



June 21, 2019

The Honorable Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Submission on FY 2019 Form 470 Internet Access Service Item Drop Down Options Modernizing the E-rate Program for Schools and Libraries -- WC Docket No. 13-184

Dear Ms. Dortch:

The Schools, Health & Libraries Broadband Coalition (“SHLB”) supports the May 7, 2019 *ex parte* filing by Funds for Learning¹ (“FFL”), in which FFL reported that nearly 700 applicants have approximately \$24M of E-rate funding at risk due to ongoing applicant confusion regarding the Internet service drop down options on their 2019 FCC Form 470 applications. SHLB also supports the State E-rate Coordinators Alliance’s (“SECA”) May 30, 2019 filing regarding this same issue.²

In FY 2018, USAC made unvetted changes to the FCC Form 470 drop down options for Internet access. These changes created a significant amount of confusion for both applicants and service providers. Those concerns led SHLB and other stakeholder groups to seek relief from the Commission for affected FY 2018 E-rate applicants. The FCC granted that relief in a joint letter from the Wireline Competition Bureau and Managing Director’s Office on May 1, 2018. Specifically, the Bureau directed USAC to implement modifications to the FY 2019 FCC Form 470 to avoid future confusion and concerns. Unfortunately, the modest modifications that were made to the FY 2019 Form 470 did not alleviate the confusion, which could have been easily rectified had USAC considered the previously filed comments and conferred with the E-rate stakeholder community.

SHLB members support the initiative taken by FFL to request relief for FY 2019 E-rate applicants who may have misfiled their FCC Form 470 Internet access applications. We also

¹ <https://www.fcc.gov/ecfs/filing/10507490409811>

² <https://ecfsapi.fcc.gov/file/1052914798846/ESL%20Recommendations%20Ex%20Parte%205-29-2019.pdf>

support the request to proactively grant relief for FY 2020 applicants, because the same format and Internet service choices will be used on the FY 2020 FCC Form 470. SHLB also supports SECA's request that the Commission direct USAC to immediately work with interested stakeholders to develop new, plain-language Form 470 drop down choices for FY 2021 in a collaborative manner, so they can be approved by the Commission and made available as of July 1, 2020 in the EPC portal.

Sincerely,

A handwritten signature in black ink that reads "John Windhausen, Jr." with a stylized flourish at the end.

John Windhausen, Jr.
Executive Director
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