

**Universal Service – Schools and Libraries Universal Service Program,
FCC Forms 470 and 471**

Non- Public Draft – For Internal Use – Not for Filing Purposes

SUPPORTING STATEMENT

This submission is being made pursuant to 44 U.S.C. 3507 of the Paperwork Reduction Act of 1995 to obtain the Office of Management and Budget (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 processing under the Paperwork Reduction Act (PRA), 5 C.F.R. § 1320.13.

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.

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 implemented 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.

To ensure that the revised FCC Form 470 was available to E-rate applicants through a new online portal by July 1, 2015, the Commission sought and received emergency approval on June 22, 2015 from OMB for revisions to the FCC Form 470 under OMB 3060-0806 and approval for a rule change, 80 FR 37177, June 30, 2015. The

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Commission now seeks approval to revise OMB 3060-0806 to conform the FCC Form 471 to changes implemented in the *Second E-Rate Modernization Order*, including a change to one of the FCC Form 471 certifications. The Commission also seeks to extend the six-month emergency approval it received for the revision to FCC Form 470, without change.

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, specifically changes to the FCC Form 471. 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. FCC Form 470 was the first form to be revised under USAC's new and upgraded IT environment, but other E-rate information collections will undergo revisions to create an integrated online application and administrative process including OMB 3060-0856 and OMB 3060-0853. 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. (No revisions in this submission) 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 by completing online an FCC Form 470 describing the services it needs from vendors. 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 agreements for services. See 47 C.F.R. § 54.503(c)(4). The funding year for the E-rate program starts on July 1 and ends on June 30. 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).

b. (No revisions in this submission) FCC Form 470 “Description of Services Requested and Certification” Instructions:

Separate FCC Form 470 instructions were removed from this information collection and, instead, instructions, directions and other guidance for filers are integrated into the online interface for the FCC Form 470.

c. Revisions to the FCC Form 471 “Services Ordered and Certification.”

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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 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.

We propose to modify the FCC Form 471 as follows:

- Online Access for Streamlined Filing – Filers will access the FCC Form 471 through an online portal. The online portal will ask basic information about the applicant such as name, address, email address and website, and prepopulate these and other components of information already known about the applicant into the online FCC Form 471. This information will come from the applicant's FCC Form 470 filing and/or the information for the FCC Form 471 that has been previously stored in the system. Applicants will have the opportunity to pre-file information pertaining to the FCC Form 471 in the online portal prior to the opening of the FCC Form 471 funding year window. For example, filers will be able to input and certify discount calculation information ahead of the opening of the filing window as explained below. Also, once applicants have competitively bid their services and entered into contracts, they will be able to enter information about those contracts into the portal to be made part of their application. The portal may also ask other questions related to the FCC Form 471 and the certifications that the applicant will make when they file the FCC Form 471. For example, schools with endowments will be asked to provide the amount of their endowments to enable USAC to verify the certifications applicants make in the FCC Form 471 that they do not have endowments exceeding \$50 million. Access to the portal and pre-filing is expected to expedite the FCC Form 471 filing process when the funding year window opens for applicants to request E-rate funding for services. Once information is prepopulated into the FCC Form 471, applicants will be able to check and provide corrections and updates to the information displayed.
- Customized Applications - In general, the FCC Form 471 will have built-in logic to that adapts to the type of applicant and/or the type of selections made during the filing process. For example, if the filer indicates that it will be receiving state matching funds, fields will be available to that filer that will not be available to filers that are not receiving state matching funds.
- Integrated Instructions – Guidance for filling out the form will be integrated into the system to provide filers a roadmap to complete the FCC Form 471. Wherever applicable and possible, filers will be provided explanatory text regarding the selections they choose during filing, and additional text to remind them where they may have to provide additional information or meet special requirements.

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- Discount Calculations – Filers will be able to input, finalize and pre-certify the information necessary to calculate their discount rates prior to filing their FCC Form 471s. Pre-certifications will auto load into the FCC Form 471. Applicants that have not provided and pre-certified discount calculation inputs will need to provide such information before finalizing and submitting the FCC Form 471. In addition to information previously asked of applicants to compute discount calculations, applicants will need to provide other information to enable USAC and the Commission to better implement the directives of the *First E-rate Modernization Order* and the *Second E-rate Modernization Order* including information about annexes to buildings.
- Contract Upload – Once applicants have competitively bid their services and entered into contracts, they will be able to pre-file contract information and the actual contract into the system prior to filing their FCC Form 471s. In the section of the system that allows for contract uploads, applicants will be asked about other contract attributes, such as whether the contract can be used by other applicants (i.e. piggybacked).
- Requesting Services – In addition to information previously asked of applicants to request funding for services in this collection, applicants will need to supply information to enable USAC and the Commission to better implement the directives of the *First E-rate Modernization Order* and the *Second E-rate Modernization Order*. Applicants will be asked to provide the contract expiration dates for their current contract term as well as the date of contract expiration if all extensions were to be exercised. The form will be updated so that applicants can take advantage of the new options for purchasing affordable high-speed broadband connectivity. Revisions to the FCC Form 471 will allow:
 - Applicants to seek E-rate funding for certain dark fiber services, such as special construction beyond an applicant’s property line, that until the *Second E-rate Modernization Order* had only been eligible under the E-rate program for applicants purchasing lit fiber services.
 - Applicants to seek E-rate funding for construction of network facilities that the applicant will own.
 - Applicants seeking E-rate support for fiber special construction including dark, lit, and self-provisioned fiber projects will be asked to provide information about the construction of the network such as total distance and total cost of project. Applicants will also be able to request funding to refresh network equipment. Filers may be asked verification questions to ensure that they answered questions correctly.
- Installment Payments for Special Construction – The FCC Form 471 will allow an applicant to indicate it has entered into a multi-year installment payment agreement with a service provider for the non-discounted share of special construction costs and will seek information about the installment payment agreement such as the number of years (1- 4 years) covered by the plan and the amount of monthly payments. Applicants that enter into installment payment plans will need to make a certification about this according to a new rule revision:

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- o Applicants that enter into multi-year installment payment agreements must certify that they are able to make all required installment payments. *See* 47 C.F.R. § 54.504(a)(1)(iii).
 - State Matching Funds – Filers will indicate that they are receiving state or tribal government matching funds for special construction charges. Once filers indicate that they are receiving matching funds, the form will collect identifying information about the match such as the source and dollar amount of the match, expected speed of the connection, and the entities that are being connected by the special construction subject to the match. The system will adjust the discount calculation based on the amount of the matching funds up to 10 percent above an applicant’s discount rate.
 - Bid Responses - Unless they qualify for a FCC Form 470 bidding exemption, applicants will indicate the number of vendors who provided a responsive bid for the services or products for which support is being requested.
 - Other Clarifications – There are several questions in the FCC Form 471 that were reworded to help applicants better understand what information is being requested and to provide better data for the E-rate program. For example, the questions that ask about the current state of connectivity for schools and libraries have been restructured and are now asked on a per-entirety basis. This will provide better data about what services applicants might require to meet their needs. Answers to these questions do not affect funding commitments. Also, the questions applicants are asked to explain the purpose of their Category One services have been revised to help applicants to provide accurate answers.
 - Streamlined Communications – Once an FCC Form 471 has been filed, filers will receive a notice through the user portal to confirm receipt. Letters will no longer be mailed to applicants to confirm receipt of the FCC Form 471.
- d. Revision of FCC Form 471 “Description of Services Requested and Certification” Instructions: Separate FCC Form 471 instructions are being removed from this information collection. Instead, directions and guidance for filers will be integrated into the online FCC Form 471 experience.

New or revised rule impacting this collection: 54.504(a)(1)(iii):

- **Section 54.504(a)(1)(iii)** of the Commission’s rules relates to the certification that applicants make on the FCC Form 471 that they have the necessary resources to make effective use of the services they are purchasing. A revision to this rule adds a new component to the certification: Those applicants that enter into installment payment plans must certify that they are able to make all required installment payments.

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

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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.* USAC is implementing the revised information collection through an online interface on the USAC web site (online only filing). The online implementation of the FCC Form 471 will not, in non-material respects, exactly resemble the representation or template of the form we are providing with this submission. The online portal 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 where possible, 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, with the potential to ease compliance with recordkeeping requirements and possible audits. Furthermore, the system is being updated so that where possible, information 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 online system is 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 form are primarily schools, libraries, school districts, and consortia comprised of schools and libraries. This information collection is 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 E-rate 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 471 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;
 - Use the new simplified application process for seeking funding for services under multi-year contracts;
 - 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

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- 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 or tribal 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, and prevent eligible schools and libraries from seeking E-rate discounts for eligible services.
 7. *Special circumstances.* We do not foresee any special circumstances that would cause an information collection to be conducted under extraordinary circumstances.
 8. *Federal Register notice; efforts to consult with persons outside the Commission.* The Commission published a notice pursuant to 5 CFR Section 1320.8(d), in the Federal Register to solicit public comment on the revised collection, 80 FR 48102, August 11, 2015. No comments were received.

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 Form 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."
 - (1) Number of respondents: Of these approximately 25,000 public school districts, private schools, public library systems, and consortia respondents,
 - (a) Approximately 20,000 respondents are in the government/public sector; and
 - (b) Approximately 5,000 respondents are in the non-profit/private sector.

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- (2) Frequency of response: Annually and on occasion. In order to start the competitive bidding process, 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 1.4 Forms 470 for the reporting requirement:
- 20,000 government/public sector respondents x 3 hours x 1.4 forms = 84,000 hours
- 5,000 non-profit/private sector respondents x 3 hours x 1.4 form = 21,000 hours
- (b) It will take approximately 0.5 hours for the ten-year recordkeeping requirement:
- 20,000 government/public sector respondents x 0.5 hours x 1.4 forms = 14,000 hours
- 5,000 non-profit/private sector respondents x 0.5 hours x 1.4 forms = 3,500 hours
- (c) These 25,000 (government/public sector and non-profit/private sector) respondents will require approximately 3.5 hours to comply with requirements: preparing 1.4 Forms 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 responses x 3.5 hours x \$48.99 per hour = \$6,001,275.

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

Total Number of Respondents: 25,000 respondents: 20,000 government/public sector and 5,000 non-profit/private sector

Total Number of Responses: 35,000 responses: 20,000 government/public sector and 5,000 non-profit/private sector x 1.4 response

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.”

- (1) Number of respondents: Of these approximately 27,700 public school districts, private schools, public library systems, and consortia respondents,
- (a) Approximately 22,000 respondents are in the government/public sector; and

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- (b) Approximately 5,700 respondents are in the non-profit/private sector.
- (2) Frequency of response: Annually and on occasion. In order to seek funding for competitively bid and ordered services, 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: 211,905 hours.
- (4) Total estimate of in-house cost to respondent for the hour burdens for collection of information: \$10,381,225.
- (5) Explanation of calculation: We estimate that:

(a) It will take approximately 4 hours to fill out 1.7 Form 471 for the reporting requirement:

22,000 government/public sector respondents x 4 hours x 1.7 form = 149,600 hours

5,700 non-profit/private sector respondents x 4 hours x 1.7 form = 38,760 hours

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

22,000 government/public sector respondents x 0.5 hours x 1.7 form = 18,700 hours

5,700 non-profit/private sector respondents x 0.5 hours x 1.7 form = 4,845 hours

These 27,700 (government/public sector and non-profit/private sector) respondents will require approximately x 4.5 hours to comply with requirements: preparing 1.7 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):

47,090 responses x 4.5 hours x \$48.99 per hour = \$10,381,225.

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

Total Number of Respondents: 27,700 respondents: 22,000 government/public sector and 5,700 non-profit/private sector

Total Number of Responses: 47,090 responses: 22,000 government/public sector and 5,700 non-profit/private sector/1.7 form

Total Annual Hourly Burden: 211,905

188,360 hours for reporting requirements

23,545 hours for recordkeeping requirements

Summary of Estimated Total Annual Burden Hours:

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Total Number of Respondents: 52,700 respondents: 42,000 government/public sector and 10,700 non-profit/private sector

Total Number of Responses: 82,090 responses: 65,400 government/public sector and 16,690 non-profit/private sector

Total Annual Hourly Burden: 334,405 hours

293,360 hours for reporting requirements

41,045 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.* In this submission, the total number of respondents decreased by 29,300, the total number of responses increased by 90, and the total burden hours increased by 405. These changes were the result of using actual Form 470 and 471 data provided by USAC, as opposed to using estimated numbers. According to the actual data, an applicant files 1.4 forms for the Form 470 and 1.7 forms for the 471. The Commission determined that when considered in the aggregate, implementing program changes through revisions to FCC Form 471 at the same time the application filing process is being streamlined through the online portal result in de minimis changes in the burden hours for this information collection.

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 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 this information. 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 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.

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18. Exceptions to certification statement for Paperwork Reduction Act Submissions.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods:

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