

SUPPORTING STATEMENT

This submission is being made pursuant to 44 U.S.C. 3507 of the Paperwork Reduction Act of 1995 to obtain OMB approval to revise existing collection 3060-0806 as a result of a recent order as explained below.

A. Justification:

1. *Circumstances that make the collection necessary.* The Federal Communications Commission (Commission) seeks emergency processing under the Paperwork Reduction Act (PRA), 5 C.F.R. § 1320.13. The Commission is requesting OMB approval for this revised information collection by July 1, 2015.

The Communications Act of 1934, as amended by the Telecommunications Act of 1996 (Act), directed the Commission to take steps necessary to establish support mechanisms to ensure the delivery of affordable telecommunications service for all Americans, including consumers in high cost areas, low-income consumers, rural health care providers, and eligible schools and libraries. Section 254(h) of the Act, as implemented by the Commission in its *Universal Service Order* (CC Docket No. 96-45, FCC 97-157), established, *inter alia*, the federal universal service support mechanism for schools and libraries (E-rate program).

Under the E-rate program, eligible schools, school districts, libraries, and consortia that include eligible schools and libraries may apply for discounts ranging from 20 percent to 90 percent of the pre-discount price of eligible services. The level of discounts may change depending on the category of eligible services selected and are based on indicators of need.

Eligible school and library applicants can seek funding on an annual basis. They commence the application process by first seeking bids for eligible services and filing the FCC Form 470 with the Universal Service Administrative Company (USAC), the current administrator of the E-rate program. After entering into agreements for services, applicants may seek funding for such services by filing an FCC Form 471 application, once the application window opens.

On July 23, 2014, the Commission released an Order and FNPRM (WC Docket No. 13-184, FCC 14-99; 79 FR 49160, August 19, 2014) (*E-rate Modernization Order*) modernizing the E-rate program. Specifically, the *E-rate Modernization Order* adopted new rules and procedures to reorient the E-rate program to focus support on high-speed broadband for schools and libraries while also taking steps to streamline the program for the upcoming 2015 funding year, which runs from July 1, 2015 through June 30, 2016.

On December 19, 2014, the Commission released an Order and Order on Reconsideration (WC Docket No. 13-184, FCC 14-189; 80 FR 5961, February 4, 2015) (*Second E-rate Modernization Order*), which implements the next critical steps to modernize the E-rate program by maximizing options for schools and libraries seeking to purchase high-speed broadband and adjusting the E-rate spending cap to \$3.9 billion. With these improvements, the Commission seeks to close the high-speed connectivity gap between rural schools and libraries and their urban and suburban counterparts, and provide sufficient and certain funding for high-speed connectivity to and within all eligible schools and libraries.

Among other provisions, the *Second E-rate Modernization Order* takes further steps to improve the overall administration of the program and maximizes the options schools and libraries have for

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purchasing affordable high-speed broadband connectivity by:

- Directing USAC to make improvements and update its IT system to ease the administrative burden on applicants.
- Suspending the requirement that applicants seek funding for large up-front construction costs over several years, while, at the same time, allowing applicants to pay their share of one-time, up-front construction costs in installments negotiated with service providers.
- Equalizing the treatment of support for dark fiber with those seeking support for lit fiber which can be an especially cost-effective option for smaller, rural districts.
- Allowing schools and libraries to build high-speed broadband facilities themselves when it is the most cost-effective option, subject to a number of safeguards.
- Providing additional funding to match state funding for special construction charges to connect schools and libraries to high-speed broadband services that meet certain long term capacity targets.

The Commission seeks to revise OMB 3060-0806 to conform this information collection with changes implemented in the *Second E-Rate Modernization Order*.

Collection of the information on FCC Forms 470 and 471 is necessary so that the Commission and USAC have sufficient information to determine if entities are eligible for funding pursuant to the schools and libraries support mechanism, to determine if entities are complying with the Commission's rules, and to prevent waste, fraud, and abuse. In addition, the information is necessary for the Commission to evaluate the extent to which the E-rate program is meeting the statutory objectives specified in section 254(h) of the 1996 Act, and the Commission's own performance goals established in the *E-rate Modernization Order* and *Second E-rate Modernization Order*. This information collection, as described in more detail below, is being revised to modify the information collection requirements for the existing E-rate program, including changes to the FCC Form 470. While there are no changes to the FCC Form 471 at this time, the Commission directed USAC in the *Second E-rate Modernization Order* to improve the administrative experience for E-rate program participants in all facets of the program. Thus, while the FCC Form 470 is the first form to be revised under USAC's new and upgraded IT environment, all E-rate collections will undergo revisions to create an integrated online application and administrative process. Taken as a whole, these modifications should reduce administrative burdens and costs for applicants, service providers, and the E-rate program Administrator.

Statutory authority for this collection of information is contained in sections 1, 4(i), 4(j), 201-205, 214, 254, and 403 of the Communications Act of 1934, as amended, 47 U.S.C. § 151-154, 201-205, 218-220, 254, 303(r), 403 and 405.

a. Revision of FCC Form 470 "Description of Services Requested and Certification."

To begin the application process for E-rate funding, applicants must comply with the Commission's competitive rules. This starts when the applicant seeks bids from vendors by completing online an FCC Form 470 describing the services it needs. Once the information is entered into the online system and certified by the filer, the information is displayed on USAC's website where it must be posted for 28 days before applicants can enter into contracts or

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agreements for services. The funding year for the E-rate program starts on July 1 and ends on June 30. Many applicants must post the FCC Form 470 one year prior to the start of the upcoming funding year in order to meet state, local, and other procurement deadlines and requirements. For example, the 2016 funding year will begin July 1, 2016 which requires many applicants to post the FCC Form 470 on, or shortly after, July 1, 2015. Applicants and consultants completing the FCC Form 470 must provide basic information, including contact information and demographic information to assist in the processing of the application. At a minimum the applicant must include a list of specified services for which the school, library, or consortium requests bids, and sufficient information to enable bidders to reasonably determine the applicant's needs. See 47 C.F.R. § 54.503(c)(1). We propose to modify the FCC Form 470 as follows:

- Online Access for Streamlined Filing – Filers will now access the FCC Form 470 through an online portal. Applicants will be required to setup a user profile that will enable several components of the information collected online to be automatically populated when the user logs in, because the organization they are associated with is known based on the profile they completed.
 - Other than validation information (username, password, etc.) and the information required to establish user permissions (authorized users, level of permission of each, etc.) the E-rate portal will only require input of data that is already part of an approved information collection, either under this OMB control number or approved information collection requirements under another OMB control number, and will then “prepopulate” such information into the online FCC Form 470. This will prevent any duplication of data being collected. Thus, users will not have to enter common information, such as name, address, consultant, eligible entities, etc. but can have one user interface for managing such information.
- Integrated Instructions – Guidance for filling out the form will be integrated into the system to provide filers a roadmap to complete the FCC Form 470. Wherever applicable and possible, filers will be reminded that if they make certain selections during filing, they may have to provide additional information or meet special requirements. For example, the system would provide a reminder that when a filer is seeking bids for special construction associated with dark fiber solutions, it must also solicit bids to provide the service over lit fiber.
- Customized Certifications – Because some filers are (1) authorized to submit an FCC Form 470 and others are (2) authorized to submit an FCC Form 470 and order services on behalf of applicants (i.e., consultants), the online application will distinguish between these two categories and only present certifications that pertain to the particular classification of the filer.
- Registration Numbers – Filers will need to include their FCC Registration Number (FCCRN) on the FCC Form 470. This is the unique FCC identifier for the organization listed as Applicant (the online form will provide a lookup link for entities to locate their FCCRN). This is auto-generated by the system if it is already stored in the profile. This is a new requirement for the FCC Form 470 but applicants are required to include this information on the existing FCC Form 471.

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- Requesting Bids for Services – This is not a new requirement but there are updates to this section of the form where the filer must indicate their “Needs or Services Requested.” The filer is required to provide a description of any of the Category One (*e.g.*, telecommunications, voice or Internet access), or Category Two (Internal Connections, Basic Maintenance of Internal Connections, and Managed Internal Broadband Services) services sought. This is not new a requirement but to the extent that a filer seeks to take advantage of any of the new options schools and libraries have for purchasing affordable high-speed broadband connectivity afforded by the *Second E-rate Modernization Order*, revisions to the FCC Form 470 will allow users to indicate their intent to seek these services or arrangements. This includes indicating that they are seeking: (A) construction of network facilities that the applicant will own; (B) a dark-fiber lease, indefeasible right of use, or other dark-fiber service agreement or the modulating electronics necessary to light dark fiber; or (C) a multi-year installment payment agreement with the service provider for the non-discounted share of special construction costs.
 - Requests for Proposals – The requirement for the filer to indicate whether they are using an RFP is not new, however, users will now upload the RFP associated with the services sought on the particular line item. This allows the RFP to be “released” with the posting of the Form 470. The system will allow filers to associate an already uploaded RFP with other line items on the same form, thus reducing any confusion while avoiding the requirement to upload the RFP more than once.
 - Installment Payments for Special Construction – If the user wishes to seek an installment payment plan for its non-discounted portion of special construction charges (if applicable), the FCC Form 470 will contain a change that will allow the user to indicate this intent, the number of years desired for the installment plan (1- 4 years) and a preference for annual or monthly payments.
 - Receipt Notification Letter – Once a FCC Form 470 has been filed, filers will receive an email notice through the user portal to review the filing and submit allowable changes through the online system. Letters will no longer be mailed to applicants to confirm receipt of the FCC Form 470.
- b. Revision of FCC Form 470 “Description of Services Requested and Certification” Instructions: Separate FCC Form 470 instructions are being removed from this information collection. Instead, instructions, directions and other guidance for filers will be integrated into the online interface for the FCC Form 470 as described above.
- c. (No revisions in this submission) FCC Form 471 “Services Ordered and Certification.” Once a school or library has complied with the Commission’s competitive bidding requirements and entered into an agreement for eligible services, it must file an FCC Form 471 application to notify USAC of the services that have been ordered, the service providers with whom the applicant has entered into an agreement, and an estimate of the funds needed to cover the discounts to be given for eligible services. See 47 CFR § 54.504(a). Applicants also must provide their FCC Registration Number. See 47 CFR §§ 1.8002 and 1.8003. The funding window in which USAC accepts FCC Form 471 applications typically opens in January and closes in March before the funding year begins on July 1. For example, based on past filing window deadlines, the application funding year window for the 2016 funding year is likely to

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open in January 2016, and close in March 2016. This timing allows USAC to process applications and start committing funds prior to the start of the funding year.

New or revised rule impacting this collection: 54.503(c)(1)

- Revised **section 54.503(c)(1)(iii)** of the Commission’s rules requires an applicant to indicate their intent to seek the following services or arrangements, only if they intend to seek such services or arrangements: (A) construction of network facilities that the applicant will own; (B) a dark-fiber lease, indefeasible right of use, or other dark-fiber service agreement or the modulating electronics necessary to light dark fiber; or (C) a multi-year installment payment agreement with the service provider for the non-discounted share of special construction costs.
- Revised **section 54.503(c)(1)(iv)** requires that to the extent an applicant seeks bids for the construction of a broadband network that the applicant will own, the applicant must also solicit bids for both the services provided over third-party networks and construction of applicant-owned network facilities, in the same request for proposal;
- Revised **section 54.503(c)(1)(v)** requires that to the extent an applicant seeks bids for special construction associated with dark fiber or bids to lease and light dark fiber, the applicant must also solicit bids to provide the needed services over lit fiber;
- Revised **section 54.503(c)(1)(vi)** requires that to the extent an applicant seeks bids for equipment and maintenance costs associated with lighting dark fiber, the applicant must include these elements in the same FCC Form 470 as the dark fiber.

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

2. *Use of Information.* The requirements contained herein are necessary to implement the congressional mandate for universal service. The information collected herein provides the Commission and USAC with the necessary information to administer the E-rate program, determine the amount of support entities seeking funding are eligible to receive, to determine if entities are complying with the Commission’s rules, and to prevent waste, fraud, and abuse. The information will also allow the Commission to evaluate the extent to which the E-rate program is meeting the statutory objectives specified in section 254 of the 1996 Act, the Commission’s own performance goals set in the E-rate Modernization Order, and to evaluate the need and feasibility for any future revisions to program rules.
3. *Use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.* The filing process is being overhauled and modernized to provide a simple, web-based interface for submission of the FCC Forms 470 and 471. The online implementation of the FCC Form 470 will not, in non-material respects, exactly resemble the representation or template of the form we are providing with this submission. USAC will implement the revised information collection through an online interface on the USAC web site (online only filing). The system will permit applicants to be able to input data in required fields and have data auto-populated where applicable. To reduce applicant confusion, the electronic filing process will utilize progressive disclosure, so that an applicant will be asked to provide only information relevant to their application (e.g., school applicants will not be asked to provide, or see questions intended for, library applicants). The interface is being designed to provide online storage of applications and related materials for school and library entities, in order to ease compliance with recordkeeping requirements and possible audits. Furthermore, the system is being updated so that information

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already provided by applicants can be carried forward to filings in later funding years (i.e. pre-populated data), in order to further reduce the filing burden.

4. *Efforts to identify duplication.* There will be no duplication of information. The information sought is unique to each applicant and similar information is not already available. The Commission does not otherwise collect information from schools and libraries. The data collected by the Commission regarding school and library use of telecommunications, information and broadband services is, to the best of the Commission's knowledge, not available from other sources. To the extent data can be cross-walked based on unique identifiers; this information will be obtained and automatically pre-populated into the forms. The forms and information collection process for the E-rate program are being modernized to ensure that applicants need only report a single piece of information once, to the extent possible. The online system is also being modified to "pre-populate" information so that applicants do not have to manually re-enter information that has not changed from previous filings.
5. *Impact on small entities.* Entities directly subject to the requirements in the forms are primarily schools, libraries, school districts, and consortia comprised of schools and libraries. The information collections have been designed to impose the least possible burden on the respondents while ensuring that the Administrator and the Commission have information necessary to administer and improve the program. Smaller entities may avail themselves of the new opportunities presented by the *Second Modernization Order* and the changes to the online information collection to minimize potential burdens, such as:
 - Accessing the FCC Form 470 through an online portal where several components of the information collected will be generated automatically when the user logs in, because the associated organization is known based on the profile completed in the E-rate portal. The online portal will both streamline the application process and help small entities better manage and administer the information they provide to USAC;
 - The suspension of the requirement that applicants seek funding for large up front construction costs over several years;
 - Providing applicants the ability to pay their share of one-time, up-front construction costs over multiple years;
 - Equalizing the treatment of support for dark fiber with those seeking support for lit fiber which can be an especially cost-effective option for smaller, rural districts;
 - Allowing schools and libraries to build high-speed broadband facilities themselves when that is the most cost-effective option, subject to a number of safeguards; and
 - Providing additional funding to match state funding for special construction charges to connect schools and libraries to high-speed broadband services that meet certain long term capacity targets.
6. *Consequences if information not collected.* Failing to collect the information, or collecting it less frequently, would prevent the Commission from implementing section 254 of the 1996 Act, which in turn would prevent eligible schools and libraries from seeking bids on the FCC Form 470 and ultimately receiving discounted eligible services.
7. *Special circumstances.* Applicants are required to retain records filed with the administrator for ten years. The records are needed in the event the applicant is audited. If an applicant is audited, it should be able to demonstrate to the auditor how the entries in its application were provided. We do not foresee any special circumstances that would cause an information collection to be conducted under extraordinary circumstances.

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8. *Federal Register notice; efforts to consult with persons outside the Commission.* Emergency approval is being sought for this information collection, and the Commission seeks waiver of the 60-day notice requirement due to the emergency nature of this request under 5 CFR § 1320.8(d). However, the Commission has prepared and will publish a 30-day notice, announcing submission of this emergency request.

The Commission will conduct all the regular OMB clearance processes and procedures upon approval of the emergency request. We will publish the necessary notice(s) in the Federal Register when seeking regular OMB approval.

Prior to releasing the *E-rate Modernization Order* and *Second E-rate Modernization Order*, the Commission consulted with persons outside the agency to obtain their views on how to improve and modernize the E-rate program, including representatives of schools, school districts, and libraries, state education representatives, trade associations, service providers, and other stakeholders. The Commission worked with USAC to modify the information collection in a manner that will provide USAC and the Commission with necessary information, while limiting the burden on applicants to respond. Steps have been and are being taken to reduce the burden for future information collections by modernizing the online version of the FCC Forms 470 and 471.

9. *Payments or gifts to respondents.* There will be no payments or gift to respondents.
10. *Assurances of confidentiality.* There is no assurance of confidentiality provided to respondents concerning this information collection. However, respondents may request materials or information submitted to the Commission or to the Administrator be withheld from public inspection under 47 C.F.R. § 0.459 of the FCC's rules.
11. *Questions of a sensitive nature.* The request does not address any private matters of a sensitive nature.
12. *Estimates of the hour burden of the collection to respondents.* The following represents the hour burden on the collections of information:
- a. Submission of FCC Form 470 "Description of Service Requested and Certification."
Applicants in the E-rate program generally must submit an FCC Form 470 with a description of the services needed to USAC, which administers the fund. The information from the FCC Form 470 is then posted on USAC's website for all potential competing service providers to review. After waiting 28 days, the applicant can enter into an agreement for services. Applicants and consultants completing the FCC Form 470 must provide basic information on the form, including contact information and demographic information to assist in the processing of the application, as well as information on the services for which they are soliciting bids from service providers.
 - (1) Number of respondents: Of these approximately 35,000 public school districts, private schools, public library systems, and consortia respondents,
 - (a) Approximately 29,000 respondents are in the government/public sector; and
 - (b) Approximately 6,000 respondents are in the non-profit/private sector.

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- (2) Frequency of response: On occasion. Each applicant (may be a school district, multiple school districts, public library systems, or combination thereof) must submit the FCC Form 470, describing the services desired, to the Administrator before entering into an agreement for E-rate supported services.
- (3) Annual burden per response: 3 hours to fill out the form to comply with the reporting requirement; and 0.5 hour for the ten-year recordkeeping requirement. The total annual hour burden is: 122,500 hours.
- (4) Total estimate of in-house cost to respondents for the hour burdens for collection of information: \$6,001,275.
- (5) Explanation of calculation: We estimate that:
- (a) It will take approximately 3 hours to fill out Form 470 for the reporting requirement:
- 29,000 public sector respondents x 3 hours/form = 87,000 hours
- 6,000 private sector respondents x 3 hours/form = 18,000 hours
- (b) It will take approximately 0.5 hours for the ten-year recordkeeping requirement:
- 29,000 public sector respondents x 0.5 hours = 14,500 hours
- 6,000 private sector respondents x 0.5 hours = 3,000 hours
- (c) These 35,000 (public sector and private sector) respondents will require approximately 3.5 hours to comply with requirements: preparing Form 470, including time for reading instructions, and complying with the ten-year recordkeeping requirements at a cost of \$48.99 per hour (including administrative staff time): 35,000 respondents x 1 submission x \$48.99 per hour = \$6,001,275.

Summary of Estimated Total Annual Burden Hours for FCC Form 470:

Total Number of Respondents: 35,000 respondents: 29,000 public sector and 6,000 private sector

Total Number of Responses: 35,000 responses: 29,000 public sector and 6,000 private sector

Total Annual Hourly Burden: 122,500 hours

105,000 hours for reporting requirements

17,500 hours for recordkeeping requirements

b. Submission of FCC Form 471 “Services Ordered and Certification.”

The FCC Form 471 must be filed each year by all E-rate applicants. Once a school or library has complied with the Commission’s competitive bidding requirements and entered into an agreement for eligible services, it must file an application (FCC Form 471) to notify USAC of the services that have been ordered, the service providers with whom the applicant has entered into an agreement, and an estimate of the funds needed for eligible services. Besides basic information about the applicant or consultant filling out the form, the form also gathers information about the broadband services that the school or library is currently using to help the

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Commission and USAC determine the technological needs of participants in the E-rate program. Economically disadvantaged schools receive a greater share of E-rate program funding. Thus, the form contains a discount calculation worksheet for certifying the percentage of students eligible for the national school lunch program (or other acceptable indicators of economic disadvantage determined by the Commission) on a district-wide basis. Similarly, libraries must make certifications about students eligible for national school lunch programs in nearby areas. The FCC Form 471 requires applicant's demographic location because rural schools and libraries receive slightly more funding than urban participants. Entity-level information is required to determine school and library budgets for Category Two services and equipment.

- (1) Number of respondents: Of these approximately 47,000 public school districts, private schools, public library systems, and consortia respondents,
 - (a) Approximately 38,000 respondents are in the government/public sector; and
 - (b) Approximately 9,000 respondents are in the non-profit/private sector.
- (2) Frequency of response: Annually. Each school and library must submit FCC Form 471, describing the services desired, to the Administrator.
- (3) Annual burden per response: 4 hours to fill out the form to comply with the reporting requirement; and 0.5 hour for the ten-year recordkeeping requirement. The total annual hour burden is: 211,500 hours.
- (4) Total estimate of in-house cost to respondent for the hour burdens for collection of information: \$10,361,385.
- (5) Explanation of calculation: We estimate that:

(a) It will take approximately 4 hours to fill out Form 471 for the reporting requirement:

38,000 public sector respondents x 4 hours/form = 152,000 hours

9,000 private sector respondents x 4 hours/form = 36,000 hours

(b) It will take approximately 0.5 hours for the ten-year recordkeeping requirement:

38,000 public sector respondents x 0.5 hours = 19,000 hours

9,000 private sector respondents x 0.5 hours = 4,500 hours

These 47,000 (public sector and private sector) respondents will require approximately x 4.5 hours to comply with requirements: preparing Form 471, including time for reading instructions, and complying with the ten-year recordkeeping requirements at a cost of \$48.99 per hour (including administrative staff time):

47,000 respondents x 1 submission x \$48.99 per hour = \$10,361,385.

Summary of Estimated Total Annual Burden Hours for FCC Form 471:

Total Number of Respondents: 47,000 respondents: 38,000 public sector and 9,000 private sector

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Total Number of Responses: 47,000 responses: 38,000 public sector and 9,000 private sector

Total Annual Hourly Burden: 211,500

188,000 hours for reporting requirements

23,500 hours for recordkeeping requirements

Summary of Estimated Total Annual Burden Hours:

Total Number of Respondents: 82,000 respondents: 67,000 public sector and 15,000 private sector

Total Number of Responses: 82,000 responses: 67,000 public sector and 15,000 private sector

Total Annual Hourly Burden: 334,000 hours

293,000 hours for reporting requirements

41,000 hours for recordkeeping requirements

13. Total Annual Costs to Respondents:

(1) Total annualized capital/start-up costs: \$0.00.

The collections will not require the purchase of additional equipment.

(2) Total operation and maintenance and purchase of service component (O&M) costs: \$0.00.

The collections will not result in additional operation or maintenance expenses.

(3) Total annualized cost requested: \$0.00.

14. *Estimates of the cost burden to the Commission.* There will be few, if any additional costs to the Commission because notice, enforcement, and policy analysis associated with the Universal Service Fund are already part of the Commission's duties. Moreover, there will be minimal cost to the Federal government because a third party (USAC) administers the E-rate program.

15. *Program changes or adjustments.* The Commission determined that when considered in the aggregate, the revisions to FCC Form 470 result in de minimis changes in the burden hours for this information collection. Therefore, the burden hours for this information collection remain the same since they were last approved by OMB.

16. *Collections of information whose results will be published.* Non-proprietary information will likely be made publicly available for the benefit of all interested parties (*e.g.*, annual summary data for USAC's quarterly Universal Service Fund demand estimates). FCC Form 471 Item 21a-c requires detailed price and service information that will be publicly available unless a special showing can be made that there is a specific statute, rule or other restriction barring publication of the information provided in Item 21. The E-rate Modernization Order states that increased price transparency will improve cost-effectiveness within the program.

17. *Display of expiration date for OMB approval of information collection.* The Commission seeks continued approval to not display the expiration date for OMB approval of this information

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collection. The Commission will use an edition date in lieu of the OMB expiration date. This will prevent the Commission from having to repeatedly update the expiration date on the forms each time this collection is submitted to OMB for review and approval. The Commission publishes a list of all OMB-approved information collections in 47 C.F.R. § 0.408 of the Commission's rules.

18. Exceptions to certification statement for Paperwork Reduction Act Submissions (Item 19 of OMB Form 83i). There is one exception to the certification statement:
- (a) The Commission is seeking a waiver of the 60-day notice requirement under 5 C.F.R. § 1320.8(d). Due to the emergency nature of this request the Commission did not publish a 60-day notice. However, the Commission will publish a 30-day notice in the Federal Register soliciting public comment on the emergency approval request. The Commission has requested an approval date of July 1, 2015.

B. Collections of Information Employing Statistical Methods:

The Commission does not anticipate that the collection of information will employ statistical methods.