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HWC Consultants is an E-Rate consulting firm based out of San Francisco, CA. We're writing with comments about the proposed E-Rate competitive bidding portal and to express our concerns about how the proposal might affect our clients' ability to take advantage of E-Rate funding, and our own ability to properly serve their needs.

Our primary concerns are as follows:

- The proposed idea of restricting the review of bids until the end of the 28-day competitive bidding period would make the Form 471 deadline too difficult to meet. Despite our best efforts, many clients – including new ones – can't file Form 470s until February, occasionally days before the deadline to meet the minimum 28 days. As consultants, we need to be able to see what bids are coming in (or what's *not* coming in), where errors may be in bids, etc. so that we can be proactive enough to have plenty of time to meet the Form 471 deadline. If we are rushing to review all bids at once in order to meet the Form 471 deadline, this will impact our ability to receive, process, and select quality bids.
- We're concerned about how the competitive bidding portal may disadvantage smaller service providers who already struggle to compete with bigger providers, like CDW-G (who have the internal capacity to learn and adapt to new rules and requirements related to the program). For smaller providers, the E-Rate process can be bureaucratic and daunting, and we're concerned that this new portal may deter them further from participating. Given that we regularly hear that the complexity and time-intensive nature of the program are small service providers' biggest concerns about the program, we fear this may only exacerbate that perception.
- Similarly, we're concerned about how this may disadvantage applicants who will potentially have to pay us or other consultants higher fees to participate in the program. If we as consultants are spending more time adapting to the new bidding portal and potentially working more intensive hours to meet E-Rate deadlines as a result, that will inevitably increase applicant cost for consult work. For schools who don't use consultants, they may decide that it's not worth it to spend staff hours applying for the program with the additional layer of bureaucracy. This may mean that some schools can't or don't participate in the program at all. Much like we hear from service providers, applicants regularly say when they come to us for a consult that they either have never applied before or tried to apply and gave up because of the aforementioned complexity and time-intensive nature of the program; again, we fear this may only exacerbate that perception.
- We're concerned how the bidding portal may affect more complex Form 470s/RFPs that include requests for job walks, interviews, etc., and which require communication between providers and schools during the competitive bidding process.