



# **FCC Form 486: Beginning E-Rate Services**

Applicant and Service Provider Training

July 8, 2025

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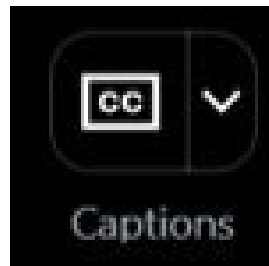
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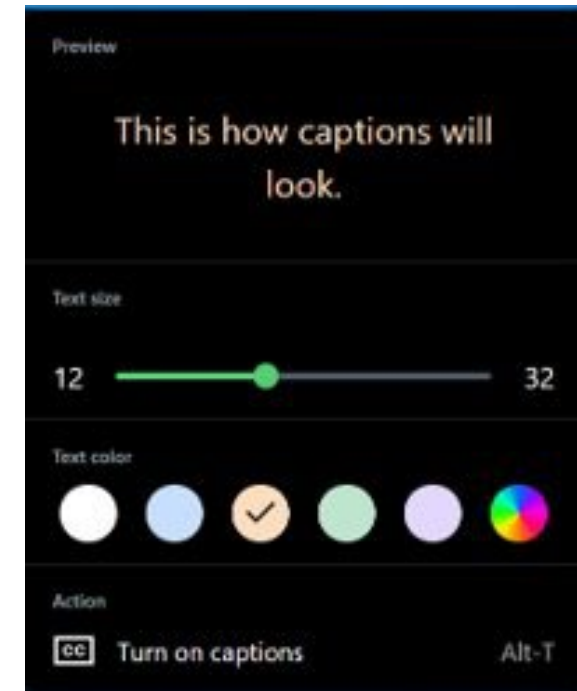
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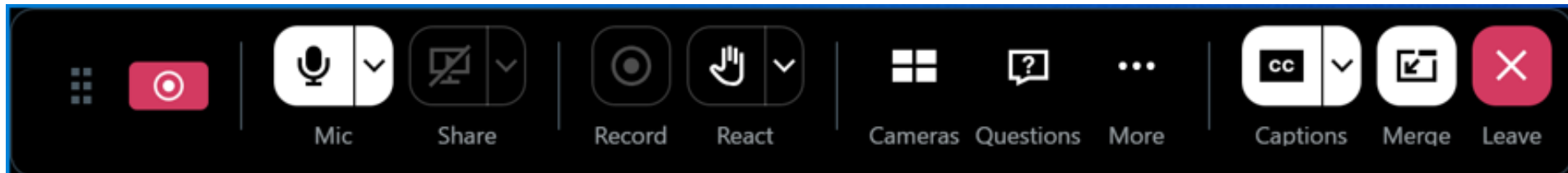
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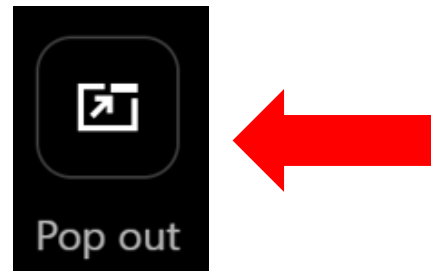


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Materials



Questions



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# MEET OUR TEAM



**Gem Labarta**

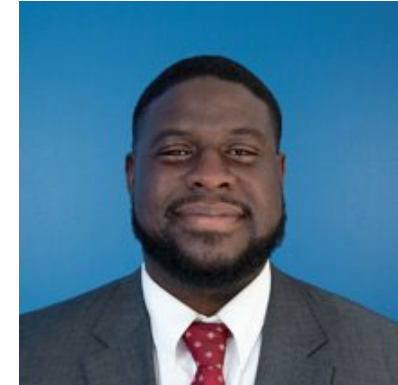
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# Agenda

- FCC Form 486 Filing
- Children's Internet Protection Act
- Post-Commitment Adjustments
  - SPIN Changes
  - Updating Your Equipment and Services
  - Adjusting Approved Funding
  - Appealing a USAC Decision
  - Commitment Adjustments and Recoveries
  - Notifications After Post-Commitment Changes
- Resources

**After you receive your funding commitment, you can start receiving services.**

# E-Rate Funding Year Activities

E-Rate is a year-long process, and it is important to meet each deadline. Use this timeline to help stay on track. Please note that these activities are for the Funding Year, which starts in July and ends in June.



# Applicant Forms and Important Dates Reminder

## Step 1

### Competitive Bidding

**FY2024:**

July 2023 - February 28, 2024

**FY2025:**

July 2024 - February 27, 2025

**FY2026:**

July 2025 - February 2026\*

**470**

## Step 2

### Apply for Discounts

**FY2024:**

January 17, 2024 - March 27, 2024

**FY2025:**

January 15, 2025 - March 26, 2025

**FY2026:**

January 2026 - March 2026\*

**471**

## Step 3

### Start Services

**FY2024:**

July 1, 2024 – June 30, 2025

**FY2025:**

July 1, 2025 – June 30, 2026

**FY2026:**

July 1, 2026 – June 30, 2027

**486**

## Step 4

### Invoicing

**Recurring Services:**

**FY2024:** July 2024 – October 2025

**FY2025:** July 2025 – October 2026

**Non-recurring Services:**

**FY2024:** July 2024 – January 2026

**FY2025:** July 2025 – January 2027

**472  
(BEAR)**

**OR**

**474  
(SPI)**

\*Date ranges shown reflect a typical timeline but are subject to change.

# **Starting Services: FCC Form 486 Filing**

# File Your FCC Form 486

Applicants file the FCC Form 486 to:

- Notify USAC that **services have started** for the Funding Request Numbers (FRNs) listed on their FCC Form 471.
- Report their compliance with the **Children's Internet Protection Act (CIPA)**.

## When Do I File the FCC Form 486?

- The FCC Form 486 MUST be certified no later than 120 days after the **Service Start Date (SSD) reported on the FCC Form 486** or 120 days after the date of the **Funding Commitment Decision Letter (FCDL)** - whichever is later.
- If you miss the FCC Form 486 deadline, USAC will adjust your SSD to a date 120 days **before** the date you certified your form.
- Your funding commitment may be reduced to reflect the reduction in months of service.

# FCC Form 486: Service Start Date

## What is my Service Start Date?

- Any date after July 1, but before June 30 of the funding year, or the date on which services actually started. The earliest date for which USAC will begin to fund recurring services.
  - **Early Service Start Date** - For installations that started before July 1 of the funding year, the SSD is still July 1.

# Service Delivery: Start and End Dates

- **Recurring services** (e.g., monthly internet service) **must** be delivered during the funding year (July 1 – June 30).
- **Non-recurring services** (e.g., equipment installations) can generally be installed through September 30 following the close of the funding year.
  - Delivery and installation **may start** before the funding year.
  - The September 30 deadline may be extended, either automatically or by request. Requests to extend this deadline must be submitted in the E-Rate Productivity Center (EPC) by the service delivery deadline.



## Example FCC Form 486 Deadline (FY2025)

FCDL Date	Service Start Date (SSD)*	Date Used to Calculate FCC Form 486 Deadline	Reason	FCC Form 486 Deadline (120 Days After Date Used)
May 1, 2025	July 1, 2025	July 1, 2025 (First SSD of FY2025)	<b>SSD</b> is later than FCDL therefore, the FCC Form 486 is 120 days from SSD	October 29, 2025
September 15, 2025	July 1, 2025	September 15, 2025 (FCDL Date of FY2025)	<b>FCDL</b> is later than SSD therefore, the FCC Form 486 is 120 days from FCDL	January 13, 2025
May 1, 2025	August 1, 2025	August 1, 2025	<b>SSD</b> is later than the FCDL therefore, the FCC Form 486 is 120 days from SSD	November 29, 2025

\*For the purposes of calculating the FCC Form 486 deadline, the service start date is never earlier than the beginning of the funding year, even for services such as special construction, which can begin before the funding year.

# Late-Filed FCC Form 486: Example of an Adjusted SSD

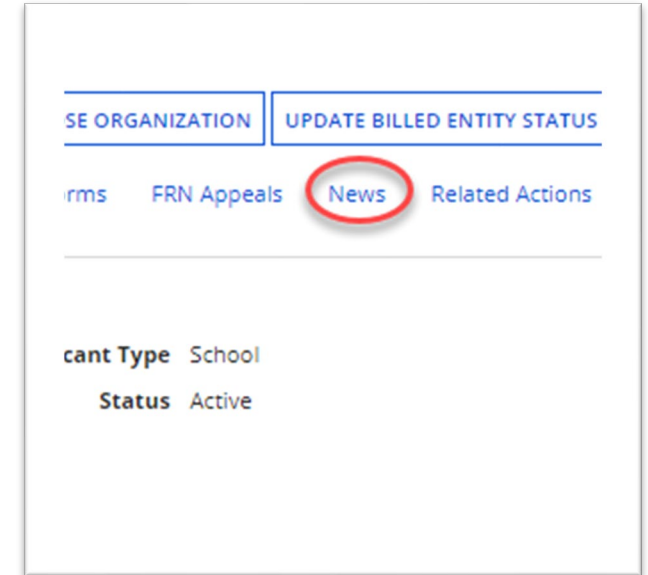
- If you received an FCDL on May 1, 2025, and the SSD on the FCC Form 471 is July 1, 2025, you will have 120 days from July 1, 2025 to certify the FCC Form 486 (i.e., until October 29, 2025).
- If you file the FCC Form 486 on **December 22, 2025** (past the FCC Form 486 certification deadline), the SSD for your FRN(s) will be adjusted to August 24, 2025 (December 22, 2025 minus 120 days). Your recurring services **before the adjusted SSD of August 24, 2025, will not be funded.**
- If you wish to appeal a USAC decision adjusting your SSD based on a late-filed FCC Form 486, you must first file the appeal with USAC, not the FCC.

# FCC Form 486 Notifications

- After you submit the FCC Form 486, USAC sends you and your service provider:
  - A confirmation of receipt
  - A letter informing you of USAC's decision
- After USAC has approved your FCC Form 486 and services have started, you or your service provider may begin invoicing USAC for the discounted amount of the costs of the approved equipment and services.

# Respond to Any 'Urgent Reminder' Notification

- If you receive an "urgent reminder" regarding your FCC Form 486, it means you appear to have missed the deadline to certify based on the SSD reported on the FCC Form 471.
- USAC delivers this letter in your **News Feed** in EPC.
- Applicants have 15 days from the date of the letter to submit and certify the FCC Form 486 without penalty (if the SSD reported on the FCC Form 471 was the actual SSD).



# **Children's Internet Protection Act**

# Children's Internet Protection Act (CIPA)

- Schools and libraries must enforce safety measures preventing minors from accessing obscene content on the internet on any devices owned by the applicant.
- Schools and libraries must [maintain documentation](#) demonstrating CIPA compliance for all funding years.
  - In the first and second year of participation in the E-Rate program, you may show work **toward** CIPA compliance, but by the third year, your documentation must show full compliance.
- To be CIPA compliant, you must have the following:
  - Internet safety policy
  - Technology protection measure/public notice
  - Public notice and hearing or meeting

# CIPA: Internet Safety Policy

- The internet safety policy must address:
  - Minors' access to inappropriate subject matter on the internet and World Wide Web;
  - The safety and security of minors when using electronic mail, chat rooms, and other forms of direct electronic communication;
  - Unauthorized access, including hacking and other unlawful activities by minors online;
  - Unauthorized disclosure, use, and dissemination of personal information regarding minors; and
  - Measures designed to restrict minors' access to information and subject matter that is harmful to minors.

# CIPA: Internet Safety Policy (Continued)

- **Additional requirements for schools:**
  - Must also include monitoring online activities of minors.
  - Must educate minors about appropriate online behavior, including:
    - Interacting with other individuals on social networking websites and in chat rooms.
    - Cyberbullying awareness and response.



## CIPA: Technology Protection Measure (e.g., Internet Filter)

A **technology protection measure** blocks or filters internet access.

- Entities must enforce the technology protection measure on their computers with internet access.
- The school or library administrator may authorize disabling the internet filter during use by an adult to enable access for bona fide research or other lawful purposes.
- The local community (school board, local educational agency, library, or other authority) decides what content is inappropriate for minors.

# CIPA: Internet Safety Policy - Public Notice

- You must provide **public notice** and hold at least **one public hearing or meeting** to address the internet safety policy.
- For private schools, public notice means notice to your constituent group.
- Additional meetings are not necessary – even if the policy is amended – unless those meetings are required by state or local rules, or by the policy itself.



# Retain CIPA Documentation

Entities must keep records:

- Schools and libraries must [maintain documentation](#) demonstrating CIPA compliance.
- In addition, they must maintain a copy of their internet safety policy, along with any updates to the policy.
- [Documentation](#) of the policy's adoption. For example, approval in the minutes of the required hearing or meeting or documented adoption by a school or library board.

# Documentation for Technology Protection Measure

- A description of the filter.
- A report or other relevant documentation on the school's or library's use of their internet filter.
- The documentation must show that the internet filter was installed and functioning properly during the funding year in which the entity was CIPA-compliant.
  - If the filter is provided by the service provider, the school could provide **archived internet access reports** of internet sites blocked or bills from the service provider verifying the filter was fully functional.
  - If the school purchased its own filter, they must **provide logs from their IT staff** showing hours the filter was in use.

# CIPA: Documentation for Public Notice and Hearing

Documentation that the school or library gave public notice and held a public hearing or meeting on the policy, for example:

- A copy of a website announcement for a regular school or library board meeting open to the public where the policy was discussed.
- An advertisement in a local newspaper of a county government hearing or meeting where the policy appeared as an agenda item.
- Copy of the minutes of the hearing or meeting and the date on which the hearing or meeting occurred.

# Questions?

# SPIN Changes

# SPIN Changes

An applicant may change their service provider for one or more funding requests by requesting a Service Provider Identification Number (SPIN) Change.

- An **Operational SPIN Change** is a decision made by the applicant to change their service provider. Restrictions may apply.
- A **Corrective SPIN Change** is when a service provider corrects data entry error or makes a change to reflect a merger or acquisition.



# When a SPIN Change Is Necessary

- In some cases, applicants are required to update their service provider information on their FCC Form 471 after services have started.
- If **the same service provider will be doing the work**, and you're only correcting the ID number:
  - If you have **not received an FCDL**, complete a Receipt Acknowledgment Letter (RAL) Modification and correct it with your Program Integrity Assurance (PIA) reviewer.
  - If you have **already received an FCDL**, submit a SPIN Change request in EPC.
  - This is typically a **Corrective SPIN Change**.
- If a **different service provider will be doing the work, or if the wrong service provider was listed**:
  - Request the update with a Corrective or Operational SPIN Change, depending on the reason for the change.
  - You can only request this after you receive a commitment.
  - Applicants may appeal if they disagree with USAC's decision.

# Operational SPIN Changes

- Operational SPIN Changes can be requested as soon as you are aware of the need for a change and under the following conditions:
  - If they are allowed under state and local procurement rules.
  - If they are allowed under the terms of the contract between the applicant and the original service provider.
  - If you have notified the original service provider of your intent to change SPINs.
  - If the reason to change is recognized by program rules as legitimate (e.g., breach of contract, unable to provide service, but NOT simply lower price).
  - The new service provider must be the runner-up in your original bid evaluation process.
- When to file:
  - File your request after your FCDL is issued and **on or before your last date to invoice, the Invoice Delivery Deadline (IDD).**

# Corrective SPIN Changes

- Corrective SPIN Changes include:
  - Data entry errors (e.g., wrong SPIN)
  - Mergers and acquisitions
  - Other changes not initiated by the applicant (e.g., FCC Form 471 changes)
- When to file:
  - File your request **on or before the last date to invoice**.
  - Service providers can initiate these requests due to a merger, acquisition, or consolidation.
  - Corrective SPIN changes **can also be made before commitment** by filing a Receipt Acknowledgement Letter (RAL) modification or by notifying your Program Integrity Assurance (PIA) reviewer.

# Updating Equipment and Services

# Updating Equipment and Services

- Services invoiced to E-Rate **must match** your FCDL.
  - Invoices must be for the specific [equipment and services](#), at contracted rates not to exceed the quantities and rates approved on your FCC Form 471, for the approved Recipients of Service (ROS).
- Discrepancies on your FCDL discovered after the issuance of the funding commitment must be resolved through a [Service Substitution](#) or an [FCC Form 500](#) before invoicing E-Rate.
- The substituted equipment and services:
  - Must have the same functionality as equipment and services approved on the original FCC Form 471.
  - Must not violate any contract provisions or state or local procurement laws.
  - Must not result in an increase in the percentage of ineligible equipment, services, or functions.
  - Must be within the scope of the establishing FCC Form 470, including any request for proposal (RFP) documents for the original equipment and services.

# Equipment and Service Substitution Requests

- Filing an Equipment and Service Substitution Request **DOES NOT** increase the funding commitment:
  - Equipment and Service Substitutions may result in a change in the pre-discount price for the supported service.
  - E-Rate program funding will be based on either:
    - The pre-discount price of the equipment or service for which support was originally requested, or
    - The pre-discount price of the new, substituted equipment or service, whichever is **lower**.

# Service Substitutions

When to file:

- If the applicant needs to make a change to equipment or services, Service Substitutions can be filed **after** USAC has issued the FCDL.
  - For example: The original bandwidth changed from 50 MB to 500 MB, as reflected in the actual contract.
- Service Substitutions must be submitted **before the Service Delivery Deadline (SDD) and before invoicing**. The request should include a detailed narrative explaining the need.

# Adjusting Approved Funding



# Adjusting Approved Funding

- Use an [FCC Form 500](#) to request specific changes to your funding commitments after USAC issues your FCDL, such as:
  - Modifying the Contract Expiration Date (CED) listed on your FCC Form 471.
  - Changing the Service Start Date (SSD) listed on your FCC Form 486.
  - Requesting an extension of the Service Delivery Deadline (SDD) for non-recurring (one-time) services.
  - Canceling or reducing funding: If you do not use all of your Category Two funding commitment, you can submit an FCC Form 500 to return unused committed funds on existing FRNs to your Category Two budget.
- The FCC Form 500 **should be filed as soon as you are aware of new circumstances requiring adjustment** to your FRN(s) and **must be filed before the SDD.**

# Notifications of Post-Commitment Decisions

- Post-commitment decisions are communicated through the Revised Funding Commitment Decision Letter (RFCDL) in EPC, including decisions for:
  - Appeals
  - SPIN Changes
  - Equipment and Service Substitutions
  - FCC Forms 500
- For FY2015 and previous funding years:
  - Paper letters for appeal decisions and FCC Forms 500
  - Email notifications for SPIN Changes and Service Substitutions

# Appealing a USAC Decision

# When to File an Appeal

- If you disagree with a USAC decision, you have 60 days from the date of that decision to request a **review of the decision**. This request is called an [appeal](#).
  - File your appeal in EPC.
  - To appeal a decision from FY2015 or prior, create a customer service case in EPC or submit an appeal directly to [appeals@usac.org](mailto:appeals@usac.org).

# Include Pertinent Information in Your Appeal

- Applicant's billed entity number (BEN) or service provider's SPIN
- Contact information including name, address, telephone number, and email address of the person who can discuss the appeal with USAC in detail
- Nickname for the appeal (to help you identify it)
- Funding year of the decision being appealed
- FRNs associated with the appeal

## Include Pertinent Information in Your Appeal (Continued)

- A narrative that explains precisely the USAC decision(s) being appealed and what specific relief is being sought
- Documentation of USAC's decision (e.g., a copy of USAC's decision letter)
- Supporting documentation such as forms and previous correspondence
- **If USAC requests additional information, please respond promptly.** If you fail to submit missing information to USAC within the time prescribed, USAC will review the appeal with the information available, which may result in the denial of the appeal.

# Granting Appeals

- USAC grants appeals under the following limited circumstances:
  - When the appeal makes clear that USAC made an error in its initial review (for example, the PIA reviewer made an error).
  - You provide USAC with new information and/or documentation you did not provide when the original request was made.
  - When USAC receives a policy clarification, or a new policy impacts the original decision.
- If you are seeking a waiver of an FCC rule, you must file it directly with the FCC.
  - For example, requests to consider FCC Forms 471 filed after the window closed must be directed to the FCC as a window waiver request.

# How You Will Be Notified of Your Appeal Status

- After an applicant files an appeal, USAC issues an **Appeal Confirmation Letter**.
- If an appeal reviewer has questions or requires additional information, they will reach out through EPC.
- USAC issues its appeal decision in a [Revised Funding Commitment Decision Letter \(RFCDL\)](#).
- If USAC denies the appeal, you may file an [appeal with the FCC](#).



# Questions?

# **Commitment Adjustments and Recoveries**

## Causes of Commitment Adjustments and Recoveries

USAC conducts the following types of reviews that may result in an adjustment to an applicant's commitment or monetary recovery from the applicant and/or service provider:

- Audits
- Payment Quality Assurance (PQA)
- Invoicing
- Appeals
- Heightened Scrutiny
- Program Integrity Assurance (PIA)

# The Commitment Adjustment and Recovery Process

- As a result of these reviews/audits, USAC may discover that certain funds were committed and/or disbursed in error.
- The Federal Communications Commission (FCC) requires USAC to rescind commitments and recover funding that has been improperly disbursed.
- USAC refers to this process as the Commitment Adjustment or “COMAD” process.
- Commitment Adjustment (COMAD) Letters and Recovery of Improperly Disbursed Funds (RIDF) Letters are issued with all relevant details of the review/audit that resulted in the adjustment to the applicant’s commitment or a request to return program funds.
- If a COMAD action is necessary, a COMAD or RIDF Letter will be issued to the applicant and/or service provider.

# How to Resolve a Commitment Adjustment (COMAD)

- When a **COMAD Letter** is issued but no funds have been disbursed, no monetary recovery is being sought by USAC, and the applicant does not need to take further action.
- When a **COMAD with Monetary Recovery Letter** is issued, the applicant and/or service should return the program funds requested in the letter.
- When a **RIDF Letter** is issued, the applicant and/or service provider should return the improperly disbursed program funds.
- If you do not agree with the recovery letter received, you have 60 days to appeal the decision to USAC.

# Penalties for Failing to Act on Commitment Adjustments

- If no action is taken in response to a recovery letter, a Demand Payment Letter will be issued, creating a debt.
- [Add something about when the 2<sup>nd</sup> Demand Payment Letter goes out]
- If payment is not made in response to the two Demand Payment Letters, the responsible party will go on "Red Light" status.
  - All pending applications will be held.
  - All invoices submitted will be held and/or subject to rejection.
  - The applicant/service provider will not be able to participate in E-Rate, the Emergency Connectivity Fund (ECF), or the other universal service programs, including the Schools and Libraries Cybersecurity Pilot Program, until the debt is resolved.
  - Debts will be sent to the U.S. Treasury for collection.

# Document Retention Requirement

Applicants and service providers are required to keep records relating to the application for, receipt, and delivery of supported services and equipment for at least **10 years** after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

**TIP:** In your personal record keeping, use file names and folder names that are specific and descriptive to locate them more easily.

Learn more on the [Document Retention](#) page, where you can view a list of each type of document to retain for each step in the E-Rate process.



# Resources

On the USAC website, you can find detailed information on these topics:

- [FCC Form 486 Filing](#)
- [SPIN Changes](#)
- [Service Substitutions](#)
- [FCC Form 500](#)
- [Appeals](#)
- [Service Provider Webinar](#)
- [E-Rate Program Overview Webinar Slide Deck](#)
- [Open Data](#)

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# Questions?

# E-Rate Customer Service Center (CSC)



**Call us at (888) 203-8100**

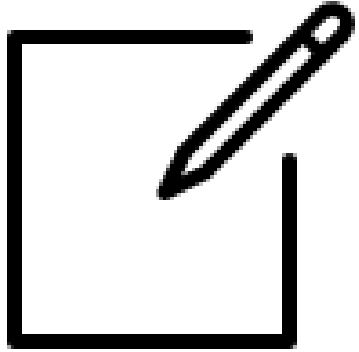
Monday – Friday 8 a.m. to 8 p.m. ET



**Create a customer service case in the**  
**[E-Rate Productivity Center \(EPC\):](#)**

1. Log in to EPC.
2. Select the **Contact Us** link from the upper right menu on the landing page.

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