**E-Rate Funding—Guaranteed**

# Introduction to the Form 470

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## Introduction

On-Tech is a technology consulting firm focused on managing the E-Rate process for schools and libraries.  We provide a full range of E-Rate services for applicants, including: handling the entire application process; consulting on construction projects to ensure maximum E-Rate funding; and reviewing proposals to ensure E-Rate compliance.  In addition, On-Tech obtains E-Rate funding for school and library construction projects.  On-Tech is not associated with any service provider.

Dan Riordan has been involved with the E-Rate since 1997, when he was trained by the New Jersey Department of Education to offer assistance to school districts in completing the application. Since then, he has worked on the E-Rate as a trainer, a district technology coordinator, and now a consultant.

# Who

The Form 470 must be filed by the billed entity. The services listed on the Form 470 must be delivered to eligible entities. Sometimes they are the same, sometimes not. It is important at the outset to determine what role(s) your library plays.

## Billed Entity

You must decide: Is your library a billed entity? It really is a matter of who pays the bills. Does the library have its own budget? Is the library's name on the bills from vendors? Does the library cut its own checks?

In some cases, services are purchased by the municipality or other entity on behalf of the library. In that case, the entity that purchases the services must file the Form 470. That will be a consortium application, with the municipality as "lead agency." No actual consortium needs to be formed, but the eligible entities must prepare a Letter of Authorization (LOA) for the lead agency (or their consultant).

In some cases, services are purchased through an actual consortium, like the Marmot Library Network. In that case, the consortium members must give an LOA to Marmot, and Marmot must file the Form 470.

For single libraries, the main library will be both billed entity and eligible entity. For a library system, the main library will be both billed entity and eligible entity, and the branches will be included as eligible entities.

In some cases, you will need to file two Form 470s. For example, if the library has its own phone service, but shares Internet access with the town, then you will need to file a Form 470 for phone service with the library as the billed entity, and a second Form 470 for Internet access with the town as the billed entity.

## Eligible Entity

For libraries, an eligible entity is a location which has public areas. Administrative buildings can also be eligible for Priority One services (telecommunications and Internet access). On the Form 470, you will not identify individual locations, only the number for which you are filing.

## Contact

Who should you show as a contact? The question is, who wants the bid responses and subsequent spam for years to come. For libraries in Group A, Dan Riordan will be the contact. For libraries in Group B, consider creating a separate email address for the form, so that you can discard the address after the bidding period is over. On-Tech can create a disposable email address for you.

**Caution:** A service provider cannot be involved in the preparation or certification of the entity's Form 470.  If a service provider employee is listed as the contact, all funding based on that Form 470 will be denied.

## Consultant

If a consultant helps with your application, you should list the consultant on your form.  This is a two-step process:

1. Enter a Consultant Registration Number (CRN), then click "Search" to identify the consulting company.  On-Tech's is 16043646.
2. From the drop-down that appears, select the individual who is helping you.  In this case, please select Dan Riordan from the list.

# What

The Form 470 is a nickname for the Description of Services Requested and Certification Form.

## Description of Services

The main purpose of the Form 470 is to describe the services for which you may seek E-Rate funding.  A few things to keep in mind when describing services:

1. Be specific enough for bidders to submit a meaningful bid.  If you have more than will fit in the space provided, then create a separate sheet of specifications, and indicate on the form that you have an RFP.
2. Do not submit an encyclopedic list of every eligible service.  List only services which you might actually purchase.
3. Do not submit an exact copy of someone else's Form 470.  It makes sense to use other forms as an example, but if your form is identical to a few others, USAC might launch an investigation looking for other connections between the applications.
4. Don't include make and model in your description, unless you add "or equivalent."

**Examples**

|      | **Service**                              | **Quantity and/or Capacity**                    |
| ---- | ---------------------------------------- | ----------------------------------------------- |
| Bad  | Phones                                   | 27                                              |
| Good | Local and long distance telephone service | 27 lines                                       |
| Bad  | WAN service                              | Entire library system                           |
| Good | Digital transmission service             | 1 Gbps circuits for 7 locations                 |
| Bad  | Internet                                 | 1 location                                      |
| Good | Internet access                          | 1 connection @ 10 Mbps, including circuit       |

## Certifications

You will make the following certifications:

1. Schools or libraries are included in the application.
2. We have a tech plan (or no tech plan is required). A tech plan is not required for any Priority One services (telecommunications and Internet access). If you plan to file for equipment or maintenance, you must have a tech plan that lasts until at least June 2013.
3. I accept bids for 28 days and then select the most cost-effective vendor.
4. I will keep all documents for 5 years.
5. I won't resell these services.
6. Our library will have the resources (funding, tech support) to use these services.
7. I'm authorized to submit this form on behalf of my library.
8. I have read and am complying with all FCC rules.
9. I understand people convicted of criminal activities related to the E-Rate may be forbidden to participate in the program for a while.

# When

Technically, there is no deadline for filing the Form 470. In reality, the deadline is February 21, 2012. But don't wait until then to file. If you file your Form 470 on February 21$^{st}$, then you will have to select a vendor, negotiate and sign a contract (if necessary), and file your Form 471 all on March 20$^{th}$. Leave yourself some time.

The deadline is determined by working backwards from the Allowable Contract Date (ACD). The ACD is 28 days from the day your form is submitted online. If you file online, it's 28 days from when you click "Submit." If you file on paper, it's 28 days from the day the form is data-entered. Note that the form does not have to be certified to start the 28-day clock, only submitted.

What's the earliest you can file a Form 470? It varies from year to year, but it's generally in June, a year before the start of the funding year.

Do not wait to file the Form 470. If there is some service you are unsure of, you can always file a second Form 470 with that service on it.

## RFPs

If you have an RFP:

1. The RFP must be available for at least 28 days. So if your RFP isn't available when the Form 470 is posted, the 28-day clock does not start until the RFP is available.
2. You need to check the box that says you have an RFP, and one of the boxes indicating whom to contact to get the RFP.
3. The RFP must be give to all potential bidders, not just those that ask for it.

What is an RFP? The FCC and USAC have not supplied any definition. However, based on appeal decisions, it appears that the FCC defines an RFP as "Any information pertinent to the bid which is not on the Form 470." So technical drawings, performance specifications, walk-throughs, or a different bidding schedule would all be considered an RFP.

## Where

Go to http://www.sl.universalservice.org/menu.asp, click on the "Create Form 470" button.

You can download a paper form and instructions at
http://www.universalservice.org/sl/tools/required-forms.aspx

## Why

The real reason you do the 470: when you file a Form 471, you will need to supply a Form 470 number for each funding request (FRN). (Generally, you will use a single 470 number for all FRNs.) The Form 470 number is 15 digits: 5 random digits which serve as a PIN, 4 zeros, and 6-digit sequential number. So when you return to complete a 470, you don't need to give a PIN, just the 470 Number.

The reason the FCC created the 470: The Form 470 is supposed to open a competitive bidding process. After you click "Submit," the information from your form is publicly available. Potential bidders can search for your 470, or download a data file with information from all the 470s in the country.

## How

We'll go through an actual Form 470, but here are a few tips:

1. Disable your pop-up blocker, at least for the USAC site (usac.org and universalservice.org).
2. On-Tech's Consultant Registration Number (CRN): 16043646. Please select Dan Riordan as your consultant.
3. If you sign a multi-year contract, you can refer back to the Form 470 that was posted before the contract was signed.
4. If you show a vendor/manufacturer name and/or the name of a specific product, you must say "or equivalent."

### Receipt Notification Letter (RNL)

After your form is successfully submitted, you will receive a Form 470 Receipt Notification Letter (RNL) from USAC. The RNL summarizes the information provided in the Form 470, and provides an opportunity to correct some (but not all) mistakes.

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# More Resources

## On-Tech

www.on-tech.com/erate

This handout and other E-Rate information and links are available at our Web site.

blog.on-tech.com

For a more informal discussion of the E-Rate, visit our blog.  You can search for a topic of interest to you and get an insider's view.

If you have specific questions, contact us.
   Email: info@on-tech.com
   Phone: 732-530-5435

## Schools & Libraries Division (SLD)

www.usac.org/sl

This Web site is a wealth of information, and the information is official.  Start by pointing at the light blue "Schools and Library Applicants" button, and selecting the relevant step.

File online at: http://www.sl.universalservice.org/menu.asp

Download paper forms at: http://www.universalservice.org/sl/tools/required-forms.aspx