FUNDS FOR LEARNING
YOUR E-RATE GUIDES

2575 Kelley Pointe Parkway, Suite 200
Edmond, OK 73013

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

www.FundsForLearning.com

March 11, 2024

VIA ELECTRONIC COMMENT FILING SYSTEM

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: *Ex Parte Notice*
          Schools and Libraries Cybersecurity Pilot Program, WC Docket No. 23-234
          Addressing the Homework Gap through the E-rate Program, WC Docket No. 21-31
          Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6
          Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

On Thursday, March 7, 2024, representatives of Funds For Learning LLC ("FFL") met with Marco Peraza, Wireline Advisor for the Office of Commissioner Simington to discuss the Cybersecurity Pilot Program Notice of Proposed Rulemaking ("*Cybersecurity Pilot NPRM*"),[1] the Notice of Proposed Rulemaking for off-premises use of Wi-Fi hotspots ("*Wi-Fi Hotspots NPRM*"),[2] and the Further Notice of Proposed Rulemaking on proposed changes to improve the E-rate program (*"E-rate FNPRM"*).[3] FFL representatives in attendance were John D. Harrington, CEO, Catherine Cruzan, President, and Brian Stephens, Director, Stakeholder Engagement.

Cybersecurity Pilot NPRM

FFL reiterated our support for the cybersecurity Pilot and shared the following suggestions:

- The FCC should implement the Pilot using a shorter timeframe, such that there is ample time to enact permanent changes to the E-rate program by Funding Year 2026, the start of a new Category Two budget cycle. An initial round of funding applications will yield quality data about the scope

---

[1] *Schools and Libraries Cybersecurity Pilot Program*, WC Docket No. 23-234, Notice of Proposed Rulemaking (Nov. 8, 2023) ("*Cybersecurity Pilot NPRM*").

[2] *Addressing the Homework Gap through the E-Rate Program*, WC Docket No. 21-31, Order, FCC 23-91, 2023 WL 8602208 (Nov. 8, 2023) ("*Wi-Fi Hotspots NPRM*").

[3] *Schools and Libraries Universal Service Support Mechanism; Federal-State Joint Board on Universal Service; Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, CC Docket Nos. 02-6, 96-45, 97-21, Report and Order and Further Notice of Proposed Rulemaking, FCC No. 23-56 (July 21, 2023) ("*E-rate FNPRM*").

of school and library cybersecurity needs. A three-year Pilot is not required, nor is it likely to yield significantly more or higher quality data than could be gathered in one year. Indeed, given the pace of change in cybersecurity, it is likely that specific cybersecurity solutions could evolve significantly over the span of three years.

- The FCC should set a funding allocation of $312.4 million for the Pilot program. This figure represents enough funding to support a sample size of 5% of all E-rate applicants, based on a cybersecurity cost analysis performed by the Consortium for School Networking (CoSN) and FFL.[4]

- The Commission should allow applicants to request discounts for all cybersecurity related goods and services for which they have need, and the Commission should refrain from limiting the scope of the Pilot program's eligible services list. The goal of the Pilot should be to gather information about the range of services and products used to secure school and library networks. A predetermined list of goods and services would reduce the effectiveness of the pilot, whereas a broad application pool will result in a more comprehensive set of data regarding applicants' cybersecurity needs.

- The Commission should fully fund modern firewalls via the current E-rate program without waiting for information from the cybersecurity Pilot.

- Including cybersecurity in the E-rate program will increase transparency and competition for these goods and services in the future. This should result in reduced costs and improved services for cybersecurity in the same way that the E-rate program has supported lower costs for internet bandwidth and Wi-Fi equipment.

Wi-Fi Hotspots NPRM

We encouraged the Commission to offer E-rate discounts for Wi-Fi hotspots and to extend that support beyond cellular Wi-Fi to include functionally equivalent technologies, provided they are determined to be cost-effective options.

Based on an analysis of Emergency Connectivity Fund (ECF) program data, FFL estimates that adding Wi-Fi hotspot products and services to the E-rate program's Eligible Services List would increase the annual demand for E-rate funds by approximately $197.5 million. Based on the average E-rate discount rate of ECF participants used for analysis, the non-discount amount paid by applicants for Wi-Fi hotspot service would be approximately $83.7 million.

E-rate FNPRM

FFL supports a number the E-rate program changes suggested in the E-rate FNPRM. Specifically, we discussed:

- The Commission should allow applicants to submit one-time funding requests for one-time charges when purchasing multi-year software-based maintenance services. This is consistent with how the services are typically purchased. Making this change would significantly reduce the

---

[4] https://www.fcc.gov/ecfs/document/102081871205710/1

complexity of the E-rate funding application process for Category Two services but would not result in an increase in demand for E-rate funds.

- The Commission should eliminate the Category Two "subtypes" of Internal Connections. Having subtypes (i.e., "Basic Maintenance of Internal Connections" and "Managed Internal Broadband Services") results in complexity that does not add value to the program, leads to unnecessary funding denials, and overly complicates the competitive bidding process for service providers.

- The Commission should adopt a 15-day "grace period" for the deadlines associated with certifying FCC Forms 472 and 474. This approach would reduce the number of invoice deadline waiver requests submitted to the Commission.

2023 E-rate Applicant Survey

During the meeting, we shared selected results from FFL's 13th annual E-rate applicant survey. Conducted in April through June of 2023, we received 2,110 responses from schools and libraries across the country, correlating to approximately 10% of the total applicant population in Funding Year 2023. Highlights from the 2023 survey include:

- 95% applicants responded that the E-rate program is vital to achieving their internet connectivity goals. A similarly high result has been recorded in past years of the survey.

- 93% of applicants believe that the E-rate program should support *comprehensive* network security products and services. Over the past five years, more than 95% of respondents indicated that network security services should be eligible for Category Two funding.

- 74% of the applicants responding to our survey stated that insufficient home internet access is a significant issue in their community.

- 85% of applicants believe that the program is accomplishing its goal of maximizing the cost-effectiveness of E-rate-funded purchases.

- Our survey included more than 550 comments from schools and libraries. The need for cybersecurity was expressed in a large number of comments, and applicants also express gratitude for the opportunities afforded by E-rate funding for high-speed internet access.

We provided hardcopy versions of our 2023 E-rate Trends Report for the Commission's review. A digital version is included in this *ex parte* filing.

Respectfully submitted,

/s/ John D. Harrington

John D. Harrington
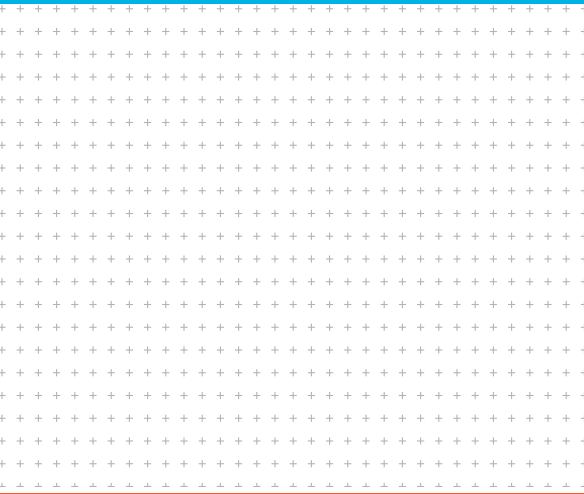
Chief Executive Officer

Funds For Learning LLC
2575 Kelley Pointe Parkway, Suite 200
Edmond, OK 73013
jharrington@fundsforlearning.com
(405) 341-4140

cc: Johnnay Schrieber

Enclosures

E-rate Trends Report

The 2023 E-rate Trends Report

ABOUT THE E-RATE DISCOUNT PROGRAM

The Schools and Libraries Universal Support Mechanism, commonly referred to as the E-rate program, provides discounts to eligible entities in the United States towards the purchase of goods and services necessary to connect K-12 students and library patrons to the Internet.

ABOUT THE ANNUAL TRENDS REPORT

The E-rate program supports nearly every school and library in America, annually providing billions in dollars of much needed support for Internet access and computer networking. More than 21,000 applicants and 3,700 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 is derived from publicly available funding request data as well as a nationwide survey of applicants conducted in June 2023. All information is current as of August 1, 2023.

This report is not intended to be an encyclopedic review of the program. There are many additional statistics and reports that could be presented. 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.

A NOTE FROM JOHN HARRINGTON

FOR THE PAST 26 YEARS, THE E-RATE PROGRAM HAS PROVIDED crucial funding to bring high-speed Internet access to our nation's K-12 schools and public libraries. Its impact is truly astounding, enabling countless students and educators to explore new frontiers of learning and research. By leveraging broadband-powered technologies, we have transformed the educational landscape, fostering multiple generations of innovative thinkers and leaders.

In this report, you will find an in-depth analysis of the E-rate program's accomplishments, highlighting the remarkable progress that has been made toward connecting schools and libraries. But now is not a time for rest. The results of the 2023 applicant survey make clear the immediate and substantial need for cybersecurity in today's educational institutions, with E-rate applicants advocating for proactive approaches toward safeguarding our students and library patrons. Respondents to the survey also consider ways to enhance the E-rate application process, aiming for a more efficient and user-friendly experience for all stakeholders.

By addressing these challenges head-on, we can pave the way for an even brighter future for education in our nation. Together, we can build upon the success of the E-rate program and work tirelessly to create a secure, connected, and innovative environment for our students and library patrons.
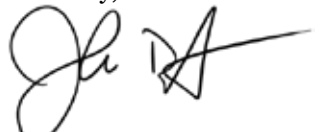
Sincerely,

John D. Harrington
CEO, FUNDS FOR LEARNING

Table of Contents
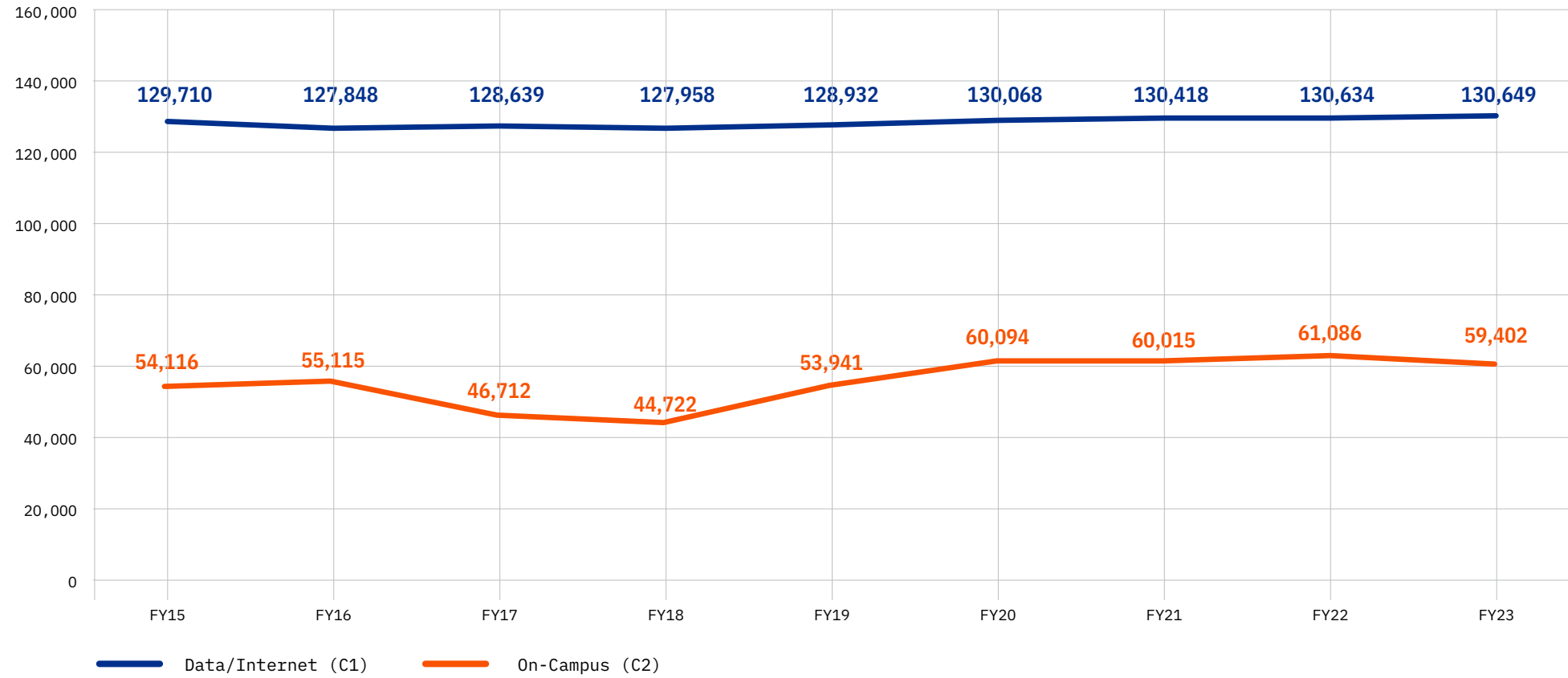
The 2023 Request Data

E-RATE FUNDING REQUEST DATA IS PUBLICLY available and provides unique insight into the broadband needs of schools and libraries. The data includes an applicant's name, its service provider(s), E-rate discount rate, and the category of the goods and services requested (internet access, internal connections, and so on). It also includes detailed line item information for each funding request, such as circuit counts, connection speeds, unit quantities, and make and models of equipment.
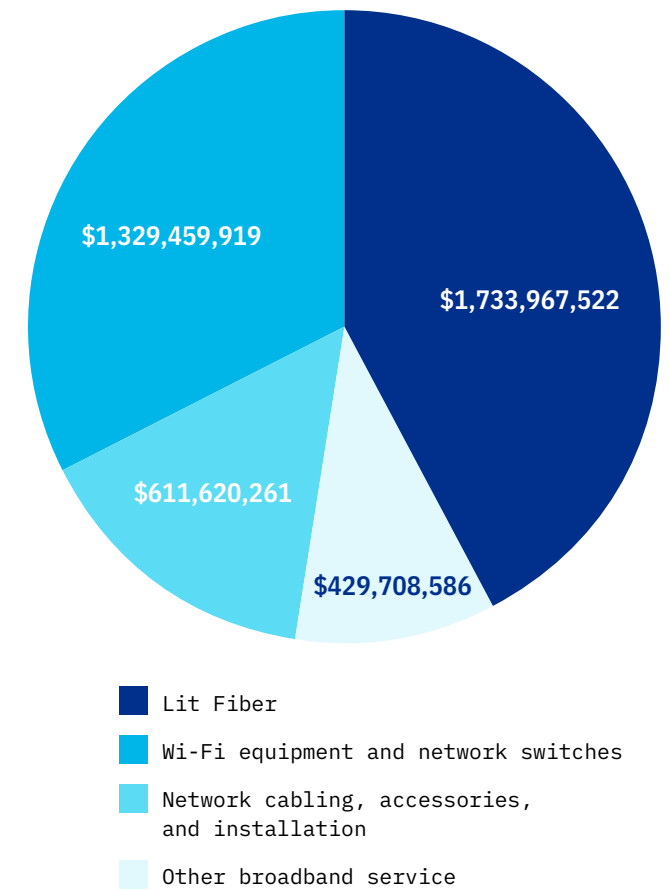
Funding request details can change over time as the E-rate program administrator reviews applications and issues funding decisions. The information in this report is based on Funding Year 2023 applications as originally filed, prior to any modifications or reductions made during the review process.

SITES RECEIVING E-RATE SUPPORT
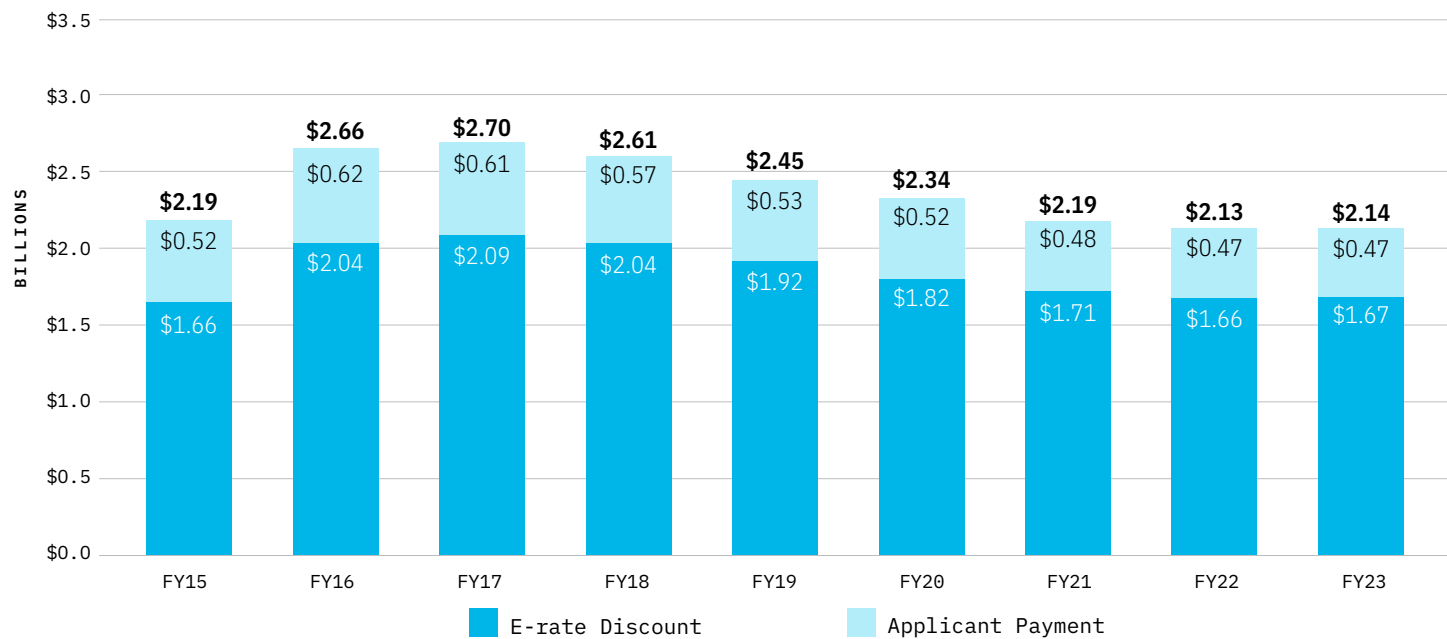# Sites Listed on Applications by Service Category

	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY23
Data/Internet (C1)	129,710	127,848	128,639	127,958	128,932	130,068	130,418	130,634	130,649
On-Campus (C2)	54,116	55,115	46,712	44,722	53,941	60,094	60,015	61,086	59,402

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

ALLOCATION OF FY2023 E-RATE FUNDED SERVICES AND PRODUCTS

- $1,733,967,522
- $1,329,459,919
- $611,620,261
- $429,708,586

■ Lit Fiber
■ Wi-Fi equipment and network switches
■ Network cabling, accessories, and installation
■ Other broadband service

E-RATE INTERNET AND DATA SERVICES
"C1" Internet Access and WAN Services

BILLIONS

	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY23
Total	$2.19	$2.66	$2.70	$2.61	$2.45	$2.34	$2.19	$2.13	$2.14
Applicant Payment	$0.52	$0.62	$0.61	$0.57	$0.53	$0.52	$0.48	$0.47	$0.47
E-rate Discount	$1.66	$2.04	$2.09	$2.04	$1.92	$1.82	$1.71	$1.66	$1.67

■ E-rate Discount   ■ Applicant Payment

E-RATE ON CAMPUS WI-FI AND LAN
"C2" Local Area Network Infrastructure and Service

BILLIONS

	FY15	FY16	FY17	FY18	FY19	FY20	FY21	FY22	FY23
Total	$1.92	$1.47	$1.10	$0.94	$1.25	$1.48	$1.78	$2.11	$1.85
Applicant Payment	$0.47	$0.43	$0.31	$0.28	$0.35	$0.40	$0.49	$0.57	$0.52
E-rate Discount	$1.46	$1.04	$0.79	$0.66	$0.90	$1.08	$1.29	$1.54	$1.33

■ E-rate Discount   ■ Applicant Payment
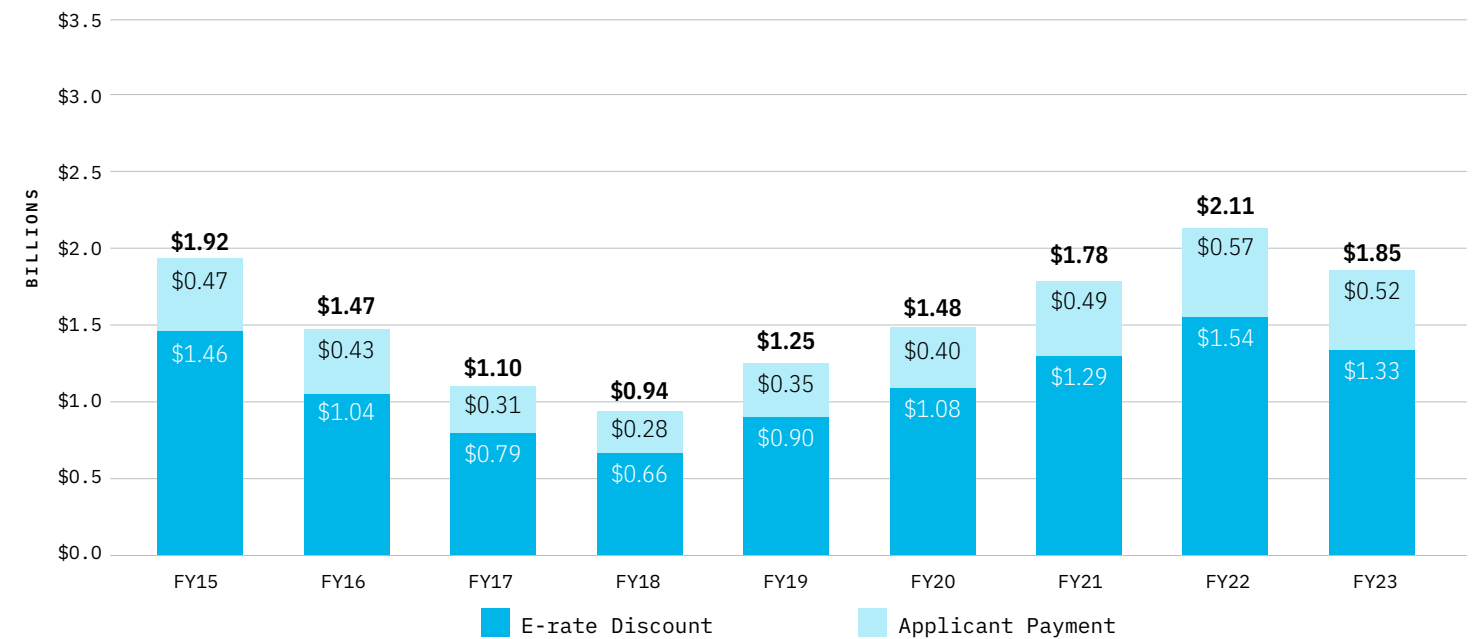
2023 E-rate Trends Report

IN JUNE 2023, FUNDS FOR LEARNING CONDUCTED its 13th annual E-rate survey, designed to gather feedback and insight from the schools and libraries who participate in the program. The survey is necessary because E-rate funding request data paints 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 feedback, related to specific USAC actions or decisions. There is no forum for applicants to express what is working well.

KEY TAKEAWAYS

1. **E-RATE SUCCESS:** More than 88% of survey respondents recognize the benefits of the E-rate program, highlighting faster internet connections and increased student and library patron connectivity as direct outcomes. In addition, 95% of respondents view E-rate funding as essential to their organization's Internet connectivity goals, demonstrating the program's critical role in educational and library institutions.

2. **THE NEED FOR CYBERSECURITY:** Cybersecurity emerges as a prominent theme, with respondents emphasizing its importance. This reflects a broader trend in K-12 education, underscoring the need for secure digital learning environments.

3. **STREAMLINING THE E-RATE PROGRAM:** There are concerns about the program's complexities and inefficiencies of its procedures. Respondents have highlighted challenges in the review process and reimbursement delays, suggesting a need for more transparency and streamlining.

4. **DIVERSE FEEDBACK:** The open-ended comments contain a wealth of experiences and insights. While there is broad agreement on the program's value, respondents' varied experiences point to areas that can be refined to better meet the diverse needs of schools and libraries.

E-rate Success

The E-rate program has proven to be a resounding success since its inception, and survey respondents across the country agreed that the program is essential for ensuring that schools have access to reliable and secure internet connectivity. Many respondents expressed appreciation for the financial support the program provides to connect schools and libraries to high-speed internet access, particularly in low-income areas.
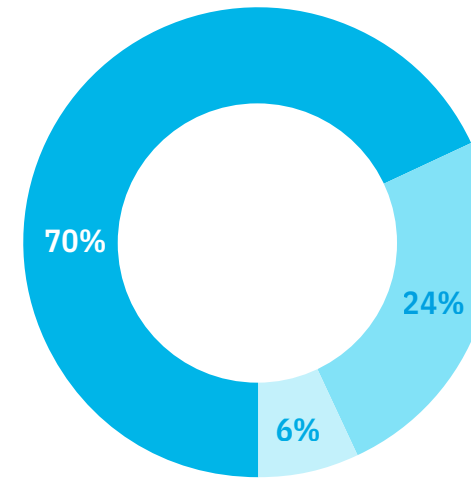
"E-rate has been crucial in helping our schools access higher speed internet at an affordable rate."
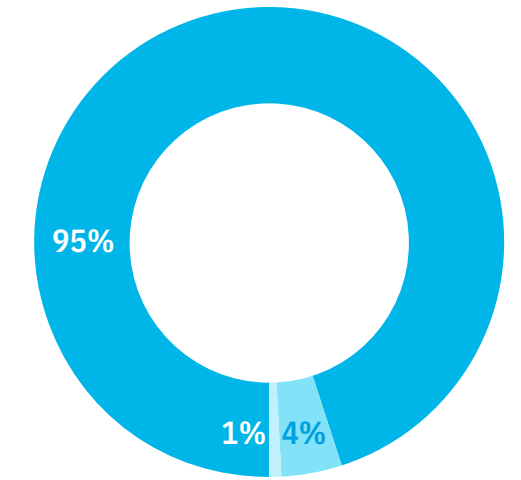– ARIZONA SCHOOL DISTRICT

"E-rate is a lifesaver for our tiny, rural library. We would not be able to afford equivalent internet services without it."
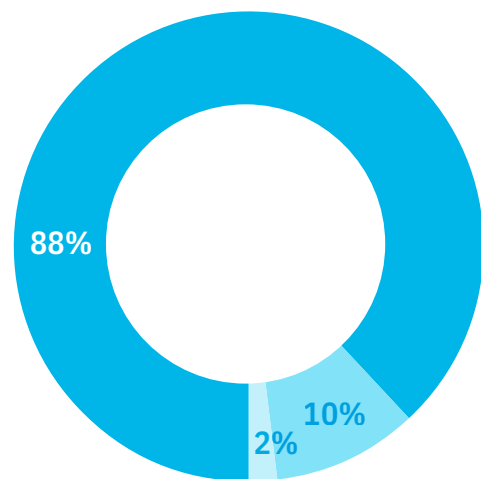– IDAHO LIBRARY

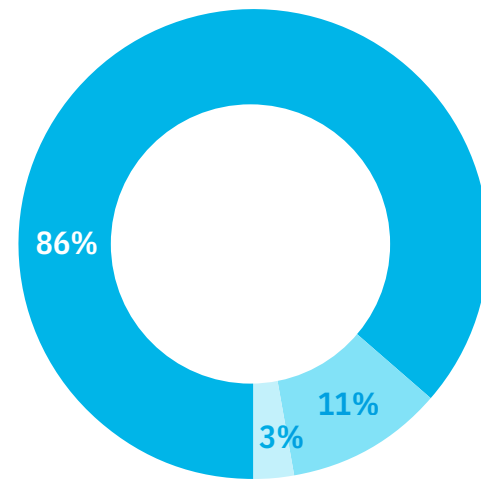## The E-rate competitive bidding process lowers our prices.

70%
24%
6%

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

95%
1% 4%

We have faster internet connections to our site(s) because of the E-rate program
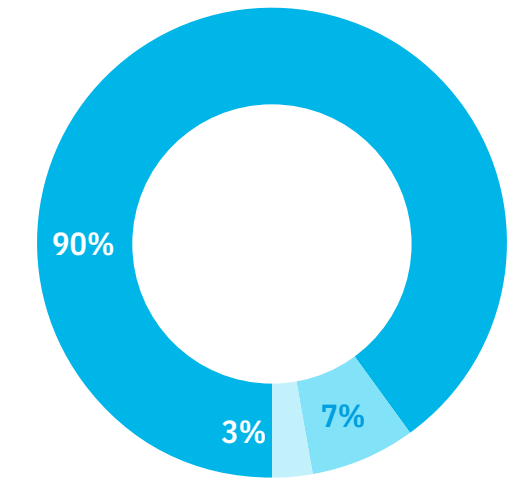

88%
10%
2%

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

86%
11%
3%

" E-rate has been our lifeline to achieve a robust internet connection ubiquitously throughout our school division. "
– VIRGINIA SCHOOL DISTRICT

Our organization can depend on E-rate funding every year.
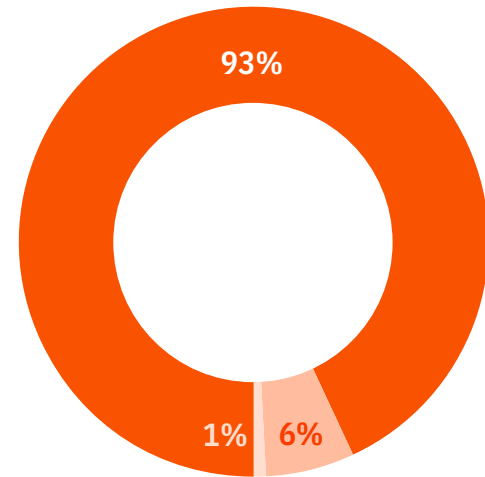

90%
3%
7%

Legend:
- Agree & strongly agree
- Neither agree nor disagree
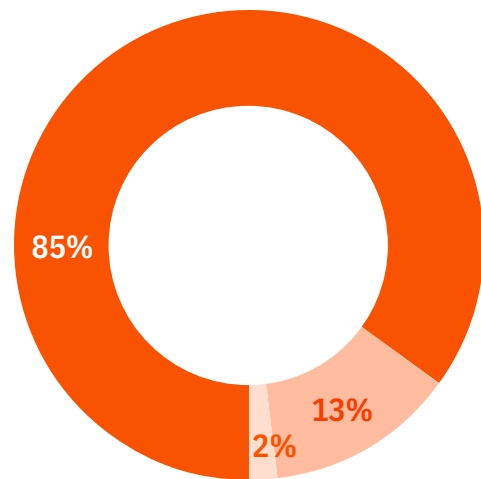- Disagree & strongly disagree

FCC Goals

In 2014, the Federal Communications Commission adopted three goals for the E-rate program: ensuring affordable access to high-speed broadband sufficient to support digital learning in schools and robust connectivity for all libraries; maximizing the cost-effectiveness of spending for E-rate supported purchases; and making the E-rate application process and other E-rate processes fast, simple and efficient. A significant majority of survey respondents believe that the E-rate program is accomplishing its broadband access and cost-effectiveness goals, while opinions on the ease of the application process are mixed.

GOAL #1: **Ensuring affordable access to high speed broadband sufficient to support digital learning in schools and robust connectivity for all libraries.The E-rate program is achieving this goal:**

- 93%
- 1%
- 6%

GOAL #2: **Maximizing the cost-effectiveness of spending for E-rate supported purchases. The E-rate program is achieving this goal:**

- 85%
- 2%
- 13%

GOAL #3: **Making the E-rate application process and other E-rate processes fast, simple, and efficient. The E-rate program is achieving this goal:**

- 22%
- 56%
- 22%
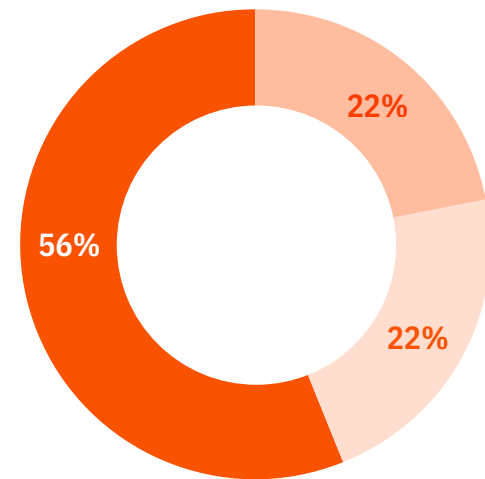
- Agree & strongly agree
- Neither agree nor disagree
- Disagree & strongly disagree

The Need for Cybersecurity

For the past six years, more than 95% of the respondents to the annual applicant survey have indicated that network security and management products and services should qualify for Category Two funding. In December 2022, the Federal Communications Commission issued a Public Notice seeking comments on the potential use of the E-rate program to support next-generation firewalls and other network security services. The response was significant, with hundreds of comments submitted by schools, libraries, service providers, manufacturers, consultants, and industry groups. Support for adding cybersecurity products and services to the E-rate program's eligible services framework was nearly unanimous. Commenters expressed well-researched examples of the real-world financial and social impacts of network security breaches, ransomware attacks, and other cybersecurity incidents, and urged the FCC to take action quickly.

"As a member of a Cyber Response Team, I have seen many incidents that have come through that would be solved just by having even basic cybersecurity protections in place, protections that are expensive for school districts to purchase."
– WISCONSIN SCHOOL DISTRICT

"Cybersecurity solutions should be eligible. Since school districts and smaller organizations are typically targeted for ransomware attacks and we have limited budgets already, it would help us protect our students information and help maintain operations since it would prevent our network from going down."
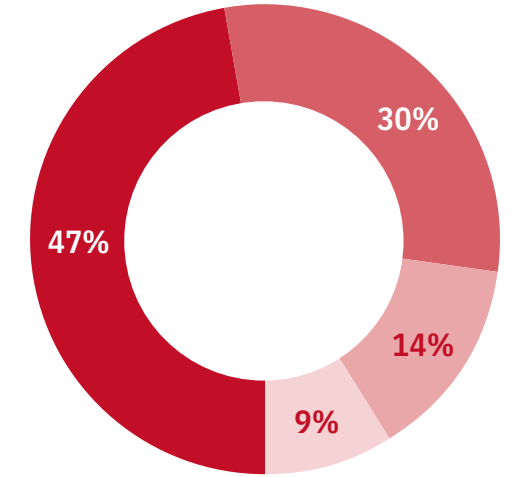– SOUTH CAROLINA SCHOOL DISTRICT

The E-rate program should provide support for comprehensive network security solutions.
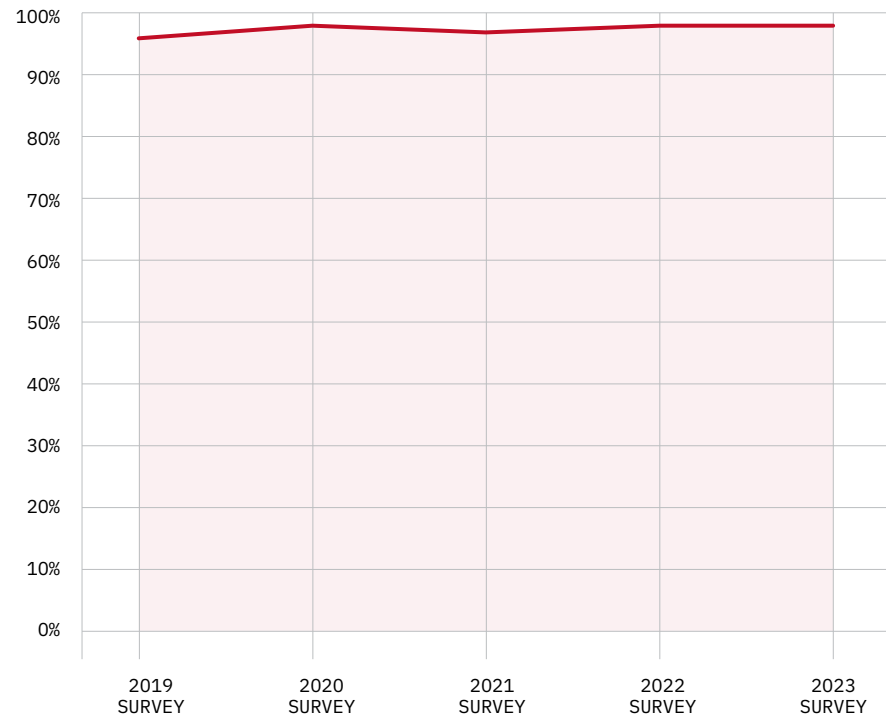
93%
1%
6%
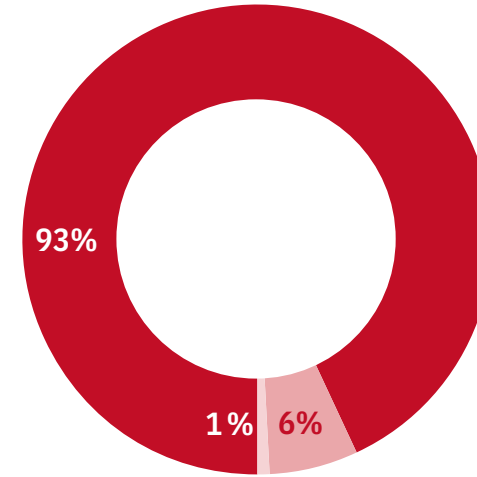
- Agree & strongly agree
- Neither agree nor disagree
- Disagree & strongly disagree

My organization's most recent major investment in cybersecurity products or services was:

30%
47%
14%
9%

- Less than one year ago
- 1-2 years ago
- 3-5 years ago
- More than 5 years ago

Annual applicant survey: should cybersecurity be eligible for Category Two discounts?

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

2019 SURVEY | 2020 SURVEY | 2021 SURVEY | 2022 SURVEY | 2023 SURVEY

My organization has a specific line item in its annual budget for cybersecurity products and services.

52%
48%
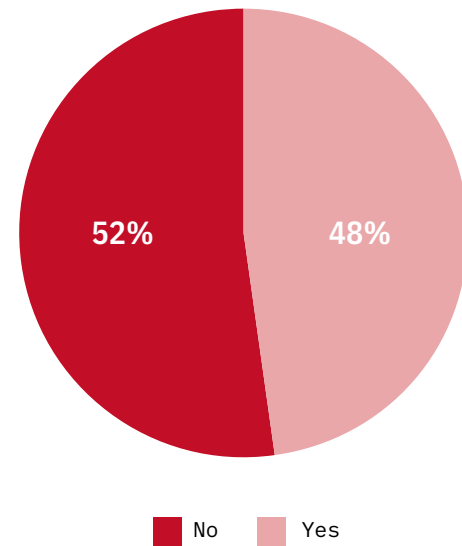
- No
- Yes

Which cybersecurity services should qualify for E-rate funding?

100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%

91%	88%	87%	73%	71%	64%
Next-generation firewalls	Intrusion detection/prevention	Content/malware filtering and DNS security	Endpoint security	Cybersecurity education and training	Multi-factor authentication
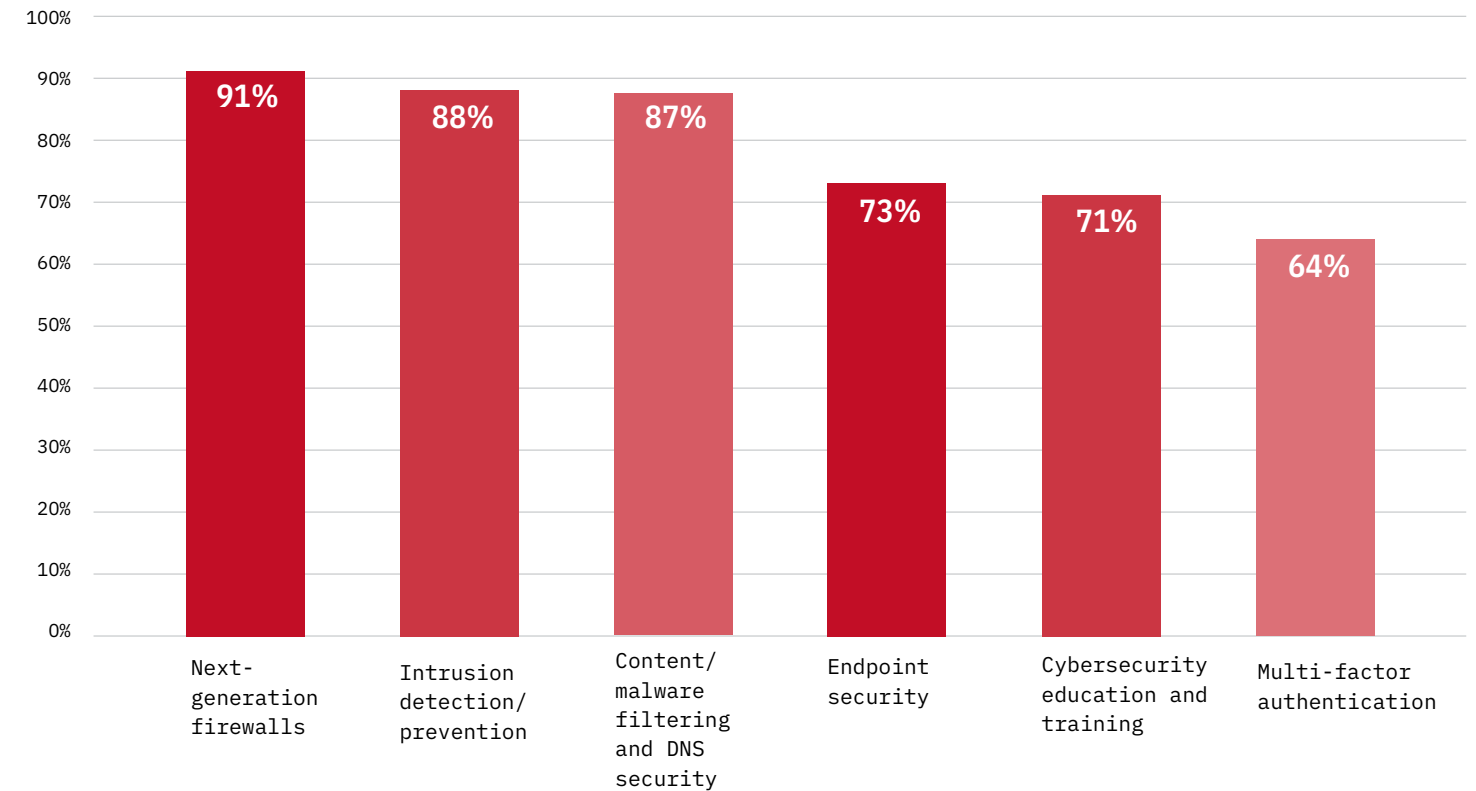
Streamlining the E-rate Program

Although survey respondents overwhelmingly agree that the E-rate program is vital to accomplishing their connectivity goals, many also suggest simplifying and improving efficiency in the program's application process. From enhancements to USAC's E-rate Productivity Center portal to changes in the program's eligible services framework, applicants advocate for changes necessary to ensure the continued success of the program.

"I am overall happy about the eRate experience I have had over 15 years. My only significant complaint is EPC - I don't think it is very intuitive to navigate."
– ILLINOIS SCHOOL DISTRICT

"Overall, I am satisfied with the ease of using the EPC portal and the eligible services to date. However, technology needs change quickly and the E-Rate program should be mindful of school and library needs for increasing eligible services."
– TENNESSEE LIBRARY

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

- 67% Extremely & very well
- 27% Somewhat well
- 6% Not so well or not at all well
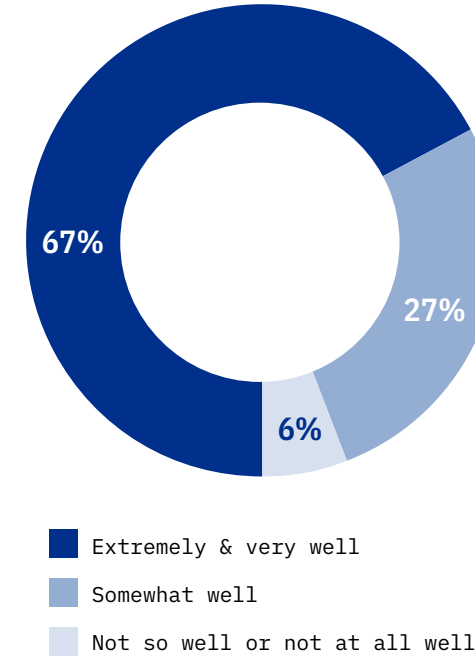
Overall, how satisfied or dissatisfied are you with USAC?
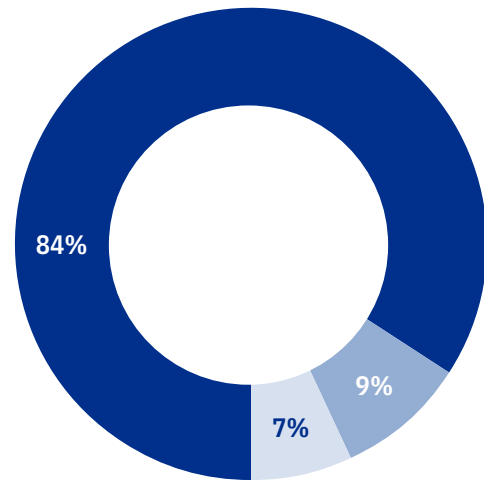
- 84% Somewhat satisfied & very satisfied
- 9% Neither satisfied nor dissatisfied
- 7% Somewhat dissatisfied & very dissatisfied

To what extent does USAC care about your individual situation?
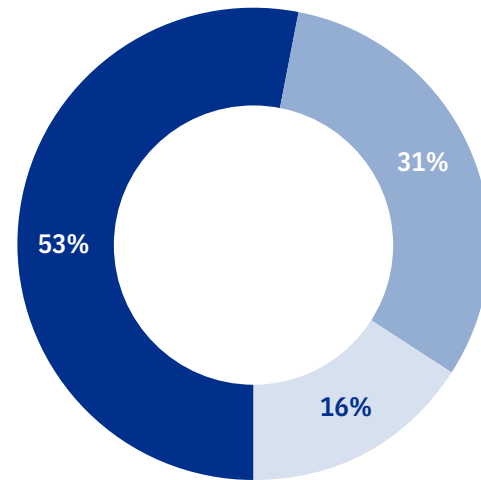
- 53% A great deal or a lot
- 31% A moderate amount
- 16% A little or not at all

How would you rate the EPC portal in terms of overall ease of use?
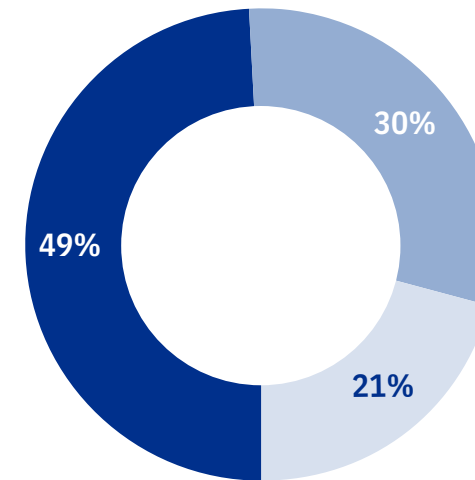
- 49% Easy or very easy
- 30% Neither easy nor difficult
- 21% Difficult or very difficult

> **"** I am new to E-rate, and the EPC help desk has been very, very helpful over this past year. I truly appreciate the time the help desk people spent talking to me to understand my problems, giving me information, and helping me fix the issues I was having. **"**
>
> – GEORGIA LIBRARY SYSTEM

Eligible Services

"Since we are required to implement internet filtering to prevent access to objectionable sites, content filtering services should be eligible. Some of the services are rather expensive."
– MARYLAND SCHOOL

"The eligible services list is very limited, I believe it should grow and evolve with our future technology needs."
– TEXAS APPLICANT

Which Services Should Qualify For Category 1 Discounts?

- Primary Internet Access *(currently eligible)*
- Self-provisioned network *(currently eligible)*
- Dual/spare/failover Internet
- Telephone service
- School bus Internet connectivity

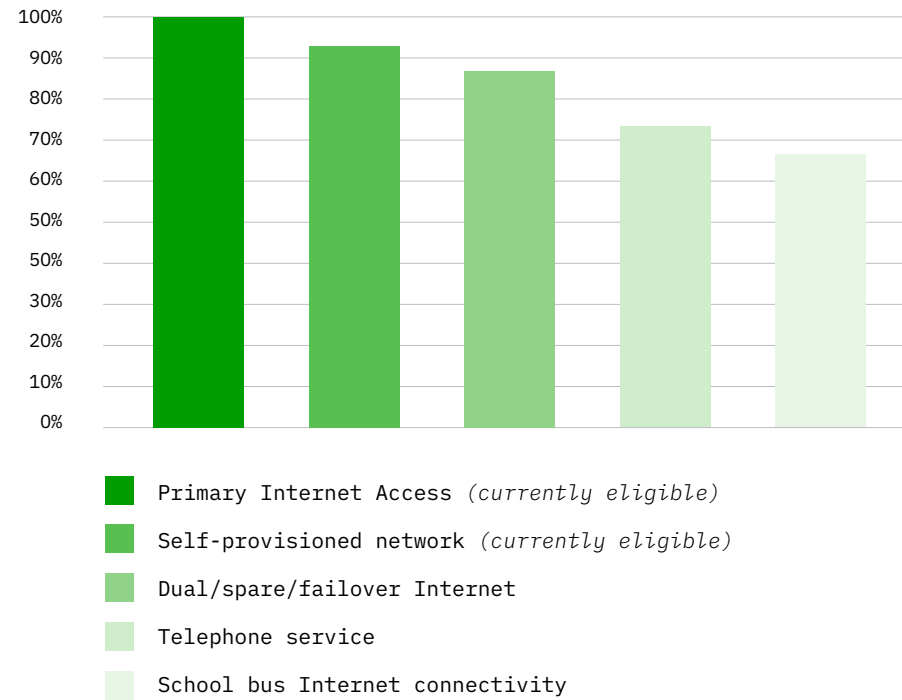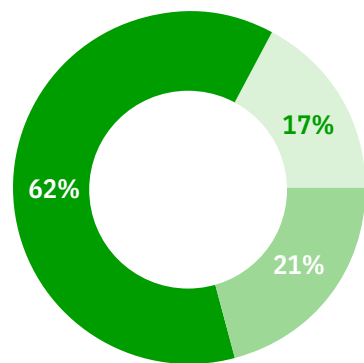## Do you have dual Internet connections (i.e. for load balancing, high availability Internet, etc)?

62% · 21% · 17%

- No, but we would if E-rate rules allowed it
- No, and we have no need for it
- Yes

Which Products Should Qualify For Category 2 Discounts?
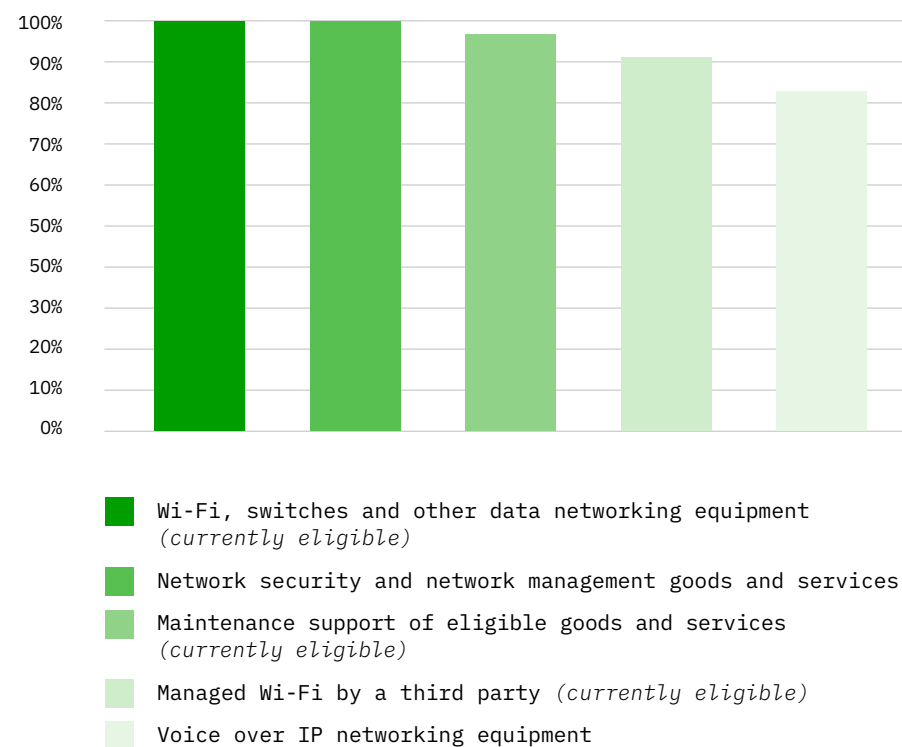
- Wi-Fi, switches and other data networking equipment *(currently eligible)*
- Network security and network management goods and services
- Maintenance support of eligible goods and services *(currently eligible)*
- Managed Wi-Fi by a third party *(currently eligible)*
- Voice over IP networking equipment

Equitable Access and the Learning Gap

"It would be wonderful to add wifi hot spots for off campus use to eligible services."
– MICHIGAN LIBRARY

"The most important issue we have in our rural area is that there is simply no service available to a large percentage of our students households in our community."
– MICHIGAN SCHOOL DISTRICT

The E-rate program would offer the most practical solution for our organization to access funding for off-campus Internet access and/or remote learning.

72% · 23% · 5%

- Agree & Strongly agree
- Neither agree nor disagree
- Disagree & Strongly disagree
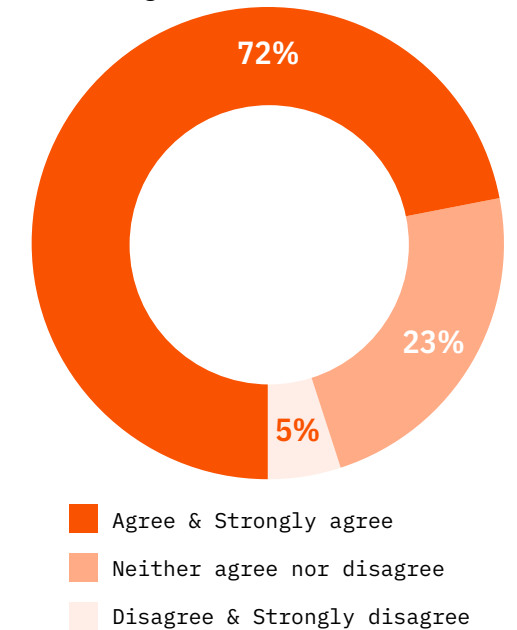
If the FCC permitted your organization to share Internet access off-campus, in your community, at no additional cost to the E-rate program, would you take advantage of this opportunity?

80% · 20%
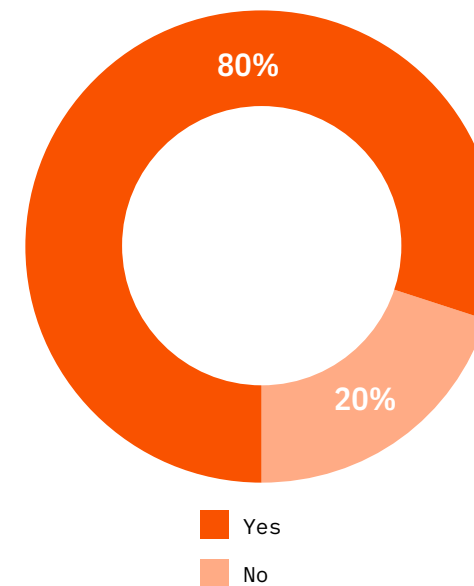
- Yes
- No

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

74% · 17% · 9%
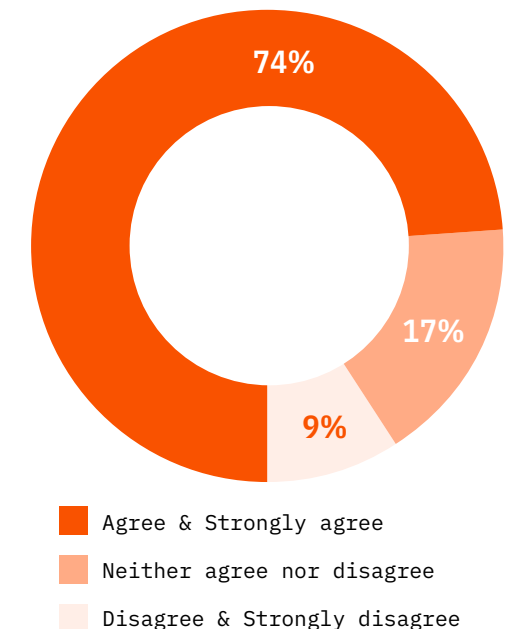
- Agree & Strongly agree
- Neither agree nor disagree
- Disagree & Strongly disagree

Forecasting the Future

"In addition to using ethernet for public access computers within the library, the E-rate program allows the Library System to provide free wifi 24 hours each day inside and extended to outside the buildings. Residents often sit outside the libraries to use the wifi when the libraries are not open to the public."
– PENNSYLVANIA LIBRARY SYSTEM

"The E-rate program is vital to our schools success as it brings stable high speed connectivity to our school district which services a small rural community."
– ARKANSAS SCHOOL DISTRICT

Having the option to purchase a Self-Provisioned (applicant owned) network has lowered our overall price per megabit.

- 96%
- 4%

■ Yes
■ No
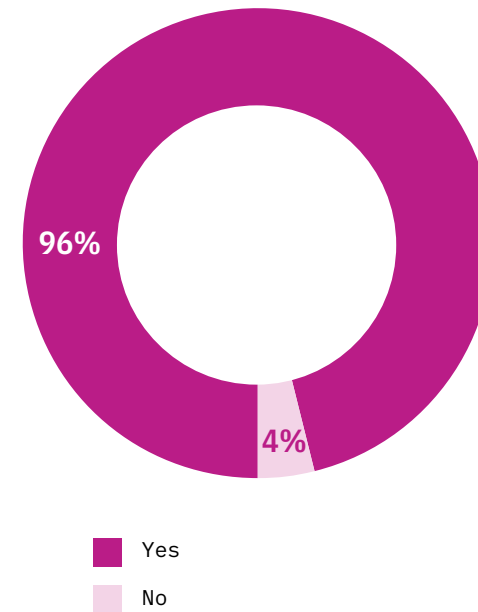
How important is Wi-Fi to fulfilling your organization's mission?

- 99%
- 1%

■ Extremely or very important
■ Somewhat important

How much do you expect your Internet bandwidth needs to change over the next 3 years?

| | No change | 25% increase | 50% increase | 75% increase | 100% increase | More than 100% increase |
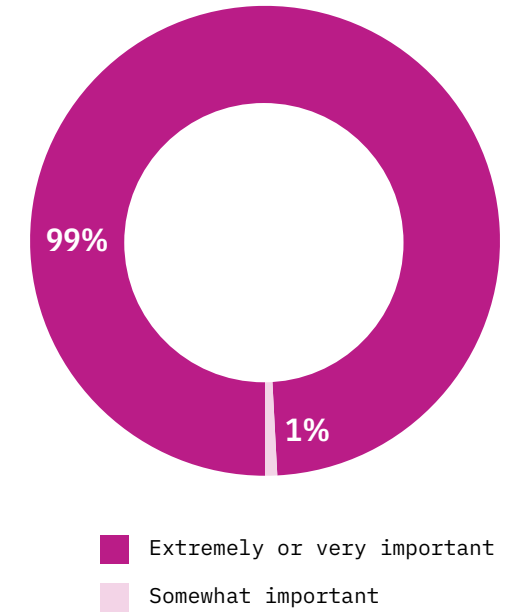
When will you need to upgrade your current Wi-Fi network?

- 54%
- 21%
- 19%
- 5%

■ 1-3 years ago
■ Within 1 year
■ 4-5 years ago
■ More than 5 years
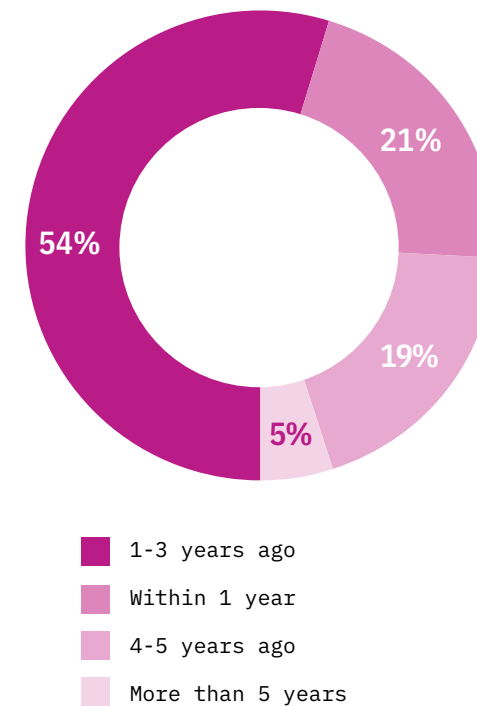
My organization intends to apply for Category Two discounts next year, in funding year 2023.

- 69%
- 22%
- 9%

■ Agree & strongly agree
■ Neither agree nor disagree
■ Disagree & strongly disagree
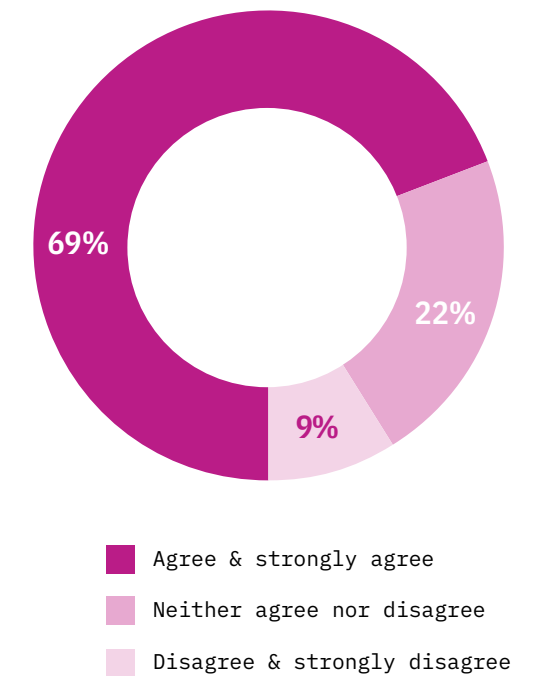
Survey Demographics

The 2023 E-rate Applicant Survey received 2,110 responses, corresponding to 10% of applicants participating in the program in Funding Year 2023. Responses were received from applicants in all 50 states and include a mixture of public and private entities in both urban and rural locations. 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 accurate picture available to understand the overall needs and experience of E-rate applicants as of the spring of 2023.

Survey Respondents – Private vs. Public

87%

13%

- Public
- Private
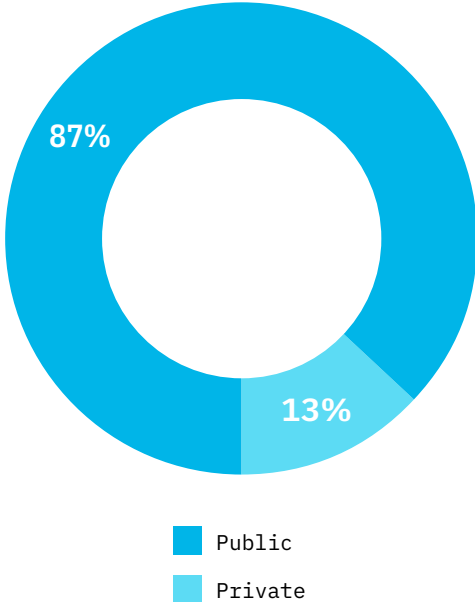
Survey Respondents – Urban vs. Rural

64%

36%

- Urban
- Rural
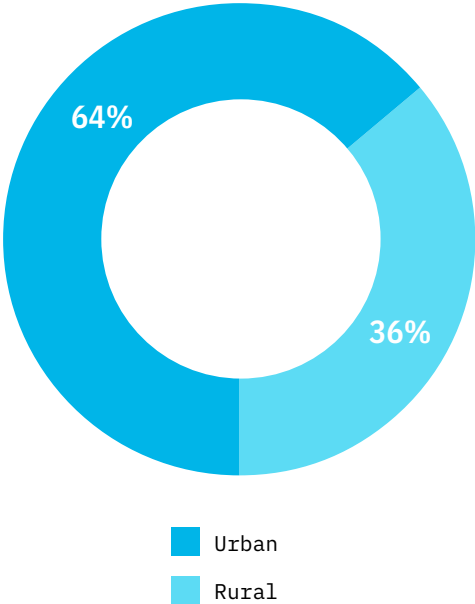
Survey Respondents – Applicant Type

60%

20%

17%

3%

- District
- Library
- School
- Consortium
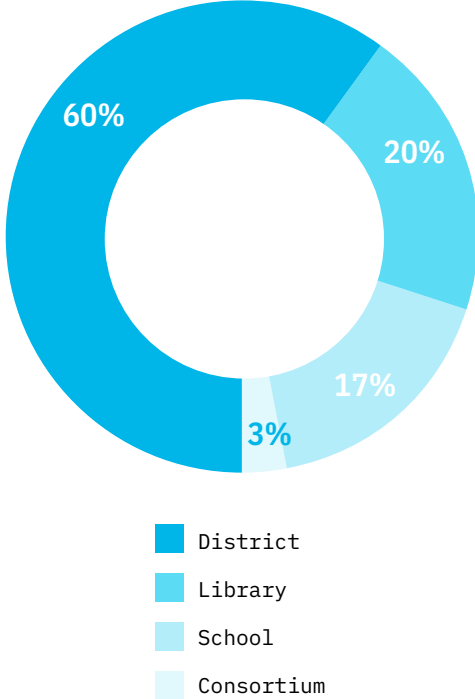
THE VOICES INCLUDED IN THIS report are highly valued. This section presents the open-ended comments from respondents, offering a firsthand look into the experiences, challenges, and sentiments surrounding the E-rate program. These comments, gathered from a diverse spectrum of schools and libraries, provide perspectives that go beyond numerical data, revealing the human side of the E-rate journey. Comments are presented as submitted, edited only to ensure anonymity for survey participants.

For readers who may be pressed for time, here are some key themes to consider:

- **POSITIVE IMPACT:** *The E-rate program is overwhelmingly recognized for its transformative effect, equipping institutions with faster internet connections and broadening connectivity horizons for students and patrons.*

- **PROCESS COMPLEXITIES:** *While the program's merits are evident, several respondents highlight challenges in navigating its processes—from application to reimbursement. There is a clear call for more transparency and efficiency.*

- **CYBERSECURITY CONCERNS***: In an era where digital security is paramount, many respondents emphasize the importance of cybersecurity, suggesting its inclusion and prioritization in the program's eligible services framework.*

- **BALANCING COST AND QUALITY:** *The competitive bidding process, although beneficial in cost savings, has raised discussions about striking a balance. Some respondents suggest more flexibility in provider selection to ensure both cost-effectiveness and quality service.*

- **DIVERSE EXPERIENCES:** *From commendations to constructive critiques, the comments reflect a spectrum of experiences. They underscore the program's extensive reach and the varied needs and challenges of its participants.*

While these insights offer a snapshot, we encourage readers to peruse the comments when possible. They serve as a testament to the program's impact and the continuous dialogue about its refinement.

2023 Open-Ended Responses

1. Train the reviewers to look at all documents submitted. Two years in a row I've had to file an appeal because the reviewer didn't look at all the documents submitted.

2. Cyber security is Essential!

3. Trying to get a BMIC reimbursement paid out is painful and extremely slow. Each invoice is audited by USAC. Why can't they have an option to upload the invoices when you do a BEAR to hopefully cut the time down between when you submit the BEAR and when the reviewer audits the invoice? It shouldn't take 6-12 months or more for these to get paid out if they're eligible for E-rate. Second, why is it also so hard to prove to USAC that a school owns their fiber between buildings when they apply for fiber maintenance? A lot of these schools installed the fiber back in the '90's. If they have a current fiber maintenance bill, why doesn't this suffice to prove they own their fiber?

4. Give applicant more authorization to select providers without using cost as the main factor for selection.

5. E-rate is a good service, however it is more focused on rigid compliance to ever-changing rules than on actually helping students. When a district can have a request denied based on rule changes that were put in place after the bid process was completed shows that they are not focused on student's needs.

6. Decrease time for RFCDL and Form 500 changes. ECF speed for RFCDL has been very slow for minor change requests. Same for changes in EPC for E-Rate...it has been very slow. Reviews need to be improved for speed and transparency so we know where the review is. The lack of visual steps within the review process could be improved fairly easily. There are multiple levels of review and commitment....having a way to see where it is would be welcome.

7. Expand the ESL, but not to the degree suggested by most advocacy groups. Stay focused and clear on what are key services and devices to support the core duty of the FCC's E-rate program

8. There are to many forms for a process that could be so simple, especially for tier 2. You can buy this, but not this. The list of things you can is great, but the list of thinks schools need help with are not covered (domain servers,etc). Why not make tier 2 easy. Calculate how much a school get for every 5 years and send a check to the school for that amount. It can be used for anything tech related needs the school may have. And for reporting, all POs, purchases, invoices, etc must be uploaded to the system to insure money is being used correctly. This school needs are met, incase southside school has different needs than Northside.

9. Thank you for providing school districts with funding every year.

10. Cyber Security threats are outpacing our access to current protection platforms. Policy dictating Security platforms(both cloud hosted and on premise) for network and email security need to updated to reflect our current IoT environments.

11. I believe E-rate should help with Web Filtering.

12. I wish the review process was more transparent and faster. Also, we get the same PIA questions every year. it would be nice to be able to "pre-upload" documentation that the PIA reviewer could see so that a PIA question wouldn't hold up the proccess

13. The E-Rate program should cover IP Phone System solutions including the IP phones.

14. All cyber security analysis, cyber user training exercises and the equipment and services to protect all aspects of the school's Internet from ransomware attacks, foreign intrusion which we see daily as an individual school. The School Districts must be battling worse. The Public school district we are located in spent $10 Million recovering from a ransomware attack. An individual school doesn't have those funds. Imagine all the teachers raises that didn't happen in that County because of rebuilding a more secure network.

15. We desperately need erate funding to support purchasing Cybersecurity products, equipment, and professional services. It is one of the biggest threat to students and staff, but costs are so great that most systems cannot afford what they need.

16. Discount programs for one-to-one devices (chromebooks, laptops)

17. E-rate reviewers are difficult to understand and often do not know anything about the needs of schools. Reviewers often do not speak English very well and when you ask questions they have to get back to you.

18. Wish someone would actually participate in the whole application process to see how horrible it is to navigate!!!!

19. Cybersecurity and expanded broadband are our two most important suggestions.

20. EPC requires MFA. Insurance and banking require MFA. Having experienced a Ransom ware attack, increased emphasis on network security should be a priority.

21. My main issue is with PIA. It is very hard to get information from them. When they calculate payments they do not explain how they calculated the amounts when they are making partial payments. They need to do better when responding to customers

22. I am happy that we can participate in E-rate, but the USAC site isn't intuitive. While the goal of Erate is to provide Internet access to students and patrons, it has a very narrow scope. It limits the services

It is a lot cheaper to pay to protect than recover! The ERate funds can be used to protect in a state of the art manner and avoid school being closed like it was in the Public schools here. The online forms to process Federal Title I,II and IV Part A are still not fully functional. We are using forms emailed to us. That attack happened more than 2 years ago. Lack of funding causes lack of attention to cyber safe operations resulting in incidents that cost MORE in time and money.

23. The E-rate has great intentions and provides a great resource to our schools. The EPC system is improving but still remains cumbersome and not very intuitive. The eligible services list is very limited, I believe it should grow and evolve with our future technology needs.

I can create for patrons to use the Internet/wifi and computers. Security and functionality are necessary to maintain a network so more items should qualify to allow for the new hardware and software that IT must provide.

24. With the increase in cyber crime, K12 organizations need additional support to protect our networks and our users.

25. It would be much more user-friendly if you could move forward in the forms without filling out all the fields - so I could see what questions I don't know the answers to and could look them up all at once. As it is now, I see a question I don't know, then have to look it up and/or call E-rate, then proceed to the next question, look it up and/or call E-rate, etc. Very tedious!

26. EPC needs a revamp. It can be confusing to use to file 471s because different tasks need to be performed in different places then pulled into the 471.

27. Overall, great job! We have benefited greatly by E-Rate funding. It is just a pain figuring out the process sometimes. Difficult to know what is eligible and what is not. Example, infrastructure (network cabling, switches, etc) is and servers (the thing the network switches and cable support) is not. . . But, it is an overall good deal for the school districts, particularly rural districts.

28. EPC is still difficult to move through with ease for both the 470 and 471

forms. Help is not available while preparing a form, and simple Step 1, Step 2, Step 3 on pages would help to simplify the process. Direct links to sections of the forms would also be helpful vs. having to click the "back" button MULTIPLE times to return to a specific section. Overall, the forms have improved, but again, simple instructions at the head of each page would be of help to the end user. Also, on the Erate site, "How to" videos for EPC are very difficult to locate. New users to the system would benefit greatly if those videos were accessible in EPC for all matters related to the portal, such as managing the organization, how to complete the forms, etc.

29. The only reason our school can even come close to keeping up with our internet needs is because of E-rate. I think adding VOIP to eligible services would help a great deal since many schools have switched to VOIP. I agree wholeheartedly that security appliances and services should be covered by E-rate. What good is keeping up with high-speed access if we cannot also keep it safe. Also cybersecurity training for school tech coordinators would help as well.

30. This program is vital to the overall success of our district. Erate allows us to keep our equipment up to date and our students safe.

31. This was my first time in years to apply for erate. I found the portal fairly easy to navigate. I did have some questions I needed help and was able to get it from the portal site.

32. Cameras are no longer optional for school districts to have. Therefore Camera networks are now a must. We should be able to utilize Erate for both phone systems and security items such as Camera/access control.

33. I'm thankful for our erate funds. It allows us to stay current. There are many more "things" coming at schools though, like cybersecurity training and preparations to prevent hacks. Another area of deep concern is inequity in students' internet at home. Access to rural internet is sparse in some areas of Arkansas. Those students matter.

34. The rules are always changing. We had to hirte a consulted to help with filing

35. It would be dicult for our school to survive without e-rate

36. PIA Reviewer during the filing window were too time consuming in order to get everything filed correctly.

37. The EPC has made the E-rate process so much simpler, BUT it needs some modifications. The location of some of the items makes zero sense. Some forms are in one place, but you have to go somewhere else for other ones. Either it needs a search function, or better menus to help you find what you need.

38. Have better ways to contact you for questions and help. Make filing easier with fewer forms.

39. Keep up the good work!

40. We have worked with this program for years and have always been very pleased with the outcome.

41. We would love for all of our students to have internet access at home, but there is no way we can be the "troubleshooters" for this service if it were provided in our community without funding to pay additional staff.

42. Erate is and has been a major help for our small school district. I just upgraded my Wireless system this year with erate funding.

43. Self Provisioned fiber projects should be easier to justify.

44   EPC Portal should have easier access. Currently I am required to change password each time I log in and verify it is me. Descriptions should be clear on what is considered to be covered and should not have to jump through paperwork to make sure we get the equipment needed.

45   Would like to see a more detailed eligible services list or database… We have noticed inconsistencies with some services being approved for other schools even though we've been told those same services are not eligible. This causes us to question whether these services are truly eligible, or if some other school somehow "slipped through."

46   I believe that Cyber Security products (ie EDR) should absolutely be on the list. Very expensive product that are very necessary.

47   The 470 / 471 requirements seem too picky. It is troubling to find when one files a 471 that something different should have been specified on the 470. These issues usually involve category 2 items that might not be well defined until after proposals are received, which is far too late to modify at 470 listing. It seems like this could be improved to not exclude viable solutions just because of a technical issue with the 470.

48   Forms are difficult to navigate, forms have way too, too many pages, should be consolidated; bring back the Ombudsman/jwoman - there is no place to go when there are serious issues with the program and personnel. Personnel need more training, something as simple as understanding what's an LOA.

49   State Level Linux OS support for school techs and network administrators. We currently only have support for Windows OS.

50   In the EPC at times I get lost and find it hard to navigate, it seems there should be a more streamlined interface.

51   Please bring back phones as an eligible service. There is no data that I have found that supports wifi on buses as being of instructional value. I would rather funding be allocated to items that matter.

52   The application process, even with the help I receive from our consulting firm, is very difficult. Without them, I wouldn't be able to do it at all.

53   The program must fund more security services than basic firewalls. On some basis school rely so heavily on internet connected learning tools that a loss of internet connectivity almost stops learning. There needs to be a way of funding a diverse provisioned internet circuit is needed.

54   The EPC user experience for a consortia applicant and large school districts or large library systems is much more challenging, time consuming and clumsy than for smaller applicants (with 10 or less entities).

55   We have a person who works for our libraries who helps us through the application process, if not we might not navigate through the new USAC site......it is not very user friendly with having to reset password, etc.

56   The application process is too complicated and beaurocratic. I'm afraid organizations/entities with larger support staff get priority over the smaller, conservative entities.

57   The most recent FY bid process, most vendors did not submit information as they have in the past. This year I had to seek out vendors for the bids. Curious if the vendor process has become more difficult?

58   Can't search on entities in EPC, PQA told me they will audit me for a county that is not in my state and counties are not eligible, PIA and PQA does not know the basics.

59   Question the seemingly irrational denial of funding for certain 'unbundled' services like firewalls. I.e., if we itemize costs, they become ineligible. Reasoning?

60   Improve USAC processes; Have USAC improve EPC; Include Cybersecurity options in E-rate CAT reimbursements; Provide school divisions with contractor services funding/contracts for USAC/EPC processes (470, 471, BEAR, CAT1 and 2 processes/reviews/audits, …)

61   E-Rate has been crucial in helping our schools access higher speed internet at an affordable rate. Thank you.

62   Cybersecurity should be the number one item to add to eligible services.

63   I am so grateful for the E-Rate program. We could not function without it. I also really appreciate that ECF was provisioned using the E-Rate protocols.

64   Basic maintenance takes far to long to approve when submitting for reimbursement. It is very frustrating that it is committed but then is picked apart and funding is decreased when it is time to pay out. Also, fully fund firewalls. That would make things so much easier. They have to filter so don't punish entities by not fully funding them.

65   Please consider including cybersecurity, schools are facing an uphill battle and your support would be invaluable.

66   It should not be so difficult to apply that schools need outside help to complete their applications.

67   EPC was a disaster, and the PIA personnel need more training.

68   Our Library needs the E-rate program in order to afford the cost of quick internet. I do worry that the Library may not always be awarded the funds to pay for quick internet.

69   FCC/USAC definitely does not need to put the CAT2 bidding portal in EPC. Districts have a hard enough process dealing with state laws. This would add a layer of complexity that may prevent us from applying for any CAT 2 equipment.

70   I have managed the erate application process for the library for almost twenty years. We have moved in that time from faxes and paper applications to the online portal. The process has improved, but there is still room for improvement. The navigation of the portal is not intuitive, and it is often difficult to go directly to where you need to go. As we move toward greater dependence on the portal it would make sense to invest in making it easier to use. The Library also applied for and received funding through the Emergency Connectivity Fund (ECF), which is also administered by USAC. Though we are grateful for the funding we have received through that program, the actual management of that program has been a nightmare. We are still attempting to recover the final $1,000 that the library paid up front with local funds in November 2021 for data services acquired as part of a package deal with hotspots purchased under this program. In dealing with the ECF all communication is routed through the EPC to reviewers and there is a definite disconnect there. There is no means for applicants to speak to a reviewer directly. You can call USAC for assistance, but the operators have no real way to offer any direct assistance. It has created incredible stress and real financial hardship for the library. This is unfortunate because the program had great potential and it did allow for definite growth in the library's ability to provide internet connected devices and high speed internet to our patrons. It's too bad that had to come with the administrative nightmares that it did. The assistance that USAC provides applicants under the regular e-rate program is by contrast markedly superior. When I call USAC with questions or problems with erate they are responsive and helpful and have always assisted me with working through any issues. It is very important that when we call for

help the people we talk to have the ability and power to resolve the issue. That in my opinion was the biggest downfall of the management for the ECF program. Our library serves two rural counties and provides library service to almost 30,000 residents. The availability of high speed internet connectivity across the service area is varied and in places difficult to obtain at any cost. Without the support of the federal erate program we would not be able to provide the critical computer and internet services that our patrons at times desperately need. It would make sense as this need grows for the erate program to also grow so that we can continue to respond to and obtain the technological innovations that would benefit our constituents. We are already underfunded and understaffed. Without the federal erate program we would be completely unable to obtain the critical internet and technology required to support the information needs of our patrons who depend on and demand these services.

71   I'm a small district with limited personnel. The E-rate usac program is so difficult. Just make it easier. Let me fill out one form and be done. It's so frustrating, and it turns out that if I hadn't signed an e-rate contract I could have gotten internet to our school cheaper without erate. We won't be using it after this next contract. The bidding process actually creates higher prices than just calling local internet providers.

72   Get rid of the no NIF rule. NIFs still house gear that affect schools and students. Yes, there are gray ways around it, but it should be done away with altogether.

73   Thank you for allowing Head Start Programs to utilize this funding.

74   USAC has made many mistakes and costly delays approving our 471 over the last couple of years, also a SPIN change was done incorrectly, still working to fix

75   Cyber security is a large threat for schools and libraries. If E-rate helps provide the connectivity, then it should also assist with the cyber security since these are very large costs for schools and libraries to afford.

76   PIA reviewers don't read the valid file.

77   Overall, I believe that the E-rate program has been successful in achieving its goal to provide high speed broadband access to schools and libraries. The modernization including Category 2 reform has allowed eligible entities to purchase the equipment necessary to support and maintain a robust WiFi network. During the past decade, it has been made clear that schools and libraries require enterprise level equipment and infrastructure, but are restricted by K-12 budget limitations. E-rate has been successful in helping to bridge that gap, allowing entities to purchase the needed hardware and software. It is time to include network security products and services as eligible under E-rate. The strong push for this during the past year was long overdue. For years, E-rate funded firewalls, but did not fund network security. Next gen firewall, Multi-Factor Authentication, DDoS mitigation and other network security services are no longer optional. They are a necessity. Throughout the last two decades the E-rate program has been modernized and updated to reflect the current environment. I sincerely hope that the FCC and USAC revise the eligible services list for future E-rate funding cycles to include network security products and services.

78   I'm grateful for the funding that E-Rate provides so that we can better meet the needs of our patrons and community members.

79   I appreciate E-rate, but as a solo librarian I am never positive that I'm filling out the forms correctly. We definitely would not be able to afford our 100x100 internet if not for E-rate grants, so thank you!

80   More preventative cybersecurity services.

81   The application and funding process is kludgy at best. Even when we hired a consultant, a technicality of the date product was ordered resulted in lost funding. Haven't tried to get funding since then. This shouldn't be that hard, but the process and rules are cumbersome.

82   This program has been important to our School district. I am frustrated at times working in the USAC site. Overall the program supports our students and helps provide equitable internet access. I am very please with the program

83   Security cameras should be Eratable.

84   I have needed to contact USAC customer service a few times this filing season and have had a wonderful experience. My call was answered quickly, I could speak to a human and my customer service agents were helpful and knowledgeable. I detest EPC, it isn't at all intuitive to use, it's confusing and for things you need to use regularly, like uploading contracts, the locations and instructions are hard to find. Surely, this can be a simpler process. Things were much easier before portal!.

85   Content/Web filtering and network security should be included in the Erate eligible services because they are imperative to help keep kids safe

86   PIA is horrible. Reviewers have insufficient knowledge of Erate rules and eligible products and services. They are frequently wrong in their analysis of the application services or products and will repeat the same reviews multiple times with different reviewers. The NSLP data request canned template asks ridiculous and unnecessary questions even after official documentation is provided. PIA is the worst part of the process.

87   Overall the program is great. However, the timelines need to be changed. By the time funding is approved most projects can't get started until the fall. The summer is the time we need to be able to do the work so there is no interruptions of class time.

88   USAC needs to work on their UI for the EPC and its general usage. UI design is incredibly important and the website is just lacking. Also as a previous cybersecurity compliance agent for another organization, the need to expand to cyber and network security is immense.

89   Cypersecurity and VOIP are important to us and I would like E-rate to take this on.

90   I agree that E-rate is a great thing for school systems but there is still a long way to go to make sure that both the erate system and schools are not getting the raw end of funding deals. This cycle my predecessor gave our hardware a much needed refresh but didnt leave enough in the erate budget for licensing. I have been fighting a vendor over their poor licensing practices for the past few years and it has been a rough go, at this point there is no budget to get the capability to have better bandwidth that we need. Vendors also take HEAVY advantage of us, after talking to our rep (stressing that this is the sales rep, not the bidders) earlier this year about the issues we were having he swore that the price he was going to quote the vendors that inquired was going to be low, our bids were 50% higher than the rep said they should be. It's a broken system that will not get any better until there is a cap on prices that venders are allowed to upsell on, bidding helps but using vendors itself is a broken process that allows too many handshake deals and no transparency in prices.

91   Phones services (VOIP) would be extremely helpful.

92   As someone who has filed E-Rate for more than 20 years, the EPS process I much better than it was 10 years ago. The interface still has some quirks. Even as someone who does this process every year, there are steps that don't make sense - like adding contracts for a 471 - you should be able to do this with the navigation for the form 471 instead of needing to manage the organization to add them. The system could really use a "home" button that takes you back to the landing page, and which is shown on every page. The USAC logo does this in some cases, but it's not intuitive why it works in some places but not others. I spend far less time using the system now than I did a few years ago, it is working much better and performs better. I'm very grateful for the investments made to simplify the process and improve things. The tutorial videos are VERY helpful, and even for forms I do each year, I will re-watch them to make sure I don't skip a step or get stuck.

93   Our data centers are not considered directly part of any school (NIF), but it would be good to have CAT2 funding eligible for these sites for equipment, especially since CAT2 funding is now aggregated at the district level. This would lead to more flexible internet circuits designs to consider.

95   This program has been vital to the ability of our District to provide an exceptional network to our schools. Thanks for all your hard work.

125 E-Rate filing is a frightening and cumbersome process. If not for our state contact this would be near impossible.

126 The application process is fairly simple if you get everything correct the first time through. It's tricky to figure out where to click to get back to an application or to submit corrections if you need to revisit an application.

127 The system can be a pain to work with. Needs to be a better way of asking for funds.

128 A bidding portal would make the E-Rate service to complicated and make it difficult to get accurate bids due to robot bidders and vendors not understanding the submitted RFP's.

129 It would be nice to see MXDR supported by Erate and allow area education agencies access to category 2 funding again. Thank you.

130 It has been a challenge to work across various government programs to prove we are who we say we are in order to get reimbursement for ECF approved purchases. We receive payment from E-rate but not from ECF. Can these programs not share information with each other?

131 I need E-rate to cover wi-fi access for our hotspots. We got that during Covid and the cost is going to be prohibitive going forward. We have many rural students who don't have home internet and make use of this service.

132 The application and audit process is a nightmare.

133 With smaller schools having 1 person to control all of the technology needs we have had to hire a third party person to keep up with all of the filing and changes that happen with Erate. I wish that was Erate eligible just like a third-party network service maintenance plan is. I also feel that if the Erate program was open to other things it would help us maintain our network and services better. We are using an obsolete phone system because we have chosen to update other things instead. E-rate is essential to the work we do at school though. It is not broken.

Thank you for your continued support of schools and libraries.

135 The need for cybersecurity help is vital!

136 I would love to see an option of antivirus/malware software as an option on e-rate. Also, more help with firewall protection services. Thank you!

137 Our school is thankful for all the support you have given. Thank you

138 Thank you for this opportunity to participate in your survey. The most important issue we have in our rural area is that there is simply no service available to a a large percentage of our students households in our community. There are areas that have no Cellular service, fiber, or any other option to provide a reasonable amount of bandwidth to our students. I understand it is difficult to build infrastructure in rural areas as the return on investment is so low. New 5G technologies appear to decrease the cellular range, and as a result, increase the number of households that do not have access to high speed internet. Thank you again for this opportunity.

139 Make an application page simple-

140 I think the program is great overall. Sometimes I do think the PEI reviewers are a little picky.

141 We use an E-Rate consultant to manage our program due to the complexities of the paperwork. It would be nice to have a portion of that cost E-rate eligible.

142 Training videos/documents should be more detailed as in step-by-step.

143 Thank you

144 The most important and severe need right now is cyber security. This is what tech directors like myself are consumed with right now because schools are so underfunded and ill-prepared for a cyber incident.

145 WE NEED CYBERSECURITY FUNDING!!!!!

146 I think to many things are being "rented" as a service when the price for purchasing is much less in the long run, E-rate shouldn't pay for "renting" maybe paying prices for management or something should be considered, the equipment prices are much less in the long run if just purchased. I believe this is how some suppliers find their way into getting the government payouts from E-Rate. I rarely have to manage my own wifi or other devices, and as a service it has always been much higher to compare.

147 USAC should aim to fund additional services not currently covered but are imperative to the modernization of Schools and Libraries: 1- Emergency Mass Notification services, Safety, Cybersecurity, Security Devices, Intercoms, Campus Security, Emergency Networks/Radios, & Communications, etc 2- Construction Costs associated with the modernization of buildings & networks. 3- Administrative Costs associated with EPC & USAC application process, legal fees etc. 4- Maintenance & Repair of networks and equipment to provide High-Speed Internet. 5- VPN, SD-WAN, and temporary networks are often times needed throughout the school cycle. 6- Email hosting, Website costs, and Internet costs outside of the school networks associated with School work. 7- End-user devices

148 I believe schools located on Indian reservations should be able to select a internet provider other than what the tribe offers. The service is a lot more expensive and less reliable.

149 I did not know the answer to some of the questions, so I left them blank.

150 I believe E-rate should not use the National School Lunch Program as the matrix to determine the discount level

schools receive. It should come out with it's own matrix, perhaps basing it on the median income of the zip code in which the school is located.

151 I appreciate your support.

152 I have been doing this for 15 years and EPC makes things so much easier. I am also very grateful that the reimbursements are not coming from USAC instead of waiting on the vendors.

153 Schools are now a top target for cybercriminals. The lack of E-Rate funding for next-gen firewalls and related internet security is shocking, and antithetical to guidance from CISA and the FBI.

154 We rely on the e-rate program to provide us with affordable internet bandwidth. We would like the e-rate program to be expand to cover the cyber security tools we need to protect us from a cyber attack. The State Erate Rep has done a great job keeping us up to date on the program. Having that person to help train us and support us is much appreciated.

155 Intrusion testing part of Erate funding.

156 the USAC website has been getting better, but it has a long way to go. Also, the face that we need to hire a consultant to handle our ERATE is a symptom of the process being too complicated. These consultants take a huge portion of the money and shouldn't be needed at all. Cyber security needs to be covered. We cannot afford it otherwise. Also, features like High Availability need to be covered as well. Lastly, the people you have working for you need to be trained better. The system is even confusing for them and this confusion ends of having them denying stuff. When we appeal and get another agent, it magically gets approved. It should be consistent, not a random draw of who you get.

157 I feel that any internet services that can be provideed should be eligible.

158 As a new E-rate user, I feel that the USAC website is not user friendly and

navigation is difficult. I absolutely appreciate our outstanding E-rate Coordinator, who provides step-by-step guides and helps to answer our questions.

159 The EPC has improved over the past few years. The process for bidding and requesting funds is still cumbersome, and the requirements are sometimes unclear. The E-rate program overall does benefit our communities.

160 All services, such as Filtering, that are required to get E-rate reimbursement should be covered for an E-rate discount.

161 Application/reporting and timelines require a person to manage the process.

162 The EPC/USAC websites and application process for E-Rate is not user friendly or easy to understand.

163 This is a great service to public schools. If we did not have E-rate we would not be able to provide the services we currently do to students.

164 As a service agency, we do not have a Cat-2 budget but we have the same needs as K-12 public schools. Have Cat-2 to help with our wireless would be extremely beneficial.

165 Whenever I have to call or work with USAC customer support, they are the best. Always working with fantastic folks there. Thank you!

166 The ability to purchase and maintain cybersecurity equipment and products is a financial burden on our district. ERate funding would be a significant help in being able to provide up to date cybersecurity resources. In addition,

the 5 year Category 2 cycle is a struggle with needing to update both network infrastructure and WiFi network and keep it up to date. At this time, we barely qualify for the funding to do network infrastructure one 5-year cycle then WiFi the next 5 year cycle. By the time the cycle comes back around, our current equipment is past end-of-life.

167 E-Rate program helped our school so much. Thank you!

168 Like procurement processes everywhere, there should be a dollar threshold where a bidding process is not required. The bid process for small rural libraries is onerous and pointless. If the overall cost of services is less that say $30K or even 50K, just allow entities to select a local ISP.

169 Cyber security is a MUST. Please advocate for this.

170 Excellent Internet Funds Service I hope you continue to increase this help for students and users

171 The pandemic has forced many districts to adopt advanced technology to support instruction. Districts are now looking to fund these resources so they can be sustained and continue to provide learning opportunities where they once did not exist. It would be great if districts could leverage E-Rate to support the procurement of laptop fleet.

172 Erate really needs to more thoughtfully consider the situation of rural schools and libraries when forcing us to go through a competitive bidding process. We may only have one company in our area to provide us with these services, but yet we are still forced to go through that competitive bidding song and dance. It's a waste of time and effort.

173 I am very appreciative of the program. I believe it greatly helps K12 schools offset costs. It would be nice if the program expanded what it covered, but I am still greatful for the assistance it does provide.

174 Please allow virtual schools to apply for C2 funding. Though our students attend school from home, we still have staff and services in school offices working to facilitate their education. Please print the Quarterly Disbursement Reports on 8 1/2 x 11 paper again to make it easier to file in our E-rate binders.

175 E-rate is vital to public libraries like mine.

176 USAC used to provide in-person training for state coordinators. They have stopped doing this. A lack of in-person, dedicated training for state coordinators makes the program less accessible for those in states without long-serving coordinators (5+ years of experience), which is at least 1/3 of all states in a recent survey of state coordinators.

177 Needed and appreciated.

178 Cybersecurity is changing how we operate on a day-to-day basis. Any help you could give us would be much appreciated. Thanks

179 We had a recent issue with our eRate service being unduly influenced by a "free resource" our fiduciary (business consultant) introduced us to who turned out to be an illegal representative of one of the telecom companies bidding for our contract. As a result of this interaction, we are expecting our current eRate contract to be voided. While we will personally never make this mistake again, it would have been nice to have some kind of warning or support for dealing with the situation. As a small school with no full time IT staff, it has been a very challenging experience.

181 When EPC began, there were a lot of bugs that never got worked out and schools/libraries lost their funding. Some applicants got their extensions in while others were booted out of the system. USAC said all funding would be approved but that was not true. We have opted not to do E-rates due to this huge error and waste of our precious time.

182 Please allow cybersecurity products and secondary connections.

183 Next-gen firewall and cybersecurity has been a big ticket item for many organizations like ours. Bad actors are not only after the Fortune 500 companies, they are targeting K-12 entities as well. We definitely need help with funding in these area. We do not have the budget to buy these product and services to defend ourselves from these bad actors. Ultimately, we want to keep our students safe and provide them the connections needed so that they can learn and thrive.

184 USAC is losing it's focus on delivering it's services. Quite frankly the last couple years have become increasingly frustrating with getting approvals in a timely manner as well as working with reviewers who have no technical skills or knowledge about what they are approving. The PIA agency is evolving to be on par with the IRS' tactics as well. It took 8 months to complete a review, it continued until they found something they could establish as a finding/error. It was a questionable procedural gaffe, one where if I had the money personally I would have sued the agency...and won. there was no misuse of funds, no embezzlement/scam, money

funneling occuring. For this we had to pay back the refund. I'm sure this will be seen as sour grapes. However, this is coming from someone who has been filing/responding for 20+ years, the companies contracted by USAC have been in a decline over the last 5-6 years. I am seriously considering talking to my congressman to air some complaints! Again this agency should be here to help, and yes, ensure the funds are being appropriately spent, however having witch hunts for procedural issues is flat out an intimidation tactic being used, much like the IRS, in my opinon!

185 The library benefits greatly in E-rate subsidizing costs of internet services.

186 Since E-rate is supported by a local tax, all of the money collected should come back to the local entities and should be used as those entities see fit.

187 I just want to say thank you for the opportunity that you have given my county to be able to afford good internet and equipment. I could not do it without your program.

188 I feel that security cameras, facial recognition, object detention, and other security technology to make the school environment safe needs to be considered as well.

189 It is extremely helpful to have a dedicated erate consultant/account rep to assist with year-to-year responsibilities and requirements. Meeting on a recurring basis keeps everything smooth and steady.

190 We sincerely appreciate the E-rate program and how it enables us to offer our students a quality education.

180 Cybersecurity systems are a critical component to ensuring the reliability and security of our infrastructure. However, they are very costly and add a significant burden to our yearly budget. Being able to use E-rate funds for these systems/services would help reduce this burden and allow us to ensure we are using everything necessary to secure our network.

191 Education is quickly becoming a large target for hackers because they know we are a fantastic target. Most people in our role know nothing about network security as they are educators. Education strongly lacks the funding and training to keep our districts safe. We strongly support the endeavor of the FCC and USAC to offer support where network security is concerned.

192 We have all but eliminated filing for eRate. We can't always guarantee what our portion of funding will be. For internet we worked with a local collaborative to get fully redundant internet for about 60% of what we were paying which equates to around the same discount level we saw with erate. Under erate we had multiple 10 gig connections, of which only was eligible. Now we have multiple 100 gig connections and will be set for the foreseeable future. If erate was structured more like ECF, it would be more useful. Let me apply for 100% of funding on a project by project basis. If approved, it gets paid directly, or if I already funded said project, reimburse my entity for it. I do think cybersecurity products being covered is a good idea as well. But once again, the whole percentages game along with having to guarantee our portion of the funds can be problematic. School budgets can be influenced by external decisions at the state level, and encumbering funds almost a year in advance doesn't always work well.

193 The E-rate program is crucial for our district as it provides funds to ensure that our students have access to modern telecommunication and information services at affordable prices. If we didn't have this funding, it would be difficult for our district to provide the necessary technology infrastructure and connectivity. The E-rate program helps to level the playing field for our students. However, I believe that the per-student calculation should be increased for low-income schools that have been identified as needing extra support. This would help to ensure

that all students have equal access to the necessary technology resources. Unfortunately, due to inflation, the cost of goods has increased significantly, which has decreased the purchasing power of our allotted E-rate budget. The budget allotment has not kept up with inflation, making it even more challenging to provide the necessary resources to our students.

194 PreK students need to be counted in the numbers. They are part of the schools they are in.

195 E-rate is vital to our school district.

196 It would be useful if security cameras and related electronics were covered by eRate.

197 It would be VERY helpful if USAC reviewer requests and communications regarding EPC filings would send an alert to the email account on the application so responses could be made in a timely manner. Often times, these requests and funding decisions (especially if 6-7 months pass before funds are committed) go unnoticed unless you're constantly checking every EPC communications link for each and every form. This is very challenging and inefficient for all involved. It causes appeals needing to be filed in an attempt to resolve potential penalties and fines. It also is a very time-consuming and long process to get to a resolution. I hope something can be changed regarding notifications of funding and any reviewer communications.

198 Stop initiating PQA audits during the filing application window. Make EPC easier to navigate.

199 Our rural, small county could not survive without the E-rate program.

200 The most cumbersome part of EPC is that all entities do not show on the same page and you have to go through multiple screens to see all entities.

201 Though Cybersecurity is on everyone's mind, the cost to use the most simplest hardware/software is cost prohibitive, especially for school districts. Superintendents don't understand the need until they are faced with a dilemma. It would be great to be proactive in the cyber security field.

202 The USAC system is not easy to use, the amount of inquiries is excessive, and communication with USAC is poor at best in my experience.

203 VOIP phones should be covered since they connect to our network

204 All Content Filtering via Firewall subscriptions as well as all Firewall should be 100% discounted by ERATE. We are spending more to protect our data now than ever and ERATE is not helping on this front.

205 The two most important items we would like covered by e-rate in the future are cyber security equipment/services, and dual internet connections for load balancing and high availability.

206 More knowledgeable ECF staff.

207 The E-Rate money is very important. The EPC is pretty good and USAC is responsive. The overhead time cost of complying with FCC rules related

to E-Rate is onerous and challenging for well-resourced organizations; forbidding for small organizations.

208 I love the e-rate program, but being a bit unfamiliar with the application process makes it difficult to apply.

209 We continue to be extremely grateful for these funds in our district. Without them, our network would be archaic. It would be great if EPC were a little easier to use.

210 It is critical that Next Generation Firewall support be allowed. The current risks to schools and library's due to inadequate firewalls to address current threats could be avoided by allowing funding to support these devices and or services.

211 Without E-rate funding, the high cost of internet would make this nonprofit library system unable to provide free high-speed broadband connectivity in our 6 branches located throughout the county (ethernet and wifi). This rural county still has areas without any internet accessibility and the library is the only place for these residents to access the internet using public computers and personal devices. Many library users visit every day or week to use the internet as access is either unavailable or unaffordable to them. In addition to using ethernet for public access computers within the library, the E-rate program allows the Library System to provide free wifi 24 hours each day inside and extended to outside the buildings. Residents often sit outside the libraries to use the wifi when the libraries are not open to the public. USAC has been very supportive and quickly resolves any questions or issues the library has needed to deal with. Due to filing a late application, I learned that the FCC is also quick to respond and help with the waiver process.

212 Excellent program for our community and education. Thanks.

213 E-rate program has been a great success in regards to our school needs.

214 Your website is hard to use and outdated. If I submit a contract that spans 3 years, why do I have to reenter the information each year? You need a complete overhaul.

215 Deadlines are very important. I understand the need for using calendar days to calculate deadlines, but if we are being rigid about these application deadlines, please leave room for error or else just explicitly specify dates for each form deadline (including the, most important, 472 form). Penalizing communities based-organizations for missing an invoicing deadline by a few days really contradicts the aims of this program. It especially hurts to have this happen after doing all the hard work of rfps, applying for funding, implementing and starting service, and documenting. I truly value this program, but feel we can do better in these areas.

216 While improvements have been made, EPC can still be clunky and not intuitive, very confusing at times.

217 The E-Rate program has helped our Head Start program greatly. Wished that more of the Cybersecurity and VoIP services were allowed. Also the Telephone was covered again.

218 Appreciate the phone calls whenever we have questions. Always happy to assist us.

219 Without E Rate, significant financial obstacles would remain- grateful for every dollar received

220 It would be nice to see all activity related to selected FRN's in one place - so you could select FRN's or application numbers, then there would be a column that showed the application number, FCDL approved amount, Form 486 status, BEAR form/invoice number, reimbursement date/amount, etc.

221 With educational services being so dependent on technology, USAC needs to fund whatever schools need to provide the resources for instructional services.

222 E-rate is a wonderful program that benefits our district greatly.

223 EPC is confusing, and makes it difficult for the district to process E-Rate requests. The selection tree is confusing and the rules are skewed toward the vendors having the ability to easily submit bids, unfortunately this causes many vendors to use automated tools to spam the district with bids that do not match the request. It also makes the review process confusing, and difficult to get projects approved due to technical difficulties in selecting the correct services.

224 Being a small district, it would be nice to utilize some of our funds for other things that our general budget doesn't allow for. I have only been at my district for a few years and I have just finished upgrading everything I could via the E-rate program. Our budget resets in 2 years, so it would be nice to see some things added to the approved list, that we could benefit from. Not really sure how the whole process works, but VOIP would be nice if it was added again, as well as building security measures (i.e. cameras, access control, etc.)

225 This was my first year filing all the various forms - 470, 471 and 486. I feel had I not had the services of our Consulting Firm to help me fill out all the forms I would have been lost. I am sure it gets easier from year to year though.

226 We appreciate any and all help that the E-rate program can provide to the Public Education System! Every penny counts!

227 Content Filtering is a requirement, in order to be able to apply for E-Rate, but Content Filtering is not currently eligible. We strongly believe that if any technology is a prerequisite for eligibility, then that technology should also be eligible.

228 I would like to reiterate not only the need for cybersecurity funding from the U.S. government for educational organizations as a matter of improved operations, but also as a matter of improved national security.

229 One of the biggest issues we see is the length of the entire process. Sometimes it can take a fill year from start to finish after inquiries, questions, audits etc. When IT people are only 1 person in a district the erate process is really lengthy and overwhelming. If it ever got to the point where we could just select from a list of approved vendors/items, and the discounts could be applied and then the vendor would have to work with USAC to answer any questions about the device/services and how they are erate eligible it would be very beneficial. As it is now, when the inquiries come in we have to drop everything else to work on responses.

230 It is not enought that we have an internet connection, we need to have a backup connection and the ability to protect students that use that internet connection. Cybersecurity is very cost prohibitive and not something we can implement without erate funding

231 Many phone systems are utilizing network infrastructure and solely rely on the internet and should be E-rate eligible.

232 Software defined network licensing

233 I don't understand why we have to go out to bid/RFP on services/hardware. Isn't that the reason for filing a 470?

234 I struggle with the process having only done it for two years. However, there seems to be a lot of resources and help in place. Erate is one of the many responsibilities I have, so having enough time and knowlege is difficult. I wish the process was a little less stressful.

235 Due to our rural location, there are very limited options. If more carriers could offer service, I think it would make our bidding process more competitive. Maybe the Erate program could help attract providers.

236 We need major help in education especially in our state with including CyberSecurity in E-rates. We do not receive any support from the state like other states and Technology Departments are falling behind here.

237 Our State Coordinator is great. She walks me through the process each year and makes sure I understand the entire process.

238 I would hate to see home internet paid by taxes because it's not used for education in most cases, and especially not if there is any possible detriment to or reduction of E-Rate. There are still incompetent and unscrupulous vendors taking advantage of schools and the program by low-balling bids and doing shoddy work. I get trying to save money, but even us small districts have built complex networks where not just anyone can step in and be successful.

239 We are extremely grateful for this program!

240 EPC has improved somewhat but there are still times when one must fumble around quite a bit to get to the right page or function, and hardly any "help" screens to help. It is still is common when calling the Client Service bureau to get an incomplete answer or even one that is only partially correct, and even wrong. This is frustrating. Sometimes it can take several calls or cases to get a matter resolved. High turnover and lack of training at USAC are no doubt the problems. It is really frustrating that it takes a convoluted process to get the directors of libraries changed when there is staff turnover. Sometimes directors are only there for less than a year, and it's so tedious to go through a long process to get the names and emails changed. We used to be able to call or submit and email and it was done. Often, the E-rate contact is the only one who understands the E-rate process and ever accesses the EPC. It's difficult for other staff when they have to get involved. Another edict that is not an improvement, is having to retain all forms and invoices for TEN YEARS. Our county government only has to retain forms from 3-5 years until audits are completed. It's ridiculous

that E-rate is treated differently. With all the turnover in schools and libraries, this rule is really onerous. Who would be able to address an application or invoice effectively after the fact. USAC's rationale for this is not defensible.

241 The system of approval and follow through is extremely difficult and burdensome and is a wall against progress for small schools in rural areas.

242 Erate is very focused on Internet connectivity and network access. Both are getting less and less expensive leaving more funding on the table some years for schools. My advice is to provide Erate funding for student devices as well! This is the first piece in the chain to get students connected. This would also reduce the Erate mess of what is allegeable and what isn't in the networking realm. Simple applying for students devices and getting a set reimbursement yearly would simplify the process. Networking purchases could be done without Erate if the funds have been exhausted from buying student devices.

243 This is a program that continues to support our mission to support students i the digital age

244 Making funds eligible for Cybersecurity is critical. The cost and scope of services is crazy high and it eats budgets very quickly. Backup services would also be good to allow inside E-Rate.

245 The program would be easier if funding were left to a single five year cycle for category 2 and a continual window instead of the Q1 process in place right now. It would help to have tolerance for honest mistakes and an amendment process to fix them without having extended audits and slow approvals.

96 Other critical services like our CMS for website hosting and cloud and on premise filtering of devices should be considered essential and allowable for E-rate.

97 Onboarding for new users. Frequently new staff are left to figure it out for themselves. This can be frustrating.

98 Continue the good work that has been done. Help clarify basic maintenance and Cat 2 support, still very cloudy on many of our request.

99 Faster process

100 If cybersecurity solutions/products were E-Rate eligible school districts across the country would benefit tremendously in protecting children and making our networks much more secure.

101 Where we struggle to find adequately trained network administrators, funds for training and certification (CCNA, CompTIA N+ and Security+) would help.

102 I think USAC is moving in the right direction year by year by improving EPC and easing the filing process and adding new eligible services to E-Rate.

103 Thank you for the opportunity for schools to choose the E-rate program to save money. Your work is appreciated!

104 I believe that it is the Federal government's responsibility to ensure that there is free and open education for all people as guaranteed in the US Bill of Rights. This day and age the internet is essential to not only education, but also free speech. Therefore, anything that enables schools and libraries to have public internet access is essential to be funded by the FCC or other tax enabled entities that will benefit all peoples residing in this country.

105 We really need more funding in a 5 year period than what is currently allowed. It isn't enough to keep our systems up to date. While I kind of like the flexibility we have now for distributing funding within our district (to any school as we see fit),

it created a big problem for us. Our superintendent heard about the rule change that allowed this, and he directed us to use 100% of our district's funding (for all 5 years) to a single school for a pet project. Now, the aging networks in our other schools are not being addressed. How about going back to the per school funding model but continuing to calculate eligibility based on district wide poverty levels. This would be more equitable than the previous model in which some of our schools got way more funding than others.

106 Overall we appreciate the support and funding offered. In this last window we had some ongoing paperwork issues that were hard to resolve. paperwork

submitted was the same as it has been in previous years so I am not sure what changed, but getting it fixed was very time consuming.

107 The program is too complicated and way too long that is why so many librarians aren't trying for it. And the ones that do, just don't like it or want to do it.

108 Please find a way to fund cybersecurity for schools.

109 We still lack the ability to provide any or reliable internet service to rural parts of our district. Cell coverage is poor and private companies refuse to run fiber or new service due to the lack of financial benefit to them.

110 1 - Since we are required to implement internet filtering to prevent access to objectionable sites, content filtering services should be eligible. Some of the services are rather expensive. 2 - Given the rapid increase in cybersecurity threats, services to combat the threats should be eligible.

110 Cybersecurity hardware and software should be included in Erate program

111 Keep up the great work

112 The EPIC site and applying process is HORRIBLE. We can't afford a SPECIALIST to do this. I trudged through it and ended up 2 days late. I hope it still goes through, Yes I applied

for a waiver but Haven't heard a thing on whether it was approved???? Tell me NOW?

113 It should be easier

114 We appreciate the discussion about funding next-gen firewalls and network edge protection and look forward to the FCC making such products eligible.

115 We are dependent on E-Rate for Internet access and for network infrastructure.

116 Rules over switch usages is disadvantageous in the current environment (everything is going to IP within a school building-cameras, door controllers, etc.)

117 One drawback from my experience was the timeline was too long. It has been about 1 year from when I first submitted my RFP until the equipment arrived. Some of this was due to supply chain issues. I don't like being pushed to accept the lowest bid. We had less than quality work completed by 2 of them. Since school districts are high targets for cyber-attacks, and uneducated staff are our weakest link I feel thoroughly protecting school districts is a must, but we need funding. It's very expensive. Not to mention having trained IT staff to maintain the new objectives. My district is down 2 IT staff and is not planning on replacing them.

118 I strongly believe that cybersecurity needs should be eligible for E-rate funding.

119 The PIA review process needs to be re-evaluated and staffed with highly qualified reviewers who can help customers work through their reviews before the need to "beg" for higher level support.

120 With the increase in cyber security incidents, I think its imperative that USAC cover some form of cybersecurity protection in order to protect the networks that schools/libraries are creating and maintaining for their communities.

121 I would like the bidding process to stay the same. I support our local communications network and am quite pleased with their immediate attention to our needs and their excellent support.

122 Our E-rate Coordinator has been exceptional in providing timely training and support!

123 Small Rural schools need more support to be able to purchase technology to protect our students, staff, and other computer systems. Security training and propper security is cost prohibitive, and therefore not a priority most of the time.

124 Please allow Cybersecurity services and devices to be procured through the Erate program. It would be an enormous help to us all.

246 Reviewers need to be more objective. What is funded and questions asked varies by reviewer. This makes it extremely unfair and difficult.

247 Continue to expand training and offerings for support in Cybersecurity

248 Internet connectivity is important, but 25% of our students don't have access to devices (beyond a phone) at home. ECF was helpful, but creates a financial cliff for districts. Inexpensive (or subsidized) end used devices should also be eligible.

249 Telephone service should be included cyber security should be included

250 As part of the competitive bidding process, we should be able to bid specific equipment that we currently use so that we do not end up with a mix of manufactures and equipment to support and maintain.

251 I could have used more training this year becuase this was my first year submitting an erate plan

252 School systems need funding for Internet Filters to maintain CIPA compliance.

253 E-rate has been a Great Help our school system

254 The overall explanation of eligibility and the application process is not as transparent and user-friendly for charter schools without district support.

255 Content filtering for CIPA compliance should be funded by ERate since it is a mandatory requirement.

256 According to our consultant, the application process has increased in complexity considerably over the last few years. E-rate is a great program but we need to keep it simple as possible. When it becomes so complex that no one wants to apply, the program becomes undesirable.

257 The PIA reviewers need to improve their process. They are asking questions that can be found by simply looking at the Form 471.

258 The program has made internet access much more readily available and affordable to millions of students across the country and hopefully it will continue to do so and expand the eligible products and services to better meet the needs of students, schools and libraries in the future.

259 There needs to be a lot of webinars, PD, and trainings on E-Rate, especially for beginners who are new to the E-Rate process.

260 Please include cybersecurity

261 In our city, we have families that do not have access to high-speed internet connections, because they are in remote areas unserved by local internet service providers. So, we are working in trying to make a broadband expansion with CDBG and ARPA funds in one of the rural wards. Next year, we will have another library in our E-rate system. We are happy of having you!

262 Thanks for this opportunity

263 Schools don't have the funding to adequately secure modern networks from cyber threats.

264 Our counties are rural and poor so the USAC E-rate program is extremely valuable to our success.

265 The E-rate program is vital to our existence and success as a library system. Being able to use firewalls, access points, and switches gives us the ability to effectively fight cybersecurity.

266 We very much appreciate E-rate funding but it is a very cumbersome grant application process.

267 E-rate should also cover video security cameras and equipment, as it is plugged into the IT network.

268 The whole process is incredibly difficult to process. Many other school systems hire vendors to fill out all of the applications or application forms as it were, for them. This cost money that would better be used to pay for needed items if only they could simplify the process.

269 We truly appreciate the discounts we receive and have come to rely on those to help manage other parts of our budget. We opened a new building this year and it took many adjustments in the USAC to get things corrected. It seemed to take a lot to make a pretty straight forward change from closing a few buildings and opening one new one.

270 I believe that school districts can do more without additional funding just by opening up E-Rate to allow for additional technology enhancements. This is a win-win for both the districts, taxpayers, and their students.

271 The biggest gaps we see in providing connectivity in our public library system: -- VOIP/phone service -- affordable Internet that meets National Bandwidth goals (gigabit speeds at all locations) -- all aspects of cybersecurity, especially endpoint protection, training, software and hardware applications to protect eligible services

272 Cyber security funding is a critical need. Adding FCDL to the forms available for viewing in EPC would be very helpful.

273 Although the process is relatively simple, it is always a little overwhelming for me each year

when I submit the information, I am afraid I am going to enter something incorrectly that will keep us from being approved. We cannot afford someone to complete the information for us, so I (principal of a small Catholic school) does this each year. There have been times due to my other duties that I failed to get things completed on time, missing a deadline. Anything you can do to make the process more simple, thank you. Your support staff are all awesome! I have not spoken to one person who was not more than willing to help me. Thank you.

274 Our State Coordinator is the only reason that most of us get our paperwork done on time and submitted correctly. She is simply amazing.

275 Keep providing this service as it helps to build America.

276 Erate has been our lifeline to achieve a robust internet connection ubiquitously throughout our school division.

277 I have been doing e-rate for 16 yrs and I have been to upgrade all of our schools and have 10gig to ISP as too all the schools 10gig connection. Thank you E-rate to make this all possible.

278 Since we are required to have filtering as part of CIPA, filtering costs should be e-rate eligible. We are getting a discount by going through e-rate, but then adding additional costs by having to get and administer filtering. Please make this eligible for discounts!

279 We could not meet the demands of connectivity without the E-rate program, NOT AT ALL.....

280 The process for e-rate is way too cumbersome. As an example, clicking an incorrect box but submitting an eligible item that e-rate approved then after the district completed the project e-rate denied because the wrong box was checked put our district in a place where financially it isn't worth applying for e-rate. You cannot rely on them being reasonable or listening and you cannot rely on their approval of a project.

281 Please place the quarterly reimbursement reports back on 8 1/2 x 11 paper to make them easier to file.

282 Our State Coordinator is an amazing human being. Buy him some flowers and say they're from me.

283 having an antivirus support would be great

284 I just wish the EPC portal was more user friendly. I have been using it for years but still struggle to find thing sometimes (uploaded contracts, etc)

285 Dealing with E-Rate is a nightmare!

286 This is a very valuable program, especially in rural communities. Please continue the good work you are doing!

287 I always appreciate the outstanding support that I receive when I call for support for E-rate applications.

288 There needs to be a physical inspection of libraries and schools to see if they are actualy using the funds for the intended purpose

289 Content filtering and hardware/ software related to cybersecurity, along with the possibility of managed services to go along with hardware/ software, would be a wonderful addition to eligible services.

290 The jargon is what makes the EPC so difficult to use. These applications are being made by non-technical people, and should be in simpler language. For instance, when I apply for help in paying for my library internet bill, the first question is, "How many?" How many WHAT?! It makes no sense to me...How many libraries? How many computers do I have? What?!

291 The experience is satisfactory

292 Really interested to see how cyber hygiene can be supported for k-12 organizations and schools.

293 The process overall is difficult in that you have to remember to do all of the applications, invoicing, etc. It seems as if they come at the time when schools are busiest with other things like audits, budgets etc. I don't know if there is a way to streamline the process.

294 Please give a longer time frame to response to questions, i.e. more than a 1-10 day turn around time frame. Thank you.

295 Since the FCC provides free phones and a minutes package to those who qualify, why shouldn't a library qualify for discounted services. We have people waiting in line to use our public telephone that we have to pay full price for. The phone is as important as internet service.

296 After completing our 470 this year it is difficult to find what equipment and licenses qualifies and at what percentages. A better approval/audit process needs to be implemented. We received several changes required/made to our 470 over multiple weeks and months when all of the changes could have been performed the same day.

297 It would be wonderful to add wifi hot spots for off campus use to eligible services.

298 While I handle all of the E-rate processes myself, I can't help but wonder why the process is so difficult that a tremendous number of consulting firms profit from organizations who find the e-rate process too overwhelming to tackle on their own. Surely, the process can be simplified to enable organizations to handle the process on their own without spending additional funds on consulting firms.

299 EPC portal needs to be user friendly and also the application process, should be simplified, terminology is awful and approval process is extremely long.

300 I dread every time I have to use your site. It is not user friendly. I am thankful of the support I have from my state department for their help each time a form is due.

301 While filing for discounted services has improved - it could still be simplified.

302 Services are fine, but the signal is weak in many places of some of the school buildings.

303 It would be helpful if providers were required to share the cost/ownership of data/VoIP transmission lines. It would be better if the local government owned the transmission lines and the providers were required to maintain/install the lines.

304 I found that some of the requirements for completing forms were difficult to understand which added to the amount of time it took for me to complete the forms and received a commitment for funding.

305 The application and forms are terrible and difficult to understand since this isn't our normal world.

306 So far good site to work with

307 E-rate is a lifesaver for our tiny, rural library. We would not be able to afford equivalent internet services without it.

308 Having been involved in E-rate for 20 years I have seen some changes which are troublesome. It seems that the personnel hired to assist applicants are either "off-shore" support or are individuals who know very little, if anything, about the process. At times it feels like they are simply checking off boxes when performing a review or responding to questions. It would be encouraging to know the support staff knew something about the application process.

309 **E-rate has been a godsend for our community. As budgets get squeezed, it is difficult to keep network equipment up-to-date.**

310 The biggest issue I have had with the USAC site is browser incompatibility that makes it extremely difficult to complete annual filing.

311 I would like to see USAC send all previous registrants a tradition "1 year calendar on a page" view of the various E-rate application periods, including the time span, beginning, and end dates for Category 1 and Category 2.

312 It seems when I submit form 471, there is always a problem. I can call & get.help, but I spend WAY TOO.much trying to figure this out.

313 I had a problem during the PIA review. The PIA reviewer never emailed back to my question. I sent an email directly and made an inquiry in the EPC.

314 Thank you for your continued to support of schools!

315 Great funds for our Organizations.

316 The customer service representatives have always been great!

317 The erate program is amazing. The process on the USAC Erate portal is very cumbersome.

318 When I went out to bid for category 2 funding, the estimates were higher than if we did these things in house. I feel that vendors know that they can charge more if e-rate is paying a portion.

319 E-Rate is of great service to our school district and community.

320 Look at the option for cloud based system to be eligible. Content filtering, phone systems, etc. are all moving to the cloud and this program should support Operating Expenses not just Capital Expenses.

321 If there is any way to make this process less time-consuming and easier for me,

as the recipient, and the contractors who provide the service, please do so.

322 I have done at this time.

323 We really need secondary internet connectivity for Fault tolerance as internet access is critical to instruction

324 I found the system challenging to use and is not necessarily user friendly for school systems that do not have a designated technology expert. The DOE supports have been fantastic and without them, I would not have been able to complete the forms.

325 I continue to get confused regarding the categories of internal connections and maintenance. PIA reviews make it more difficult because all that is mentioned is that the 470 doesn't support the request even when the names line up. Any clarification and simplification would be greatly appreciated!! Thank you!

326 Anything Cybersecurity is absolutely essential

327 I believe that you should make it easier to file for funding. Right now the application process is way too long.

328 The biggest issue I have with the bidding process is it usually isn't fair with most hardware vendors. The reason is, one organization locks special pricing for the equipment, so it doesn't matter how many bids you get, it is usually who registers your site will get the best pricing. It should be making vendors can't use registration when bidding and it has to be a fair bidding process.

329 I would like to see the bus wifi program continued to be funded. We were able to provide internet access to our students this past year, but worry because of cost that we will not be able to offer this. Many of our students are on the route for 30-55 minutes. Access gives many of them an opportunity to continue to engage in learning until their stop arrives.

330 The process needs to be streamlined or made easier. The process takes a huge amount of time and resources from tech staff who are already overwhelmed with day to day items.

331 I think the biggest help to schools at this time would be to allow E-Rate funding to be applied to Student 1:1 devices for schools. That is the largest chunk of money that we need to spend and it is getting harder and harder to maintain student equipment.

332 Eligible goods and services should be expanded and it should be up to us to decide how to best take advantage of our category 2 budget. If money in the program needs to be managed or curtailed, then work on equitable means of determining budgets. Category 1 should still be primary.

333 E-Rate is amazing. However, we would like the application process to be simpler. It would be great just to make a change in the funding year, and keep everything the same without filling out new applications. Applications should just renew automatically if nothing has changed, such as provider, and or services requested.

334 Thank you for making this available to our state Libraries. It is extremely helpful to our budgets!

335 The bidding process and rules continues to take up considerable amount of time on tech departments that are already strapped with shrinking departments and increased work loads. Schools should be able to select their product & vendor choice for equipment & services deemed critical and effective in their network.

336 Our Category 2 BEARS ALWAYS experience massive delays and require additional documentation. I have submitted inquiries to USAC via phone, email and case number on how to facilitate the process, but gotten no answers. We are willing to make any necessary changes, and feel very frustrated that no feedback is available for us.

337 The website is EXTREMELY difficult to use and confusing. I have to re-learn it every year. I also have had no response on our ECF funds and it's been over a year.

338 We pay a service to help with the filing of our applications and without her telling me to check this box or fill

out this piece, the applications are sometimes difficult to navigate since im only in it once a year. Its more of a if I don't use it, i lose it type of thing.

339 The process is so difficult we had to hire a consultant to fill out all of the paperwork to apply.

340 The portal is not user friendly

341 I have seen many great enhancements to the filing process over the years, from excellent training materials to easier-to-use portals. The process still seems overly complicated. In my small organization, I constantly evaluate the cost of my time compared to amount of the award. The effort has become less worthwhile since telephone service has become ineligible.

342 I am always disappointed with the lack of communication from EPC. They will send an email, but if I ask a question in that email, I never receive a reply. If I receive a reply through the system, it's a case that has been created & is then closed. There is no interaction that

is satisfactory. In particular, when dealing with Emergency Connectivity the fight to get the money that was approved was ridiculous. The amount of communication it took was disheartening. Since then, I have received a reminder that I had money to spend. I replied to the email, and noted that we hadn't purchased more items, but if we could do another purchase prior to 6/30/23, we would. I never received a reply. I went into the system & repeated the question & have not ever received a reply. Please note that I do understand that you are dealing with federal money & have many hoops to jump through. But the process is ridiculously cumbersome. I am a business manager in a small district, and this is one of many things that falls on my plate. I make time to fight the fight, but that often means other important things not getting done. I have started to question if the money we receive from ERate is worth the fight. It's particularly frustrating when I attend workshops & hear that there is a significant amount of money that no one ever claims. With the fights I have had with your system & continue to have now, I, unfortunately, can understand why the dollars are left on the table. Thank you for the opportunity to give my feedback.

343 E-rate allows us to provide a high quality network for our students and teachers.

344 I am overall happy about the eRate experience I have had over 15 years. My only significant complaint is EPC - I don't think it is very intuitive to navigate.

345 I am still waiting for a determination on my ECF Wave 3 funds. It has been about a full year since I applied. Because of this delay I have had to defer ordering more wifi hotspots for my library, and we are disappointing our users who rely on these devices regularly for internet access at home to study and work.

346 If I didn't have someone at the state level to assist me in filling out the USAC application for CAT 1 & CAT 2 each year, I wouldn't know how to answer the many questions. I believe that only larger institutions who can afford to a Tech person are in a position to complete the filings without help.

347 I find it difficult to get on the USAC site and find my way around.

348 The PIA process is too aggressive. I spent a couple of hours responding to questions for a location we didn't even ask for funding for. The process is too cumbersome. For the last two years we didn't even participate because the time sink outweighed any discount we received. We participated this year because of a state-wide project.

349 A few of the questions I was not sure what they meant. This is my first year at this job so first time dealing with E-rate and a lot of it was very confusing. I had no clue about it until I got an email from my district consultant that I needed to apply. Hopefully I will understand it better next year.

350 As a first-time applicant, the process is very convoluted and akin to manually filling out tax forms: if you don't know all the definitions for each option, it requires having someone else assist you.

351 The process of applying is daunting, thank God to our State Coordinator!

352 I think that many libraries do not use e-rate because they are then required to use a filter on their computers. To some people, this is a violation of the Freedom to read act and the constitution.

353 The E-rate program helps our organization tremendously and we would not have the functionality without it. However the website to apply for E-Rate is very difficult and there needs to be a description of what each report is for.

354 The application process is very challenging. I run a small rural library and i am usually here by myself. Trying to follow the process with constant interruptions from patrons is nearly impossible. I have to work additional hours to come in specifically to work on Erate. Every time I do it, I feel like it's the first time and I have to relearn it. It is not intuitive at all with no explanation along the way.

355 Applications that are the same year to year (no changes) why can they not be renewed? By the time I receive one of the passwords it is timed out. The whole password thing is very cumbersome.

356 Would have listed I don't know for some of the answers. I didn't know the answer but had to answer something because it was required to answer something.

357 I am a first time applicant, and found the process confusing and frustrating at times, but your customer support is top notch. They were very patient with me, and helped guide me through the process.

358 Thank goodness for the program. Every USAC person I have contacted is very friendly- but some have given me incorrect information. All of my reviewers have been really helpful. The website- which I tried to sign into access to answer questions was just looping on chromebooks- so that is an issue. I am not sure if chromebooks are supported to go on the USAC website- but they should be if not. Thank you!

359 I appreciate the E-rate program so much, It really helps our small library with costs. I do agree that the site has gotten easier to use.

360 Customer support has always been a strong point. The erate was originally set up to help small schools and libraries with Internet and phone connectivity-would like to see that return. Seems like we lost phone(POTS and cell) when USAC went to WIFI connectivity.

361 The e-rate application process is cumbersome and unwieldy. I tried to make a change to my e-rate application and could neither talk to a competent person nor did I find a simple way to alter the request. Overall, I give USAC an F.

362 Thank you for making this service available, without it many public libraries would not be able to provide internet service for public. Since filtering is required it would be great if e-rate would help with funding.

363 I believe the E-Rate program MUST include eligibility for Cyber Security investments / costs incurred by our district. The costs are out of control and not realistic to maintain without assistance.

364 I think security products should be included as this is part of providing a reliable and secure network for all of our users.

365 Schools are becoming more common targets for cyber-attacks. I would like to see funding provided to help K12 combat the threats.

366 I am new to E-rate, and the EPC help desk has been very, very helpful over this past year. I truly appreciate the time the help desk people spent talking to me to understand my problems, giving me information, and helping me fix the issues I was having. I also attended several webinars and those were very informative and helpful as well. Thank you for the resources you provide!

367 The application process is long and unorganized. It's a hurry and wait process. And we have no idea how long the "reviewers" will take to approve each step. Makes it stressful and time consuming.

368 No Comments other than E-rate saves us money every year, and as we operate on an extremely tight budget, every bit of savings is important. I wish we could still apply for phone assistance as well as Internet.

369 Overall, I am satisfied with the ease of using the EPC portal and the eligible services to date. However, technology needs change quickly and the E-Rate program should be mindful of school and library needs for increasing eligible services.

370 Dual ISP using unique path needs to be financed by USAC. This is critical for school safety in todays world. Schools are targeted by Cyber criminals as a result of the US government actions and policies; therefore, it makes sense that the US government to finance a good portion of our security products. For a cybersecurity category, procurement needs to be different. If many schools use the same combination of products / solutions, it will create a huge incentive for the attackers to invest a lot of time to find the weaknesses in that set of product. Also, there should be for this category a stronger process for the vendors to qualify. I see too many products / services that are not sufficiently robust. Most IT staff working in schools don't have the education and experience to evaluate the quality of these products. Also, too many none technical people get involved in the purchasing process.

371 The process seems a bit complicated to me as a newer Library Director and the process still confuses me a bit. I am going to have to work closer with USAC and local librarians to make sure I get the process right. I took on on-line review but would like something that explains the process step - by step that I can download and print.

372 It seems silly to support devices and transport but not to support safety / security items.

373 When filing for Dark Fiber or anything else that requires asking for other services, have those services automatically added to the 470. This would help to ensure that all the requirements are met and that the system is not set up for failure.

374 Please make the waiver process easier if you happen to file late for E-Rate. Also, dual connections and security purchases should be included in E-rate to help district budgets.

375 I see great improvement in eRate the last several years, but it would be great to have a better representation for small rural school districts.

376 Cybersecurity tools should be included.

377 CyberSecurity would be hugely benefitial but the competitve process does not lower the cost for applicants. If the FCC or USAC had options available that they had vetted and ensured a low starting cost with their influence it would be helpful.

378 As a member of a Cyber Response Team, I have seen many incidents that have come through that would be solved just by having even basic cybersecurity protections in place, protections that are expensive for school districts to purchase.

379 I find EPC to be difficult. And actually the whole e-rate process. Too many hoops to jump through. I have sent messages through EPC and not received replies. Call me old school, but I just want to fill out a form and be done.

380 The website is AWFUL. Trying to contact a person for help is practically impossible.

381 fund cybersecurity training, software and hardware period

382 Above all else, the changes made to the website in recent years have made the whole process much much smoother. I do wish eRate was applicable to anything technology related, including things like intercom and video surveillance systems. In light of all the security concerns, both digital and physical, all of these systems need to be integrated together and updated often.

383 Thank you for all you support this year.

384 Mandating the online safety of our students without subsidizing the extraordinary cost of a safe, moderated, secure internet, end-to-end, is not acceptable in this modern age.

385 E-rate has been vital to our small rural district. Thank you for all that you currently provide! I appreciate the opportunity for input.

386 Revenue limits in our state have not increased in a decade. ECF and ESSER funds are sunsetting, and additional recurring costs for cybersecurity initiatives are straining budgets. Any funds to help offset our cyber security initiatives or hotspot/bus wifi solutions will benefit kids.

387 We are thankful for the E-Rate program. Thank you for providing this survey to hear the needs we have.

388 District's need help with the vast number of IOT, computing and network resources with security from physical, monitoring, cyber and mitigation services for any cyber attacks.

389 Thank you for collecting feedback. It's imperative that schools receive assistance in order to obtain advanced cybersecurity tools to help protect our sensitive and proprietary data.

390 Losing VOIP Funding really hurt our technology budget.

391 We could save money if not for the timeline of E-rate. Theoretically, libraries in our situation can contract for "off the rack" publicly advertised internet services and use E-rate. However, since a vendor changes its packages constantly, and doesn't allow one to lock in a price except within so many days, we can't file a 470 with a contract/price point that will be good when service can begin in July. Very frustrating, when one vendor is really the only viable provider in our area, and competitive bidding is pointless.

392 grateful for the E-rate discount that allows the library to have good internet connections through our state network

393 Please consider creating levels of access in EPC. Currently having one super user able to receive reports, tasks, PIAs and certify documents creates a bottleneck. For example allow the superuser (CIO) to delegate tasks directors and managers.

394 Signing into EPC is a nightmare. Once in EPC, Category 1 process is far too complicated. There are questions that deal with technical language that I don't really understand - so I have to guess. Category 2 is so bad that I no longer even try to navigate the process even though we could benefit our sparsely populated area. Making matters worse is the fact that vendors go through hell trying to get paid. We have lost service providers (who are few and far between) because USAC does not pay them. Vendors have also said that working with USAC is so difficult that they will no longer provide their expertise to us because they cannot get paid.

395 Thank you for all the funding you provide to us a public library. The consolidation on the EPC landing page has been nice too.

396 The application process is confusing and the results of missing a deadline are catastrophic for small libraries.

397 Schools need to be protected from cybersecurity threats and school budgets aren't sufficient to provide that protection.

398 Thank you!

399 Cybersecurity is extremely critical. We desperately need funding for all related firewall and content filtering services/equipment.

400 Since our firewalls are not 100% funded, our library system will have to seek funds for other sources in order to keep our systems safe from intrusions. 100% coverage would better suit our system.

401 Telephones should be covered by Erate as they are an important in all schools and required.

402 Cybersecurity is critical to protecting our PII data and providing access to online curriculum.

403 It would help - especially for new applicants - if there was a glossary that decoded things like "SPIN", "FRN" and so on. Luckily, my state has started funding support through a 3rd party to help with applying for funding. After 7 years I am starting to get a feel for how things work but I still make mistakes that are hard to correct.

404 I just want to emphasize the area of greatest importance for us is to be able to invest more in cybersecurity. Secondary for us would be operational features like fail-over lines for Internet and communicaitons, and the ability to offset costs for VOIP services.

405 I feel the USAC application, creating the 471 and 472 forms are too compliated for teh average provider and wish the process could be simplified.

406 The application process/website is not user friendly.

407 The PIA reviews we respond to questions, quickly and it takes way to long for approval on our CAT 1 and CAT2 submissions. We need to have faster turnaround on our 471's. Waiting to long for approvals.

408 The process for CAT 1 services is straight forwarded. However, CAT 2 application is cumbersome. Our district does NOT outsource erate filing. We do it in-house with 1 person responsible. So many districts around us forfeit a percentage of their erate funding to outsource the work of filing and completing the erate process. I understand why. It is a cumbersome process, and it is becoming more difficult for us to

have someone internally file like the "old days" when every district filed on their own (very few outsourced the process). Cyber Security - We are taking a big hit financially with paying for the necessary items to protect our network. I honestly don't know who we can sustain all of the requirements for a protected network. We were hit by the Trickbot virus a few years ago, and it brought our network down. The FBI came in to help us. It was awful. Since that experience, purchasing things such as intrusion detection, MFA, malware filter, and endpoint detection is all we talk about. But, the district has to choose between some of these things because the cost is expensive, but the absence of them could take our network down again. It is a fear we try to balance. Finally, I do not know any districts in our area who aren't 1:1. When Covid hit, we were all forced to, and it has been a great experience. The integration of learning is so impactful when students have their own devices. However, that we 3 years ago, and the devices we purchased during that time will be EOL in a few years. What then? How can districts afford to replace devices in such mass quantities? In conclusion, I think E-rate can really help districts in these areas.

409 Existing per-student cap isn't keeping up with increasing costs. We have to depend on used equipment for most of our infrastructure.

410 We are satisfied with current services provided.

411 Years ago the intent of e-rate was to help small libraries, it included telephone help and apps were filled out with blue ink. I found out the blue ink thing was a big deal and was almost refused. Now it is done online. Thankfully, our state has a person who has helped us many times. Also the on line classes has helped. Changes to this can be frustrating. Just how many times have you made it harder to fill this out? Sometimes the questions could be simpler and not so legal sounding. Over the years, I read the lists of approved schools and libraries and the lists get bigger every year. Even government agencys get e-rate money. Just why does this happen?

The monies that some receive in one year is more than we will receive in a life time. And I watch ours and it gets smaller and smaller. Don't get me wrong, I love e-rate. Our library has been envolved from the very begining and we were only refused once.

412 The competitive bidding process doesn't affect us because we have few options for providers. We have a local provider, but all others are $1000s over their cost.

413 The program has good intentions but the beauracracy is a nightmare. I dread doing the paperwork every erate season. I fear doing something wrong and getting audited. Also, we are losing funding because of poor enrollment and lower Free and Reduced numbers.

414 All good

415 I feel like Cat2 submissions have been increasingly held up with questions that are actually answered in the quotes provided. Which has caused us delays and, at times, has caused us to miss out on funding for equipment. It seems that the reviewers are looking for reasons to not process requests instead of actually reading all of the information in the request.

416 The application process is very frustrating for certain network services. This is not beneficial to schools to receive denials because of a confusing process as then we have to wait another year and hope nothing has changed over the course of the year that would make us be denied again the next year.

417 The process is cumbersome, difficult and confusing. I know of entities that have decided not to pursue e-rate simply due to the process.

419 The portal is incredibly difficult to use, especially for small schools. Cyber Security needs to be covered, otherwise the cost for it can be considered a "tax" for using e-Rate to acquire internet connectivity.

420 E-rate is vital to small, rural communities.

421 It's ridiculous that Private Companies can charge us an inflated price because they know we the Public School Districts can file with E-Rate to get 80% of the money we spent of the product back. Also Wi-Fi on school buses is the dumbest idea ever. There are plenty of other things we need to buy in order to keep our school districts online and maintained.

422 The process is not fast, and it's not simple. There are lots of pitfalls associated with partial eligibility, and it's insane that NGFWs and management subscriptions (like cloud-based controllers w/ ML or AI insights) aren't eligible. It's like USAC is stuck in 2010.

423 I am new to the position, and I experienced much frustration with the E-Rate process. I do not believe I should have a unique email address. The library email address should be sufficient. It is the library that is the customer (not me personally).

424 Our libraries are in a rural area that has two options for internet service. As a result, the ERate program hasn't helped reduce our costs.

425 The amount per student for Cat 2 service needs to be increased. Our district has used the majority of its funds in the 3rd year of this current cycle.

426 Increased % funding for schools would be beneficial. A less complicated

418 This was my first year working with E-Rate. I found the process fairly straightforward and I received help when I needed it. Thank you very much for this resource!

application process and a broader range of products, i.e. a 3 year license for wireless support is not funded but a 1 year is? Forced to pay more does not make sense.

428 USAC should clean up and better define categories. For instance, the double listing of cabling for both Internal Connections and Basic Maintenance is an issue. We got burned by a USAC agent stating that replacing existing cables in a building was not basic maintenance as we filed, but was internal connections. There needs to be clarification and imo removal of one entry. Cabling from cat5 to cat6 is important for newer end point device speeds (especially multi gig access points) and having it delayed by someone who just arbitrarily decided it should be IC not BM, is problematic.

429 I am thankful for the funding we receive to support students in learning and am fully aware that we could not deliver the educational service needed without this funding. However, our needs have shifted dramatically over the past few years in terms of cybersecurity needs. From staff training to EDR and more, my local tech budget has diminished quickly to support these unavoidable expenses. I would LOVE to see the erate program once again support phone services as well as embrace the need for cybersecurity funding. Thank you again for recognizing ever-changing needs in our environment.

430 The $50,000 floor amount is far too low for smaller schools. I believe the floor amount should raised to $75,000. We still have CAT 5 (not 5e) that we're unable to realistically replace unless we choose to not upgrade the rest of the network infrastructure.

431 USAC should have more training for PIA reviewers; just a couple of many examples. *The eligibility of NIFs for s C1 service * Asking questions about entities that are not listed on the Form 471.

427 Purchasing certified refurbished network equipment would be a way to save and stretch E-rate dollars further

428 ...

432 E-rate funding has been very beneficial for our school district. Teaching and learning with technology with the use of the internet access has greatly impacted the educational process for the entire district..

433 Great to add support of Cyber Security products and services

434 It would be nice if services that grant network or device-wide compliance with CIPA were also included as eligible items.

435 While the process seems to be a streamline as possible, it is still confusing to use the system as a whole. To their credit, customer service seems to have improved over the years prior.

436 Discount should be based on criteria other than NFLP participation (e.g NFLP eligibility), which don't adversely effect small schools which are unable to provide the free lunch service.

437 Self-provisioned Wifi for communities should be allowed in the future. LTE/ Hotspots is not sustainable for home use for large districts.

438 Valuable program. Thanks.

439 E-rate is a large part of the reason our School District can provide a majority of the services we have to our students and teachers. We rely on Erate to help absorb the cost of out Technology.

440 The portal is not very user friendly. My tech partner and I constantly make multiple applications while trying to find our records and they are

not easy to delete. This makes it very challenging to ensure that we are both using the same form.

441 Network gear isn't sexy, and that's why it's hard to get funding from politicians. Being able to show the eRate discount, makes it sexier and a much easier sell to the public.

442 Please fix the log in page. When I paste the verification code, I should be able to just hit enter, but that puts me into a verification code loop.

443 While the erate program is greatly appreciated in that it has allowed us to make upgrades necessary to keep things going in our district and striving forward for students... the entire process is very frustrating and cumbersome. The EPC portal is also not user friendly in the least. PIA reviews are becoming a larger headache as the years go by...the reviewers also want to set a deadline for you to reply (and thankfully they approve your request to extend it without issue) but they don't always answer your questions in a timely manner. I would call but I would rather have print of what and when I asked something so I have my proof.

444 You are kept updates of the progress of a 471. I've not heard a peep about one I have out now and cannot get a response.

445 The fact you can only use an email address one time and for only one orgasnization

446 Thank you for the E-RATE program!

447 Within EPC system, please add the "Home" link back to the menu. With one of the upgrades several years ago, it was removed. Now, if you're working down in the system, you have to click on the icon in the upper left that takes you to the newsfeed area and then there's a "home" button there to get you back to the main screen of the system. Very inefficient. Also, within EPC, we have to hunt to find where some forms & items are located. It would be nice if there was a master list in the system with links to all of the different forms and items that we do (including

accessing PIA items). There is a partial list but it doesn't have all of the items on it. Regarding the customer service questions on the survey, it depends on who you work with. Some of the staff are nice and helpful. Others make you feel like they're trying to find a way to ding you or get you in trouble, even when you're contacting them for help to try to figure out how to deal with a circumstance. The E-rate system is complex and causes a lot of stress. When I attend education related trainings (not ERate ones) and the topic of Erate comes up, people in the room will tell others to avoid it like the plague and do not take it on with their job if they can keep from doing so. Many districts and service centers have gone to hiring companies to help them with their ERate grant application because it is so complex, difficult to keep up with all of the info and is very stressful. In my district, it could be a part time job. Unfortunately, I have the responsibility of it along with a very long list of other duties and responsibilities.

448 I find the USAC website frustrating and difficult to navigate.

449 Continue to let us solicit our own bids. Don't move it to a standard list of bidders. In our rural area, we would never get any competitive bids if we can't solicit them ourselves.

450 I find the EPC very hard to work in. Seems every year I have to change my password and cannot get into the program.

451 The reviewers have made huge errors and delays in our application the last 2 years, getting that corrected they also made huge errors

452 Maybe create a management tool on the site to keep track of all of our contract/subscription due dates (example: switch maintenance agreements, fiber contracts, firewall end of life)

453 The EPC portal has gotten better over time, and I've learned to get the job done, but it's horrible to navigate. It seems like there are automated review steps that happen, whether they are relevant or not. (Asking for copies & uploads of contracts, which are already in the system, for example. Or asking for additional bidding documents on a single or no-response 470.) Review staff often know less than about the program than those filing, but are pushy and unapologetic about their requests.

454 Overall satisfactory. Very valuable for our students education. Allows opportunities that otherwise would not be possible.

455 I appreciate this program and those that work to make it work.

456 I believe the most vital part of this would be the addition of cybersecurity components. We are a small two man shop with over 1500 students and thousands of devices and a small technology budget. Internal and external penetration tests, internal network audits, training, endpoint security, etc. are very cost prohibitive for us to purchase. Having a device or software applications in place to meet the cybersecurity demands of today's world, to keep our very confidential data secure, depletes what little local budget we have and puts an additional financial strain on us. I would beg you to please consider taking action on adding cybersecurity components to the eligible services list, whether it be Cat 1 or Cat 2. Any kind of funding towards this area would be of GREAT benefit to all! Thank you for helping our districts and we would not be where we are today without your help!

457 $50,000 for 5 years when updating and keeping up with current demands of technology requirements, access points, switches, routers and etc.. is not enough. We will have to put off updates due to lack of funding. As this cycle continues, I am concerned our district will keep falling farther and farther behind. We are in year 3 of the 5 year cycle. So we will not have funding available for 2 years and have equipment that is at end of life and we won't be able to replace it for two more years. By pushing those back then we will have to keep pushing updates back to replace those and I'm concerned it will spiral until our whole system will be outdated with no funding to bring back current as we are trying to catch up. I'm not sure what the best solution is to help our schools. There needs to be a better solution than the curent cat 2 funding.

458 Great service

459 Wow are real satisfied with the service and our provider   Thanks

460 We strongly believe fail over internet services (back Up line) should be included in e rate services. As School management systems and in class platforms become more important to our daily operation the dependency on the internet not failing becomes even more critical to continue providing educational services. We also believe VOIP and online Security services are critical as the dangers of the internet become more rampant and the need to maintain contact with parents critical.

461 E-rate is a greatly appreciated service which our students are greatly benefiting from.

462 We believe that next generation firewalls could be eligible even within the existing budget framework. If an applicant prioritizes the purchase of a next gen firewall, over the purchase of new WAPS (or other eligible equipment), they should be allowed to purchase it. This would allow the FCC to make next gen firewall eligible without changing any other aspect of the program. With this said, an increased Cat 2 budget would be beneficial to help with these purchases.

463 The forms and online applications are super confusing and seem different every year. I have applied since 2014 and it is NEVER an easy and simple process.

464 It is much better than a decade ago!!

465 The need to change Passwords so frequently.

466 When you need to reply to a message via the email you receive, once you sign in it's difficult to figure out where you need to go to get to that request. The only way I can figure this out is to login, then go back to the email and click on the link. It would be nice to click that link sign In and your are already where you need to be.

467 Anytime and every time I called in the Support team was focused on helping resolve any issues, we were experiencing with our application.

468 Would appreciate information about ISP carriers in the areas we do business. The turmoil occurring due to the elimination of copper lines has resulted in poorer service and dismal speeds.

469 Reviewers need to be more consistent. Currently, the rules are interpreted and responses vary upon reviewer. We have had three different answers on how much we will get reimbursed for a firewall. There is no consistency, and it is really frustrating. Reviewers should not be paid on how much they approve or deny. It's not up to them. The rules are the rules.

470 Very satisfied but looking forward to E-rate expanding to more eligible areas.

471 Thank you for all you have done for our schools.

472 It would be beneficial id USAC would be able to approve and provide Funding Commitments in a more timely manner. Waiting over 111 days and with 15 days before the new funding year starts with no Funding Commitment Letter really is untenable and unreasonable.

473 There is a lot of processes that could make everyone's lives easier. When you have to cost allocate items and submit forms every year, it just takes a lot of time and money that could be better spent. The forms can get complicated and there are a lot of gotchas that really makes school's suffer and thus the students do too. I wish the FCC and USAC would really listen and make changes to what the schools need. However, the time it takes for comment periods, the review, the response, it just makes the process long and drawn out.

474 Content Filtering should be the an allowable E-rate expenditure. At a minimum funding this critical solution at 50% would be a significant step in the right direction. Cyber security should also be funded by a certain overall percentage based on the overall funding available in a given 5 year E-rate funding window.

475 Off campus usage needs its own circuit and bandwidth so it does not affect our on campus usage. We cannot be penalized for higher bandwidth usage when the off campus usage exponetiates.

476 Thank you for your support.

477 If EPC was simple, fast and easy to use we would not need to hire E-rate consulting companies to help us with the filing process. The process is not simple or straight forward and rules continue to change. It seems that USAC hires reviewers that know nothing about Technology and send PIAs seem to show they don't understand Technology products and services.

478 The customer service at USAC is excellent.

479 In some categories I am not really qualified to answer, so wish there was an answer category for "not applicable," or "Cannot say."

480 2023 was my first time navigating the process in 20 years, it is much better, and for the most part the support is good, but sometimes it is not. You feel like the responders have a list of hoops to put you through before they are willing to simply anser the question. Eventually you get there, but you earn it. The login process should allow you to enter once entering the code for 2part authentication. filling a field and hitting enter is very common and it should be possible (rather than clicking the button). It gets me everytime because it is such an odd behavior. Erate feels like taking medicine that tastes awful...You swallow it to get to the cure.

481 Stay focused on managed services vs equipment. Make cat 2 an annual per student budget, start at $50 per student annual with a floor.

482 I think it would be important to look at increasing the eligibility of other cybersecurity and life safety products. This might include; higher eligibility rates for licensing costs and allowing for additional resources such as network monitoring tools, VOIP, and HA hardware including backup connections and failover solutions to be included in the list of eligible items.

483 More training

484 Anything cybersecurity related to better protect our schools.

485 The E-rate program has been critical for to supports our district to help students become successful and prepared for the future. Adding cyber security services along with access for kids would be invaluable.

486 Every time I have asked for help from USAC, I have received it. My interactions with the call center has always been pleasant and although I may be irritated with 'why' I had to place a call, I have always had a positive experience in the end. Give good people; good tools and the EPC portal is not a good tool.

487 USAC website would benefit with more user-friendly access. Sometimes I need to click too many tabs to figure out where to go.

488 All is good and seems to be continually getting better.

489 Services for nextgen firewalls

490 Please include security and telephony services for elegibility,.

491 I am impressed with the ease of applying and systematic steps in the process. I find the competitive bid and matrix format somewhat detailed since we have limited providers in our area.

492 The most detrimental thing about WiFi and accessing it is the fact that our technology consultants listed professional learning as N/A. There is a huge gap in knowledge about use of the internet at home or personal use and that of using it within a business or educational institution that end users may not even be aware of. They just know they need access for many required items in their job. Insurance rates are going up and staffing is being cut. Teachers and staff should be trained in the area of information security and have a solid research and development plan that is long-range and sustainable. I am currently working on this, but I am part time in my position working on making this job full time and encouraging other teachers and librarians to see the value in this job that they may consider this professional area in the field of education as they understand the needs of the end users.

493 If you could help us with funding in the cyber security space that would be a game changer.

494 This was all new to me. I have not correctly completed anything yet. I have tried over and over and simply do not understand. I have been told we qualify but I don't understand he ling and therefore never receive my ipads or reimbursement for ALOT of money. I am ignorant to these forms and so far I have reeived nothing except denials for doing the paperwork incorrectly. Overwhelmed.

495 Excellent service program

496 I consider myself to be very computer literate, but have experienced difficulties navigating around the USAC portal. Also, our passwords have to be changed to often.

497 E-rate is very much appreciated, but it would be nice if once high speed is connected or fiber there wasn't such a high monthly fee to use it.

498 I've been filing E-rate paperwork since it's first year. The system is so much easier than it used to be! Thank you!

499 The process to apply is clunky

500 It is vital to us. I do find the USAC website and forms confusing- but the reviewers this year have all been helpful so far. Thank you!

501 We had not previously utilized cat 2 funds and so 2023 was first time I applied and was given a funding decision letter. So that is why I feel the process was cumbersome and not intuitive but I was able to navigate through the Form 471 process with some help. And I don't expect to apply for 2024 funding since its our expectation to use all our finding on the project that was approved for 2023. Thanks.

502 Thank you

503 It would be nice to have a case manager who would help through the process so that the only option for guided support isn't payng a consultant, whch we can't afford.

504 We are grateful for the erate funding and do not wish to see it go away. However, it is VERY time consuming to participate in erate, even with the help of a dedicated consultant at the state level. I think often about leaving the erate program for this specific reason. There are so many deadlines to keep track of and the information needed is different every time. Organizations are spending a great deal of money in staff time in order to obtain erate funding, enough that I am not sure there is a large gain in the end. Please consider simplifying the program.

505 I have a hard time navigating the EPC/USAC website and understanding what to do. The state assistant for our libraries is wonderful to guide me through a form, but the assistant for schools doesn't help like the libraries does.

506 Process takes too long; platform is too complicated.

507 I have never had any interaction with the E-rate process before this year, I can with confidence say that the process was to say the least hard to understand and even harder to get things correct, Had I not been dealing a specific vendor that was very knowledgable in this area I can say with confidence that we never would have been able to get all the proper paperwork turned in correctly. Myself and one other employee stumbled our way through the process hoping we got things correct. As it stands I'm still not 100% sure we actually got everything done correctly. There appears to be no direct communications with the individuals reviewing things so we are guessing that we did this correctly. The actual application process is hard for someone who does not deal in these sorts of government programs, explanations of what is needed and what has been sent back for review or correction is anything but straightforward. The lack of explanation on issues or corrections is a huge issue and should be addressed.

508 I am very thankful for your program.

509 E-rate is critical to our public library. We have thousands of public internet sessions each year and our WiFi is used widely at each location every day. USAC bureaucracy is confusing and category 2 is especially difficult to understand. Could not survive without external consultant.

510 Because we are rural and the community in which we have our school does not have High Speed Internet available without the help of ERATE, we are very greatful.

511 Erate has been a great resource for our school district.

512 Please consider allowing school district to become ISP for their local communities that don't have options for internet or have options that are TOO expensive. ISP will not build out to areas where there is little return on investment.

513 Your website for applications, etc is NOT user friendly. Please make the whole application process easier for those of us who work in small districts and have to complete the applications but are not very techy.

514 Network intrusion detection is very necessary.

515 This funding allows schools to stay up to date with technology. Without it, the financial burden would be a significant portion of our school budget. This funding allows us to re-allocate dollars for teacher salaries and other instructional inputs that effect student outcomes. Our ability to stay up to date proved incredibly valuable during COVID. Without the wireless infrastructure we had in place, we would not have been able to pivot to virtual learning as seamlessly as we did. This alone prevented a tremendous amount of learning loss.

516 The E-rate program is extremely important for our school. Our school has saved a lot of funds due to the E-rate program.

517 It is a lonely island out here, and USAC expects us to explain the rules to them when I call the Client Service Bureau. The PIA reviewers and CSB personnel need extensive training. Bring back the annual onsite training and get rid of the virtual platform! EPC was a train wreck because the program was rushed, and the rules were unclear.

518 Without E-rate, we couldn't provide the level of service that we currently have--internet access, speed, reliability, etc.

519 Our consultant was a great help in understanding and applying for E-Rate. As a small, low funded school, E-Rate will ensure our students continue to have access to the internet.

520 I would like bear remittances to identify each month reimbursed, instead of a month range.

521 Would like to see funding available for servers.

522 I wish the process was easier to file and manage so I wouldn't have to hire a firm and pay them just to do it. Seems like a negative to cost money we're trying to save.

523 E-rate has been one program that has provide an upgrade to our old wiring and technology system. We are able to have all our students on the internet at one time without dropped connections. Suggestions: Please continue service to the companies that need it such as our company.

524 Our school greatly benefits from the E-rate program and its reimbursements. I work at a charter with only two campuses and am responsible for the E-rate program implementation. Since I also have many other job responsibilities, I rely on a consultant to help me through the process. Unfortunately, that means at least 10-20% of our reimbursement goes to the consultant for services. I find it very difficult to navigate the resources center and feel like I could do a better job if it was more user-friendly for someone whose sole job isn't E-rate.

525 Security is becoming a huge financial burdens to schools. Firewalls, etc... would help schools/libraries tremendously.

526 I could not acess the EPC and could not get the help I needed,

527 Thank you for your continued support.

528 Thank you for all your help.

529 The cost benefit and increased access is very good. The endless, tedious and nagging paperwork all the time makes me wonder if it's worth it. Honestly, it's bad. You should do something about it.

530 I am a first year principal. Better support in understanding technical matters would be appreciated.

531 As a small community we have limited vendors, so the bidding process is burdensome. We do appreciate the support from E-rate for our limited budget.

532 We would really like cybersecurity services and equipment to become E-rate eligible.

533 Cybersecurity funding through E-rate is imperative.

534 Cybersecurity solutions should be eligible. Since school districts and smaller organizations are typically targeted for ransomware attacks and we have limited budgets already, it would help us protect our students information and help maintain operations since it would prevent our network from going down.

535 I feel that the biggest impacting change the E-rate program could make to support all eligible organizations is to offer cybersecurity solutions and training. For libraries, it is assisting with hotspot services and devices for patrons.

536 Thank you for your service.

537 E-rate is vital to the qualifying organizations who otherwise have limited to no budget for technology with the ever increasing financial pressures of wages and inflation. The HUGE error in the erate process is the heavy technical requirements and hoops to file for funding including unwavering rules and punishment for minute mistakes in 470/ competitive bidding requirements such as mistakenly not filing for fiber maintenance when filing for dark fiber. There should be a weighted system where if there's 51% evidence of best effort competitive bidding then approve the project and move on. The current system requires costly erate consultant fees AND/ OR the risk of having your whole project get scrapped at the 11th hour by technicalities the, for the majority of the time, would make

little to no difference in the outcome of the project and bidding process. Yes you can appeal to the FCC/go through the appeals process etc.. but even that is not guaranteed and furthermore by the time a school district has been kicked through the PIA process they are frustrated, dont understand the appeals proccess (or both) and scrap the project including hours of their work. This is an incredible injustice and needs to be immediately addressed. Thank you for your consideration.

538 It would be great if the FCC would agree to support more multi-technology projects such as phones, cybersecurity, MFA, firewalls, along with necessary route/switch.

539 Your process is very difficult. I've been trying to apply for Cat 2 funding and are on my second request from you for additional information ... some of which was not relevant to the request. I've been applying in Category 1 for years. The process never gets simpler.

540 Despite trying to update and streamline the forms (with EPC), they are as confusing and laborious as ever. The entire firm should be viewable without filling all the blanks in, so you can see what information you need and can collect it all before filling in the form. I find myself answering one or two questions, then having to stop because I don't know the answer to the next question, then logging back in to answer another one or two questions, etc. Too time-consuming and frustrating! There are many libraries in our system who don't use E-rate because it's too hard to figure out - and no one has time to waste chasing all this stuff down. I've done this for 13 years and still end up calling USAC customer support every year for almost every form!

541 Thank you!

542 Just improve the connectivity and funding.

543 I appreciate the support.

544 All network services required to meet federal mandates should be E-rate eligible. For example; Firewalls and data protection measures.

545 Good service

546 It would be an amazing goal for E-rate to be a one stop shop for schools like ours where resources and knowledgable people are sparse.

547 Love the idea of a secondary Internet connection as a failover solution.

548 I hate the process! The time frame of getting bids and actual ability to start purchasing due to fiscal education start date causes issues with smaller vendors of equipment due to price changes. The review process is combursome. There should be error or suggestions when application are made not 6 months to a year later. Or more.

549 Just make the application process simpler! Don't have the time to drudge through the complicated process. The time it takes just about costs more than the rebate!

550 The E-rate program is vital to our schools success as it brings stable high speed connectivity to our school district which services a small rural community. Adding cyber security equipment and services to eligiable services would greatly help our district against cyber threats.

551 All technology expenses should be discounted. It would greatly help our current budget!

552 I want to reiterate that I do not believe having USAC/FCC manage the actual bidding process for goods and services would NOT be beneficial. Not sure if this is now a dead issue or not. Please do not make any changes to the current way that schools & libraries must bid. Bidding for the local school district/ library should still be per whatever local bidding rules are in place ONLY - along with the established days requirement by FCC/USAC.

Professional Standard of Conduct

Funds For Learning

Funds For Learning 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 Coduct and Code of Ethics, and adheres to a strict 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®, 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.

FUNDS FOR LEARNING
YOUR E-RATE GUIDES
www.FundsForLearning.com