

**Before the
Federal Communications Commission and the
Office of Management and Budget**

In The Matter of	)	
	)	
Information Collection Being Submitted for	)	
Review and Approval to Office of Management	)	
And Budget by the Federal Communications	)	OMB 3060–1323
Commission; Notice and Request for Comments	)	FR ID 300100, 90 FR 26814
	)	
Schools and Libraries Cybersecurity Pilot Program	)	Corrected Notice
Form Numbers: FCC Forms 470, 471, 472, 474-	)	FR ID 300735, 90 FR 19009
Cybersecurity, 484 and 488 – Cybersecurity	)	
	)	
Addition of Part 3 to FCC Form 484 and	)	
Modifications to FCC Form 471	)	

**Comments of the State E-Rate Coordinators’ Alliance to Information Collection for
Schools and Libraries Cybersecurity Pilot Program**

I. Introduction and Summary

The State E-Rate Coordinator’s Alliance (“SECA”)¹ submits the following comments to the Office of Management and Budget (“OMB” and to the Federal Communications Commission (“FCC”) regarding the Information Collection of the above-referenced Schools and Libraries Cybersecurity Pilot Program (“CPP” or “Pilot”) forms. Specifically, the proposed revisions add a new section to FCC Form 484, for annual reporting by CPP participants, and proposed revisions to the information fields collected on the CPP FCC Form 471.

¹ SECA members provide E-rate coordination services in 42 states and two U.S. Territories. State Coordinators have daily interactions with and provide training to E-rate applicants to assist them with all aspects of the program. State coordinators serve as intermediaries between the applicant and service provider communities, the E-rate Administrator, and the Federal Communications Commission. SECA regularly communicates with the E-rate program administrator, the Federal Communications Commission) and other federal and state policy makers regarding the operation and administration of the E-rate program to convey recommendations and feedback to fulfill the goals of the program. The organization was established in 1997 and is operated by a dedicated team of volunteers.

SECA members are knowledgeable about the challenges and confusion applicants face when completing the E-Rate version of FCC Form 471. SECA members also received and answered questions about how to complete Part 1 and 2 of FCC Form 484, which serve as the basis for the proposed Part 3 of FCC Form 484.

These Comments focus on the areas of inquiry stated in the Federal Register Notice:

Comments are requested concerning: (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information shall have practical utility; (b) the accuracy of the Commission's burden estimates; (c) ways to enhance the quality, utility, and clarity of the information collected; and (d) ways to minimize the burden of the collection of information on the respondents, including the use of automated collection techniques or other forms of information technology. Pursuant to the Small Business Paperwork Relief Act of 2002, Public Law 107-198, see 44 U.S.C. 3506(c)(4), the FCC seeks specific comment on how it might “further reduce the information collection burden for small business concerns with fewer than 25 employees.”²

The Comments are summarized as follows:

FCC Form 484:

- Part 3 should be pre-populated with the information from Part 2 of FCC Form 484.
- Part 3 should incorporate drop down menus and use the same drop down menus as Part 2, whenever possible.
- Eliminate Responding Person Information Fields because they are unnecessary and confusing.
- Examples of supporting documentation to be uploaded should be provided.
- Detailed instructions including online form screen shots and explanatory text should be published in a Part 3 User Guide.
- Part 3 submissions should be confidential, consistent with the treatment of Part 1 and Part 2 submissions.
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FCC Form 471:

- Tax Fields should include Taxes and Surcharges.
- The Form 471 User Guide should be updated to reflect the revised information fields.
- Publicly available data on FCC Form 471 should remove any sensitive details that may reveal potential cybersecurity vulnerabilities.

² 90 FR 2009, FR 300735 (July 2, 2025)

II. FCC Form 484, Part 3 Comments

A. Background and Purpose of Part 3 of FCC Form 484.

Part 3 of FCC Form 484 (“Part 3”) requires CPP participants to provide annual updates on the progress of implementing the cybersecurity pilot plan that was submitted in Part 2 of FCC Form 484. CPP is a three-year pilot program that begins for each participant when they receive funding approval and ends three years after that date.

Part 1 of FCC Form 484 (“Part 1”) was the form that all schools, libraries and consortia had to complete, to request to be selected to participate in CPP. Those applicants that were selected to participate in CPP (“Participant”) are required to undergo the competitive bidding process, submit FCC Form 471 to itemize and quantify the costs of the requested services and equipment, and complete Part 2 of FCC Form 484 (“Part 2”). Part 2 requires more detailed information about each respective participant’s cybersecurity past experiences and future plans. Specifically, participants are asked to explain the history of their cybersecurity experiences, and how the CPP funding will improve the security of their networks against future threats. All participants must submit Part 2 before they may receive approval for CPP funding.

CPP applicants were notified that, if selected to participate, they would be required to submit annual reports to update their cybersecurity past experiences and future plans. This is the purpose of Part 3 and is the information collection currently under review.

B. Part 3 Should Be Pre-Populated with the Information From Part 2 of FCC Form 484.

When the CPP participant starts to draft Part 3 of FCC Form 484, the information from its Part 2 of FCC Form 484 should be imported into the draft form as editable fields. Since Part 3 is intended to be an update to the information in Part 2, this is a logical and efficient way to minimize the burden of this information collection on the CPP participants. There are numerous fields that seek to collect the same information in Part 2 and Part 3. Part 3 is expected to update the information submitted in Part 2.

Importing the information from Part 2 will enable the participant to more efficiently complete its Part 3 form, rather than requiring each participant to have to separately retrieve a PDF of the Part 2 form or open the Part 2 form in another browser window and cut and paste the information from the Part 2 form into the Part 3 form. This is especially useful and necessary because the online filing platform does not work well when a filed form (such as Part 2) is opened at the same time that a new form (Part 3) is being drafted. It is confusing and technically difficult to navigate between a submitted form and a new form that is in the process of being drafted.

This recommendation would leverage information technology to reduce the burden of the information collection of Part 3 on the CPP participants. It also will promote the quality of the information collection by enabling participants to tie together more cohesively the information submitted previously in Part 2 to the updated information provided in Part 3.

C. Drop Down Menu Options Should Be Incorporated into the Form Whenever Possible.

Part 2 of FCC Form 484 utilizes drop down menus for numerous data fields, which are very helpful for CPP participants to utilize. It also helps standardize the collection of information which may increase the practical utility of the information. SECA encourages OMB and FCC to ensure that information fields common to both Part 2 and Part 3 incorporate the same drop down menus. That is, if an information field in Part 2 uses a drop down menu, and the same information field is going to be in Part 3, the same drop down menu options from Part 2 should be included in Part 3, to the extent possible. Several areas on the online form that will be common to Part 2 and 3 and that use a drop down menu selection are:

Part 2 Field #	Online Part 2 Section and Description	Part 3 Field #
33	Correction of Known Security Flaws and Routine Backups Section 1.1 – uses drop down menu for Subsections b, c, d	43
34	Recommended Cybersecurity Best Practices Section 2.1 – uses drop down menu for Subsections, a, b, c,	44
39	Non-monetary Challenges Section 6.1 – uses drop down menu for Subsections a, b	49
40	Current Cybersecurity Measures Section 3.1 – uses drop down menu for Subsections a, b, c, d	50
41	Cybersecurity Training Section 5.1 – uses drop down menu for Subsections a, b	51
46	Cybersecurity Protections for Broadband Networks and Data Outside of the Pilot Program Section 2.2 – Subsection a uses drop down menu	62

By aligning the information and presentation of Part 2 and Part 3 to the extent possible, participants will be better able to accurately complete the forms, and the quality of the reported information will be more useful for analysis.

D. “Responding Person” Fields 13 – 19 are Redundant, Confusing and Unnecessary.

Part 3 includes new fields for “Responding Person” if different from the Contact Person and/or the person authorized to make all required certifications and provide all required signatures (Authorized Person).” The definition of the Responding Person is not provided and is unclear. The Responding Person is usually the Contact Person who is already required to be identified on the form. The proposed information collection already collects information about consultants and also requires the lead consortium member to be the applicant. Consequently, this additional information is either redundant and/or confusing. Further, regardless of who completes the form, the certifier of the form is responsible for authenticating all the information in the form. The certification in Field 76 states: “that based on information known to me or provided to me by employees responsible for the data being submitted, I hereby certify that the data set forth in this form has been examined and is true, accurate, and complete.” The Responding Person fields 13 – 19 are unnecessary, confusing and should be omitted from the final version of the form.

E. Examples of Supporting Documentation to be Uploaded Should Be Provided.

The User Guide to Part 2 states, “Use this page to upload any documentation that is requested or required by the application or will help us understand your Pilot project or the cybersecurity services and equipment you propose to use.” Participants do not really understand what they are supposed to upload here. Additional clarification is essential to enable participants to meaningfully prepare the submission of their Part 3 and to minimize the burden of this information and to increase the utility of the collected information.

F. A Detailed User Guide for Part 3 Is Essential.

Under the direction of the FCC, the CPP administrator, USAC, prepared a User Guide for Part 2. See [FCC Form 484 Part 2 User Guide](https://www.usac.org/e-rate/cybersecurity-pilot-program/) (at <https://www.usac.org/e-rate/cybersecurity-pilot-program/>). It is essential that a similar guide, with more detailed information, be published and circulated for Part 3, to provide clear instructions to the participants of how to complete the form. The User Guide takes the place of instructions, which are no longer published or subject to review via the Paperwork Reduction Act.

The FCC explained the purpose of Part 3 as follows:

The information collection also collects periodic data reporting and certifications from Pilot participants to evaluate performance goals and the success of the Cybersecurity Pilot Program. Additionally, the information collected helps assess the costs and

benefits of utilizing universal service funds to support the cybersecurity needs of schools and libraries.³

Achievement of these goals is wholly dependent upon the accuracy and reliability of the information reported by the CPP participants, which can only be realized by making available detailed instructions. The User Guide should be required to contain screen shots of the online form and describe the requested information beyond the field names and descriptions in the Paperwork Reduction Act submission to OMB.

Without providing this instructive guidance to participants, the collected data will be inherently less reliable for qualitative and quantitative analyses and will undermine the achievement of these goals. Equally as concerning, participants will experience a greater burden in responding to this information collection because of potential confusion and additional time needed to ask clarifying questions and to gather the information necessary for submitting responses to the form.

G. Part 3 Submissions Should Be Confidential, Consistent with the Treatment of Part 1 and Part 2 Submissions.

The FCC has already clarified in an FAQ that Parts 1 and 2 of FCC Form 484 will be confidential because of the sensitive nature of the information being submitted. They stated:

In short, due to the sensitive nature of the cybersecurity-related information collected on Parts 1 and 2 of the FCC Form 484, the FCC will treat the information collected as presumptively confidential under its rules and withhold it from routine public inspection. The FCC also will not share the information collected on the form with other federal agencies for incident reporting or compliance purposes.

SECA requests that the confidential treatment should be extended to Part 3 submissions for the same reasons.

³ FCC Supporting Statement for Information Collection 3060-1323 (June 2025); <https://www.reginfo.gov/public/do/DownloadDocument?objectID=159221300>

III. Revisions to FCC Form 471

A. Tax Fields Should Include Taxes and Surcharges.

There are several fields proposed to be added to FCC Form 471 for Taxes, such as Fields 69, 76, and 87. These fields should be labeled “Taxes and Surcharges” consistent with the definitions used in the E-Rate program to delineate between base charges (such as monthly recurring service charges or one-time equipment or non-recurring charges) and other fees. The E-Rate program uses the following definition adopted by the FCC, and this same definition should be used in the CPP:

Taxes, surcharges, and other similar, reasonable charges incurred in obtaining an eligible product or service are eligible. These types of charges include customer charges for universal service fees, but do not include additional charges for universal service administration.

This language tracks with boilerplate language in many commercial contracts and the definition should be incorporated within the CPP Form 471 data fields.

B. The Form 471 User Guide Should be Updated to Reflect the Updated Information Fields.

The revisions to the CPP Form 471 that are ultimately approved by OMB should be incorporated in a revised CPP Form 471 user guide to assist participants when they attempt to file their forms. The User Guide serves the place of instructions for filing the form and needs to be consistent with the information fields that appear in the online version of the form.

C. Publicly Available Data on FCC Form 471 Should Remove Any Sensitive Details That May Reveal Potential Cybersecurity Vulnerabilities.

The FCC’s Supporting Statement mentions that the agency may publish funding request (FCC Form 471 - Cybersecurity) and funding disbursement (FCC Forms 472/474 - Cybersecurity) data. SECA encourages the FCC to continue to be sensitive to the needs of preserving the confidentiality of any information that could enable saboteurs to exploit network vulnerabilities and increase cyberattacks. In particular, SECA encourages the FCC to refrain from publishing the narrative descriptions in support of funding requests because those descriptions may inadvertently disclose network weaknesses or gaps that the requested service and/or equipment are intended to resolve. The other information about each funding request, such as the category of service/equipment and the make and model of the equipment and service, may be disclosed publicly without raising the same level of concern.

IV. Conclusion

The State E-Rate Coordinators' Alliance appreciates the opportunity to submit these comments on the proposed forms and respectfully requests that the Office of Management and Budget and the Federal Communications Commission incorporate these proposed revisions and other related recommendations within the final, approved version of Part 3 of FCC Form 484, the revisions to the CPP FCC Form 471 and the implementation of these information collections.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Rachel K. Schemelin". The signature is fluid and cursive, with a large initial "R" and "K".

Rachel Schemelin, Chair
State E-Rate Coordinators' Alliance

Dated: August 1, 2025

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