

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Promoting Fair and Open Competitive)	WC Docket No. 21-455
Bidding in the E-Rate Program)	
)	
)	
)	

MOTION FOR EXTENSION OF TIME

The State E-Rate Coordinators’ Alliance joins with the undersigned twenty-six (26) E-rate stakeholder organizations (collectively referred to as the “Joint Petitioners”) to respectfully request a 30-day extension of the comment deadline and a 30-day extension of the reply comment deadline in the above-captioned matter.¹ An extension, if granted, would move the comment date to April 27, 2022 and reply comment date to May 27, 2022. In accordance with 47 C.F.R. §1.46 this motion is timely because it is submitted “at least 7 days before the filing date.”

In the NPRM, the Commission noted, “Implementation of a competitive bidding portal would require significant development and implementation resources, from the Commission, USAC, and E-Rate stakeholders.”² Proposals in the NPRM could radically change and potentially conflict with existing state or local procurement regulations. Stakeholders require adequate time to examine, evaluate and respond to Commission questions posed in the proceeding. An extension will significantly improve the record for Commission consideration.

¹ *In the Matter of Promoting Fair and Open Competitive Bidding in the E-Rate Program*, WC Docket No 21-455, Notice of Proposed Rulemaking (rel. December 16, 2021). The 27 signatories to this Motion include public interest organizations, applicant representative organizations, state government agencies and departments, consulting organizations that specialize in assisting applicants, and other consulting firms that focus on supporting service providers.

² *Id.* at ¶ 33.

ARGUMENT

Present circumstances provide good cause for the Commission to authorize the proposed extension and granting this request is consistent with past precedent.³ The NPRM was published in the Federal Register on January 27, 2022 with initial comments due on March 28, 2022. This period coincides and overlaps with the 2022 E-Rate filing window which opened on January 12, 2022 and closes at 11:59 p.m. on March 22, 2022. All E-Rate stakeholders devote considerable time and resources to E-Rate bid preparation, Form 470 posting, bid responses, bid evaluation and Form 471 filing during the filing window. Precious little time is available to address NPRM issues during the filing window. An extension will provide sufficient time for parties to analyze the myriad of issues and questions raised in the NPRM, and meaningfully address them in their comments.

Given the current deadlines and their overlap with the E-Rate filing window, by granting this extension the Commission will ensure commenters have an opportunity to fully participate and develop well-reasoned and factually supported positions in response to the NPRM questions. Given the novel and complex nature of proposals in the NPRM, and the nationwide impact they would have on school, library and consortia broadband, internet and networking equipment procurements, the Commission should ensure that it has the best possible record, which can only be achieved by granting this extension request.

Further, the Commission's current competitive bidding rules and requirements, as well as existing state and local procurement requirements, are in place and will continue to be in effect while the NPRM is pending. Consequently, there is no urgent need for the Commission to insist on adhering to the current deadlines in this proceeding and undermine the development of a robust record on which to base its final decisions. The public interest is served by granting the extension and ensuring the

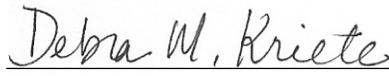
³ See, e.g., *Report on the Future of the Universal Service Fund*, WC Docket No. 21-476, Order Granting Extension of Time, DA 22-6 (released January 4, 2022).

development of a complete record in this proceeding to enable the Commission to promulgate final rules that consider the full input of all E-rate stakeholders who wish to participate in the NPRM proceeding.

For these reasons, the Joint Petitioners submit that good cause exists for the Commission to grant this extension request, and the public interest will be served by the extension. The additional 30-days for preparing initial and reply comments will enable all interested parties to have sufficient opportunity to research, collaborate, evaluate and respond thoughtfully to NPRM questions, which in turn will benefit the Commission in its deliberations concerning the pending proposals.

Respectfully submitted,

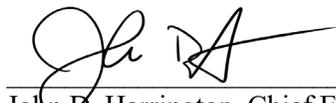
State E-rate Coordinators' Alliance (SECA)


Debra M. Kriete, Chairperson

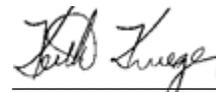
Schools, Health & Libraries Broadband Coalition (SHLB)


John Windhausen, Executive Director

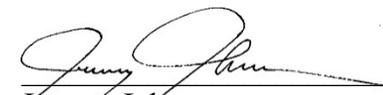
Funds for Learning, LLC (FFL)


John D. Harrington, Chief Executive Officer

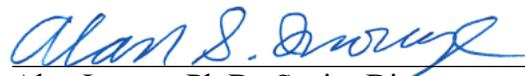
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Keith Krueger, CAE, CEO

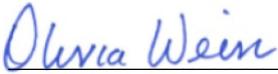
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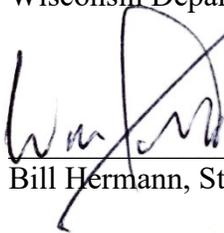
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Luis Alejandro Wong



Chief Executive Officer

Kentucky Department of Education



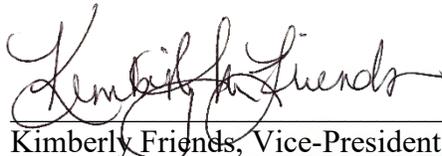
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E-rate Management Professional Association (E-mpa®)



President, CPA, CEMP

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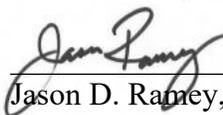
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E-rate Central, Inc.



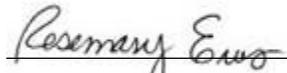
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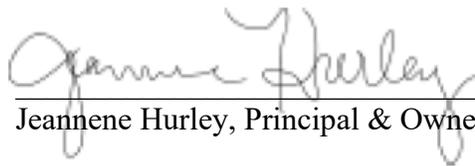
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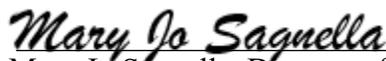
Sound E-rate


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Educational Professional Services


Teri Lawrence, CEO

E-rate Online, Inc.


Mary Jo Sagnella, Director of Operations

E-Rate & Educational Services


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