For program administration, I would like to see the PIA process improved. I have been working with E-rate for more than 5 years. There has never been any consistency or efficiency to the PIA/application review process. It seems to me that sometimes, applications are approved with no PIA, and others are given a high level of scrutiny for no apparent reason. Thank you for allowing applicants to make their voices be heard through this survey.
453. It would be wonderful if it covered filtering and antivirus software.
454. CBRS equipment, band licensing, endpoints, and servers.
455. Option for "automatic/renewal" filing for multi-year contracts.
456. Ideally the program should be open to support more types of technology schools need to operate. It would also be great if we spent less time and effort on compliance and instead maximized the amounts available to the schools that could use the funding
457. It would be great to have Security devices as eligible (cameras, door access, etc.)
458. Our E-rate Coordinators were fantastic to work with!
459. I would like the opportunity to give specific recommendations to USAC about navigability and user-friendly changes they NEED to make in EPC. I wish they would ask us for those types of suggestions.
460. Firewall Maintenance contracts for the software that makes the firewall functional should be at the same fund rate as the hardware. For without the software the firewall is not of much use. Internet filtering should be an eligible service since it is a requirement for all other eligible services. Being able to adjust applications within a budget year would be helpful as needs and budgets can change drastically (ie pandemic)
461. For competitive bidding, it would be better if you could reach out and solicit your own bids in addition to waiting for bids from the 470 posting on the EPC portal. In rural areas, there are fewer if any responses to a 470 posting. I feel if we were allowed to request bids from a provider of our choosing combined with what is received from the 470 listing that we could save the district money as well as the E-rate program.
462. Fix EPC. Navigation is poor. The search feature is useless. Menu items are not always indicative of the content.
463. USAC does not care about schools, they are only looking to deny schools for issues relating to their applications
464. The process of only applying for E-rate one time a year is an outdated system. The process should be open more times in a year. It was based on an old paper system. Discounting the maintenance on firewall software that keeps them up dated to as cost allocation of 15% makes no sense. Without the software maintenance the firewall is useless. It encourages waste as it would be cheaper to buy a new firewall. After three years.
465. There are so many hoops to jump through. The reason most of us have E-rate consultants is because the process is so laborious and complicated. I fully understand that we need checks and balances and a trail to audit but there are so many rules and complicated processes it is so difficult to navigate. Additionally, we need flexibility on what we can use the funding for. We need to include classroom technology hardware that has a direct impact on learning to be considered for E-rate funding. For example, end user devices that connect to the Internet that assist in student learning should qualify. It is fantastic that we have funding to build out wonderful networks and connectivity but when there is nothing to connect to it, that poses a problem.
466. The E-rate process should be streamlined. Money that goes toward a very specially skilled consultant to file for E-rate should be going directly to schools and libraries.
467. I have mixed feelings about EPC; I like the fact that it has reduced the hard copies but it still is hard to navigate.
468. The lack of responsiveness from USAC to PQA/audits/inquiries for our district has been horrible. We received the first inquiry about our FY20 funding in July 2020 and we received our FY20 funding in February 2021. We went through 5 different auditors before we finally got through the process. There has to be a better system for making a complaint about the process.
469. Providing at home Internet connectivity is essential for students. Student learning now spans outside of the walls of the classroom. Districts should be allowed to not only extend Internet access for "off-campus" use, but should have options through the E-rate program to connect these students as necessary. Districts should not be limited to subscription services through traditional carriers. Having the option to use Category 2 funds to build private LTE networks such as CBRS should be allowed. This could be one example of a cost effective model to achieve this.
470. The highest need for us would be to have Security included in E-rate.
471. The competitive bidding program has not lowered our Internet cost due to a lack of competition in our area. We would need more companies to build out fiber networks in our area in order to get lower bids.
472. We are asked for the same information over and over every year for multi-year FRNs. If a PIA review was conducted year one, year two it should be automatically approved. That is what makes the process difficult, time consuming and redundant. I have heard you change PIA agencies every two years? That is a problem also we have to train

the reviewers. PIA Reviewers also ask for validation of Entitites. If the Entitiy was approved last year why do we have to keep submitting documentation. That is also redundant and time consuming. E-rate needs to allow for overlapping of services for when contracts change. We are constantly getting flagged for duplicative services. Yes, I understand that you need to make sure organizations disconnect their old services. Maintenance of equipment needs its own bucket. P2 is reduced enough already that it needs to be saved for hardware.

473. We desperately need assistance with VoIP and wireless phone service in our division. This would open up funds to help us to continue to move our division forward.

474. Please allow LEAs to fund at home connections for students. Also, please fund self built/ managed LTE and other wireless services for at home Internet access.

475. Hot spots and data plans are critical to access and learning in today's education environment. There's a tremendous need for E-rate funding for this. Additional needs include backup Internet and all security efforts (firewall devices and service in Category 1 as well as third party security services).

476. High need for reliable broadband in rural areas

477. The USAC Review process is running incredibly slowly this year (FY2021).

478. E-rate provides critical purchasing support for Internet access components. But for schools, it is mandatory that content monitoring be put in place as well, since the users are under age and their surfing activities need to be monitored and managed in every school in the country. I strongly believe a few content monitoring choices should be added to the E-rate eligible equipment and services list, since every school MUST add this software/equipment to keep

students safe when using the Internet from off-site. Particularly with COVID conditions, schools have had to quickly design and invest in school provided remote access solutions for students and staff, remote instruction components like content monitoring, and especially portable classroom video that works in the teachers classroom or when they are forced to teach from home. Many schools that only needed Internet safety equipment at home now have to ensure children are content filtered off-site as well. Hopefully E-rate could begin to cover some of those costs that schools are being required to incur to educate students safely when off-site.

479. You provide a valued asset to our district. Thank you!

480. The biggest hurdle school districts have with E-rate is that supplemental Internet is not covered. Having a failover connection is vital to keeping digital learning available if there is an outage on your primary circuit.



- USAC should strongly consider making this available to schools.
481. Maintenance and support should be Category 1. Thanks
482. Redundancy is critical for K12 so we'd appreciate consideration for funding in that area. Also, there is an expectation that we will have quality anti-threat services/hardware/software and we could certainly use some financial help and professional guidance in that area.
483. E-rate should also fund hotspot devices to be loaned to customers/students.
484. Our students need reliable Internet at home.
485. Funding for content filtering and end-point computing should be eligible under the E-rate program.
486. Stop making this so hard, and get with the times! It is ridiculous that we have had to spend thousands of local and state dollars to get Wi-Fi jetpacks to our families who can't even get a signal at their homes. Help communities get in better shape with Internet service. It's 2021. The model is there -- Look to what the Roosevelt administration did with electricity way back in the 20s and do what is right by families for education and literacy in this country.
487. No other comments other than the website for EPC is so confusing. It would be nice if it wasn't so hard to navigate through.
488. The QA team may be overworked. Many times our 471s stay in a limbo state after we answer questions and it takes a very long time to find out if we are getting funded or not. This creates stress on the applicant because the E-rate funds are so critical to our success.
489. Servers are critical to executing a full communications package. The fact that they are not eligible is a shortfall.
490. Our state E-rate team is the best!
491. The E-rate program is excellent for assisting schools with funding for district wide Internet access and adapting to change. The largest complaint I have is not solely the responsibility of E-rate but their assistance would make the largest impact given the financial support that it provides. K-12 schools are at an increased risk for cybersecurity attacks. Given my experience in the network and security field prior to working in the K-12 environment I can say school systems large or small are not adequately protected nor have the financial resources to provide the appropriate protection. Cybersecurity tools are expensive since they are geared towards corporate or government operations. School systems have cyber insurance but the cost for certain cyber attacks can drastically outweigh the coverage amount. Schools systems do not have the financial or professional expertise to address a cyber attack without third assistance and funding. To add injury to insult more and more technology companies are moving to a subscriptions based pricing structure which is problematic for schools systems with limited annual budgets in a time where students are transitioning to a virtual learning environment. Traditional public schools are being forced to invest in virtual schools in order to keep up student enrollment. Without high student enrollment funding gets worse. K-12 schools has decide to start their own virtual schools to address enrollment concerns but it also increases their cyber attack risks. Funding for vulnerability management systems, penetration testing, firewalls, anti-virus subscriptions, policy and procedure consulting would all drastically help k-12 schools systems in meeting the federal and state guidelines and protecting the school systems and its stakeholders.
492. Requiring CIPA compliance to get funding but not providing funding to accomplish it is ridiculous. This is often one of the most expensive and difficult for people to accomplish.
493. Relax rule sets on types of access and allow a broader spectrum of equipment to be utilized, like LTE broadcasting localized network etc.
494. We need to be able to use E-rate funds to get the necessary software and equipment to be CIPA compliant. The cost of filtering solutions are going up every year and is a burden for our district.
495. Language and process can be overwhelming for those without an E-rate consulting service. Fees for the consulting service should be also covered as we probably wouldn't be able to participate without it.
496. Anything related to getting Internet services to the school district should be covered through E-rate Internet VoIP telephones service and upgrade of telephone and everything we current receive services for
497. Once a 471 has been submitted, it would be nice if more information was available beyond a simple status. My application has been in review for over a month with no change in status and no additional information. More information would allow us better know where we stand.
498. Our E-rate Coordinator and Team ROCK!
499. Thanks E-rate, if it wasn't for your services, the students in our community would suffer.
500. Being a small rural school, without E-rate, many services would not be possible for us. We would like to provide our students with the best possible educational experience.
501. Increased eligibility for "next generation" firewall type devices and software would be very helpful.
502. It is absurd that E-rate does not fund CIPA filtering and cybersecurity tools. It is time to update standards to accommodate modern educational needs.
503. Schools do not have the personnel/resources to manage home access to the Internet.
504. EPC time out is too short, especially for consultants. Better timing by USAC of PQA's, BMIC preliminary reviews, etc., so that they are not due within the application window would greatly help consultants and applicants.
505. VoIP, Switches for security cameras, security products need funding.
506. It would help greatly if E-rate would pay for Salaries to support E-rate eligible equipment. Our schools would benefit greatly if E-rate would help pay for the purchase of student mobile devices (i.e. Chromebooks, 1 to 1 initiatives).
507. We are a very rural community that is just miles away from major high tech centers of the state (Redmond,

Seattle, Bellevue) and nearly 1/3 of our residents can not get broadband services. We supplied hundreds of hotspots during our COVID shutdown. We are just this year a 1 to 1 laptop district, however a large population of our students can not participate in remote class work or online curriculum due to lack of Internet.

- 508. With Internet filtering being mandated, there is no reason it should not be eligible for funding via E-rate. In addition, the greatest risk to each of our organizations is cyber security related, so there should also be an expansion to cover costs related to security audits, services, and hardware. Lastly, more flexibility and guidance related to community broadband would help us to consider new ways to address student home Internet needs.
- 509. E-rate has made it possible for us to provide reliable, strong connections for our classrooms. We need to make sure this support continues and expands to address the increasing needs.
- 510. We need better drop down boxes for the form 470. We need clarification on the drop down boxes within the form 471 (add in Patch cables, fiber patch cable. There needs to be a distinction between cabling and patch type cables).
- 511. Glad to have the E-rate program.
- 512. Need capabilities of downloading Entity data and other types of data to a CSV.
- 513. We are able to sustain the level of Internet service we need only with E-rate funding.
- 514. The process for filing is to time consuming and complicated. We hire a independent contractor to manage the process. This should be an E-rate expense or make the system less time consuming.
- 515. While vital to us, we could not navigate the E-rate system without third-party support. It is too time consuming and complicated for small libraries like ours.
- 516. Thankful for to our State in assisting districts with the State Education Broadband Consortium and mini-bid process.

- 517. Any financial support for circulating hot spots in public libraries would be appreciated.

“Any financial support for circulating hot spots in public libraries would be appreciated.”

- 518. Quality Assurances and the 15 day response window to obvious questions, and unnecessary and brutal inquiries have been exhausting and USAC unhelpful.
- 519. Overall very happy with E-rate. Portal has taken some learning, but the funding help has been critical for us. It has allowed us to expand our technology envelope for all students, making their learning experience much better.
- 520. E-rate has utterly failed to supply funds that were promised to help lower the cost of Internet service to schools in Consortium, in spite of those schools complying with the application processes laid out.
- 521. The process seems to be getting better each year. Good to invest in our communities. Thank you
- 522. Most of the library's E-rate paperwork is handled by a consultant through the state library. This public library is too small to process the information and forms needed for E-rate on its own.
- 523. The program needs to simplify the application process. Greater flexibility is needed for ever changing technology and needs of schools. Requiring schools to determine specific model #'s and identify only one specific contract/ vendor to purchase that product from 12-18 months in advance is far too restrictive. BEAR process needs to process paperwork faster to get funds to schools.
- 524. The E-rate application is so difficult most school districts have to pay a consultant to complete the paperwork. I am a Federal Programs Director who works on many federal grants, but E-rate is a nightmare for me. Simply, I hate it and it consumes more time than any other grant program. It should be pretty straight forward, and it is NOT. The consulting firms hold all the knowledge and they

don't want to do training that will eliminate some of their business. Leveraging funding according to poverty counts is in itself inequitable. Just because a school has few "free and reduced lunch" students does not mean the school district is adequately funded. I see schools with low numbers of F & R kiddos that struggle to maintain daily and annual needs for their students. Thank you for asking,

- 525. The high costs review process is not well thought out. Rural Alaska is high costs and this is well known, yet the reviews continue and asks the same old questions that have been answered repeatedly...
- 526. Content filtering should be eligible. Less scrutiny of expensive firewall equipment and firewall licenses should be eligible. More training for CSB and ability to update entities, administrators, and student counts at CSB and PIA.
- 527. E-rate does a horrible job at reminding people about the deadline windows for your applications and they are not understanding when you miss a deadline.
- 528. E-rate has been very valuable to our district and we wouldn't have anywhere close to the amount of WAN bandwidth, site-to-site connectivity and wireless coverage that we have now if it weren't for E-rate
- 529. YOU HAVE TO FIX PIA and PQA and stop outsourcing those jobs who's staff is under funded. Meaning you hire Contractor, give training and then hope for the best. The HELPDESK experience is flawless, they get it and do. All other aspects USAC are cumbersome, burdensum and often FRUSTRATING.
- 530. I feel that the EPC is difficult to navigate, especially in years that a Form 470 is required.
- 531. Software and subscriptions for firewalls, wireless, etc. should be fully reimbursable using E-rate funds. One of the major costs for maintaining a secure network is having adequate firewall, DDOS, intrusion detection, etc. and the non-funding of that puts student and staff data at risk.

532. Since having a content filter is required, including the content filter as an eligible service makes sense.
533. CIPA compliant filtering is required for the E-rate program, yet is not funded. Filtering should be funded. Advanced network security should be funded. EPC could be much easier to use, though it is certainly an improvement from the paper days. Notices and items with deadlines should be front and center when a user logs in to EPC. A user should not have to navigate through multiple menus to see if there is an inquiry that requires attention.
534. You can be funded after PIA review and still be denied reimbursement during invoice review. This is not right!
535. E-rate has evolved over the years. The process gets smooth and then someone changes it and it gets difficult again. Denials by PIA/PQA with no information on why drives me crazy and makes it difficult to do my work. Replies needed immediately do not take into regard school district responsibilities. I am not always available to reply at the speed requested. There are many unreal expectations of knowing what are on bills by providers and coded in ways that we cannot decipher and yet we get a denial over it without explanation.
536. E-rate has been wonderful for our system. Our two primary issues are: 1: The time between bidding the job and the job taking place. Many time the technology prices will drop and we end up still paying more. 2: Sometimes our Form 471s will sit in limbo for long periods of time with no change or questions about them. This creates much stress on the applicant wondering if he/she did something wrong or if funding is going to happen.
537. How about providing a flat, annual dollar amount to all school districts based on need without having to jump through so many hoops. All schools need the support / funding; just simply provide it! We have a 5 inch 3 ring binder stuffed full of paperwork every year with E-rate documentation. It is very time consuming and stressful to complete all of the requirements.
538. The portal is not designed well and hard to navigate. Voice services should be included because they are not going away and have been a burden to schools since they were phased out. USAC customer service response time has increased significantly.
539. The process of answering feedback requests (PIA) is hideous!!! The forms to answer the questions are majorly flawed and do not work correctly. If I needed to only answer the first two questions because they are the only two to apply to us and hit submit, the form errors out telling me all the other questions must be filled in even though I have no answers to them because they do not apply! So, I make stuff up to enter into them so I can submit the damn PIA review. Speaking of which, WHY am i being reviewed on my Category 1 request? Because of COVID 19 and the fact the state made ALL student lunches FREE all year, we were told to use last years counts for this year, so I did. BOOM!! PIA questions are : Pleasee provide student counts..ok same as last year...Please provide a filled out free / reduced lunch application... what??? ALL lunches are FREE... we don't have and Applications this year!!! So, I send in a last years app. Basically answering the same damn questions that I had to answer last year!!!! What a waste of your and my time!! E-rate should not be like this, I feel like it is your job to prevent me from getting funded at all! Why do you make me reiterate all the information I already gave you and force me to answer information that does not pertain to us on broken forms? You wanted feedback, your getting it! Fix the damn forms, streamline the process and stop with the damn review questions every year on the same things wasting everybody's time!
540. One issue I have is that I am having to install and maintain a separate internal fiber network at my schools in order to properly connect surveillance cameras and other entry detection and security hardware back to my VMS servers at each of my campuses. I have to do it this way or I am forced to cost allocate any port usage on my production network since those switches were purchased using E-rate funds. We need to be able to use E-rate subsidized network switches and internal fiber without having to jump through so many hoops to use our system the way we need to. Thank you.
541. EPC is so difficult to use that when I call for help, I receive the wrong answers. Even their own staff can't figure it out. It's designed by and for tech geeks, not the public. Every step of the way, I have to look up definitions and figure out jargon.
542. The E-rate program is absolutely vital to our district success and deeply appreciated. As a rural district, there is concern about broadband connectivity to the homes that I think the FCC can address with the adjustments to current mechanisms. Regarding EPC, in the past the system would email me when a notice for PIA info request was in system, but this year it did not. I just happened to check EPC and found an almost expired requests. I don't know if this change was deliberate, a side-effect of another change or I missed the information about the change. There might be others that relied on the emails to check EPC.
543. The portal is very difficult to navigate as an organization that cannot afford to hire outside help to complete the application process. The directions are not clear, links are complicated and difficult to return to. This site was not made for a small organization with a limited budget for tech staffing.
544. Many times the PIA reviewers do not understand what they are requesting nor are they able to answer questions pertaining to inquiries. EPC is a bit difficult to navigate.
545. The application process and rules are so complex that we need to hire a third party vendor to help with our E-rate filings each year. If the process was really user friendly we would not need to hire a company to help us with this process. Many of the PIAs we receive make me believe that the information we send in and file is

not even being read due to the nature of some of the questions we receive. This process is not user friendly and as is the case with any federal program it is labor intensive and difficult to keep up with the changing rules. This is why millions of dollars of funding that are allocated to school go unused each year. With the dependence on Internet connectivity for the delivery of instruction school district should be able to get reimbursed for redundant Internet connections.

546. My library receives a funding commitment letter and then does not receive funding!
547. The email process to setup a new Account Administrator is very time consuming for staff who are too busy to deal with timely emails and expiring passwords. They assign other staff to handle these but changes to administrators causes this issue again. It was easier when we only had to place a piece of paper in front of them for a signature than having them manage access to the portal.
548. USAC should assign the same person/reviewer to the individual school districts' entire applications to reduce the number of questions on inquiries and potentially move things along quicker for the district instead of issuing FCDLs a few at a time for the district.
549. Personally an escalation process during PIA before denials of service to avoid a waiver or appeal. Along that line even during the process have more managers available; be able to get CSB to cooperate with giving out those names. The turnover for reviewers is significant and don't always have enough knowledge to make a good decision.
550. The E-rate program has enabled our library to meet the needs of underserved individuals in our community who rely on our Wi-Fi as their sole source of connectivity. Due to our geographical location, we are often the only Wi-Fi available.
551. We've been using E-rate for almost 10 years now...it has given us more tools/options in teaching students and giving them better access to the education they need. Thanks!

552. Question 23-We are already upgrading if approved for 2021-22

553. Networking is important to this library but as a library director I do not have the specialized skills and knowledge needed to manage a network. I need help the most with this issue. This library is a small, rural library and cannot afford to hire a full-time computer technician to be on staff. Also, because I only submit the E-rate forms once a year, it is difficult for me to master the EPC portal. If it were not for the state library's E-rate coordinator, I couldn't manage all of the drop-down menus. Thank you for your support.
554. The application process is often confusing.
555. Please make a simple form. We are a small school and struggle trying to complete all the correct forms. Isn't there a streamlined process that could be created?
556. The consortium process needs to be easier. We are a part of an Internet (Category 1) consortium which has substantially lowered the cost of providing Internet to schools. This process is clunky but should be the preferred path for E-rate to get the most cost effective Internet. When filing as a consortium, it would be nice to have more services qualify into Category 1 based on the volume/scale of discounts that become eligible by filing together. Things like advanced firewalling, antivirus, and web filtering could be available in Category 1 when filing as a consortium and allowing all of those services to be bundled.
557. EPC can be a very cumbersome tool and is really not intuitive. For people that only use it once or twice a year, it is very difficult to navigate.
558. We are a very rural school, therefore we do not have connectivity in all of our homes. We need a better fiber backbone in our area so Internet service providers would be willing to help.
559. Works well for the most part but should include more access and support for network security.
560. Would love it if analogue Private line service - connections to

emergency services such as police and fire would be eligible for E-rate.

561. We are so grateful for the funds that enable us to provide Internet to our school in a rural area where fiber is not yet available!
562. I have not received funding for 2 schools for FY2019 and 2020 because they are stuck in USACs review system. I have been through customer service with no actionable response. Very dissatisfied. How can I apply for Category 2 for the coming year when I don't have any idea what will be approved from 1-2 years ago?!
563. Is there some way to improve the RAL process? Compare to the rest of the EPC processes it needs to be simplified and process needs to be improved.
564. I love the current method for funding Category 2 funds, it allows EVERYONE the opportunity to apply and should remain as the method for dispersing those funds.
565. With the coming of 100% mandatory online high stakes testing, a redundant Internet connection from a second source utilizing a separate and distinct path to my district will become a necessary expenditure. Redundant access would help "backhoe proof" our network by eliminating the single point of failure.

"With the coming of 100% mandatory online, for high-stakes testing, a redundant Internet connection from a second source utilizing a separate and distinct path for my district will become a necessary expenditure."

566. There are timelines for applicants but it takes way too long for E-rate to commit to an application.
567. USAC should be encouraged to allow schools to purchase domain controllers (servers) with E-rate money. I've been doing E-rate applications since the 2nd year

they were available. It has gotten increasingly complex. Over the years, it feels like the FCC has taken more and more away from the E-rate program that schools need. I'm happy that finally there was an increase in the Category 2 budgets. This will help immensely in providing funding for ALL schools. I work with many rural schools with 8 to 250 students. This budget increase will make a huge difference in them being able to upgrade their networks. In terms of the application process, the EPC isn't difficult for me to use, but it wouldn't be easy or intuitive for a new user. It has gotten increasingly complex to

the point that most schools (small) don't have personnel who can navigate the EPC and application process. This needs to change. Tutorials on each step of the application process should be made available. I do appreciate the customer support people who generally are able to answer my questions. That is helpful in the application process. In terms of eligible services, digital equity needs to finally take place so that students and teachers can access resources at home to meet their educational needs. Overall, the schools that I work with are very thankful (and dependent) on the E-rate program. I hope

to see increased growth and the re-establishment of funding for services (Ex. telecommunications) that have been eliminated over the years. Thanks for allowing me to share my perspective.



Professional Standard of Conduct

FFL has established and implemented several self-imposed professional consulting standards for our employees. Although no formal regulation exists governing E-rate consultants, FFL voluntarily complies with the following Code of Conduct, Code of Ethics, and Code of Client confidentiality.

CODE OF CONDUCT

FFL understands that conflicts of interest or the appearance of impropriety can negatively impact customer trust and/or E-rate application success. Therefore, FFL has a comprehensive Code of Conduct to which its staff complies.

Below are several key elements of this code:

FFL does not sell or offer any E-rate eligible services.

FFL does not have a SPIN (Service Provider Identification Number).

FFL does not prepare technology plans.

FFL does not advise clients on what technology to procure or from whom to purchase it.

FFL does not receive payment from service providers based on their sales to applicants.

FFL first developed a formal, internal code of conduct. In 2004, FFL became the first E-rate consultancy to publish a code of conduct and to submit itself to public accountability in this matter.

CODE OF ETHICS

FFL is a founding member of the E-rate Management Professionals Association (E-mpa®). This association has developed a comprehensive Code of Ethics for E-rate consulting firms. This Code of Ethics is based on similar codes established for Certified Public Accountants. As a member of E-mpa®, FFL agrees to comply with the E-mpa® Code of Ethics.

Funds For Learning

Funds For Learning®, LLC (FFL) is an advocate for the use of educational technologies and student Internet access. Formed in 1997, FFL is a professional services firm that focuses on E-rate funding management and compliance support. Each year, FFL's work directly supports millions of students and library patrons throughout America.

www.FundsForLearning.com

