



E-Rate Fall Training: Post-Commitment Process

November 25, 2025

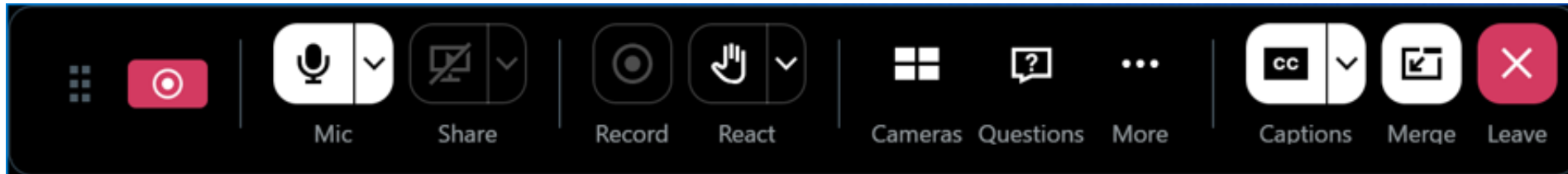
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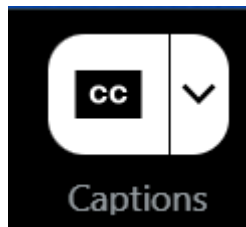
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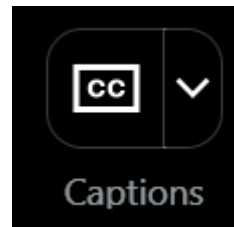
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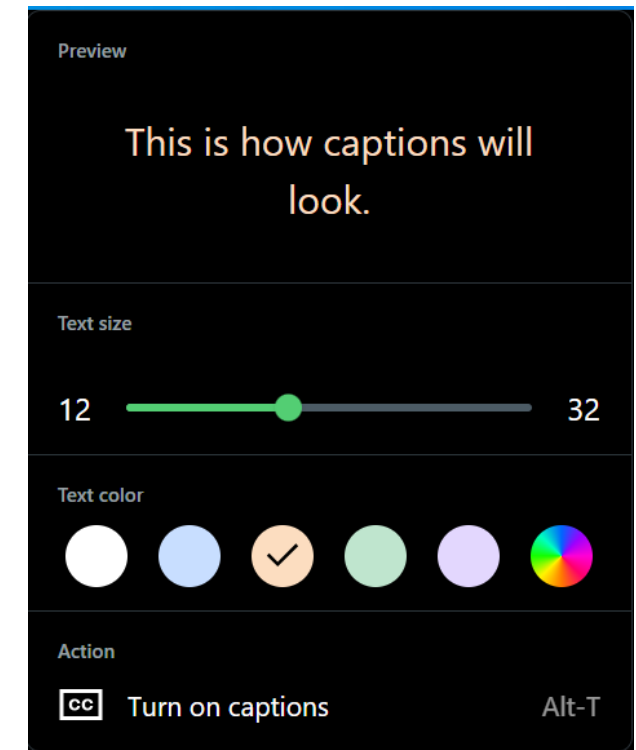
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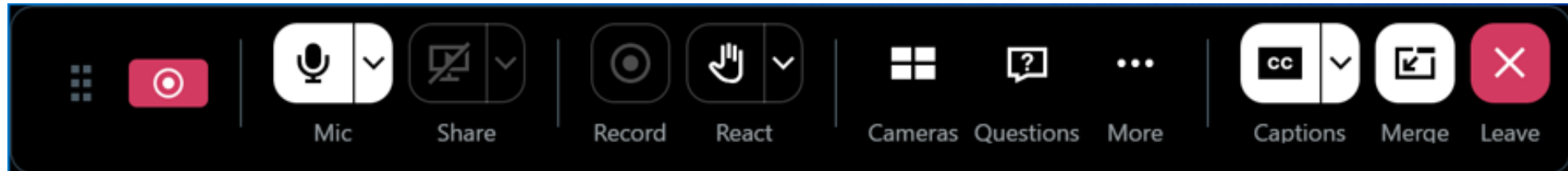
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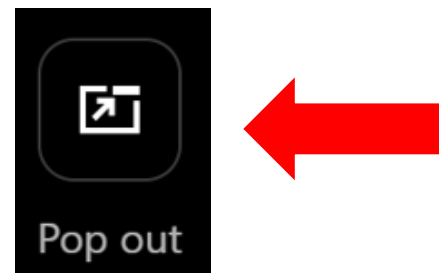
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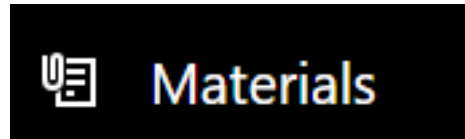


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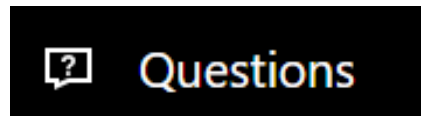


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Questions

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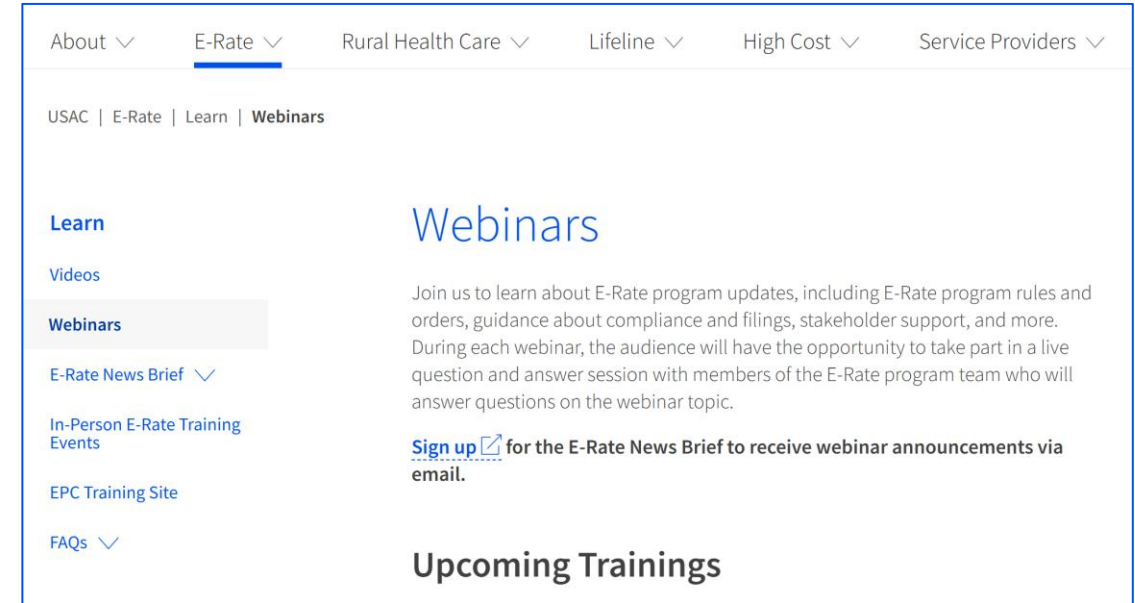
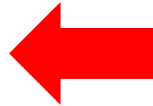


Create a customer service case

1. Log in to the [E-Rate Productivity Center \(EPC\)](#)
2. Select the **Contact Us** link from the upper right menu on the landing page.

E-Rate Fall Training Series 2025

- ✓ E-Rate Program Overview - September 18
- ✓ Pre-Commitment - September 25
- ✓ Invoicing – November 19
- ✓ Category Two Budgets – November 20
- ❑ Post-Commitment - November 25
- ❑ EPC Admin Window - December 2
- ❑ Eligible Services – December 3



- The E-Rate Fall Training Webinar Series is suitable for all E-Rate experience levels.
- Webinars are recommended for both applicants and service providers.
- Please visit the E-Rate [Webinars](#) page for additional information including course descriptions, registration links for future webinars, and access to recordings and handouts from previous webinars.

MEET THE TEAM



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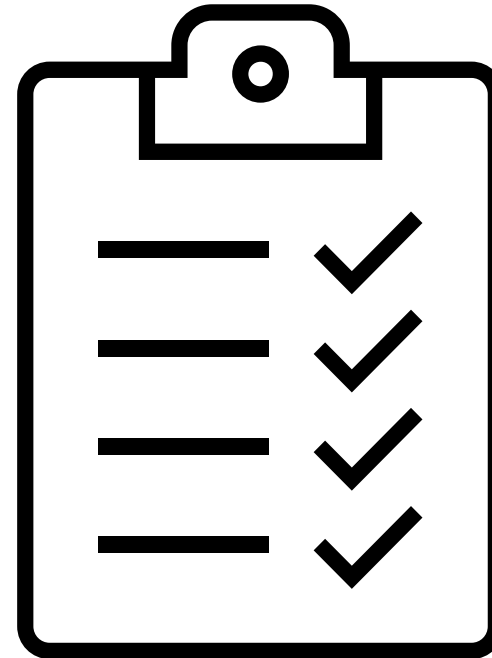


Tom Lodico

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Agenda

- Post-Commitment Overview
- FCC Form 486 & Children's Internet Protection Act (CIPA)
- Post-Commitment Adjustments
 - Service Provider Information Number Changes
 - Update Your Equipment and Services
 - FCC Form 500
- Commitment Adjustments
- Appeals
- Key Takeaways
- Resources
- Q & A



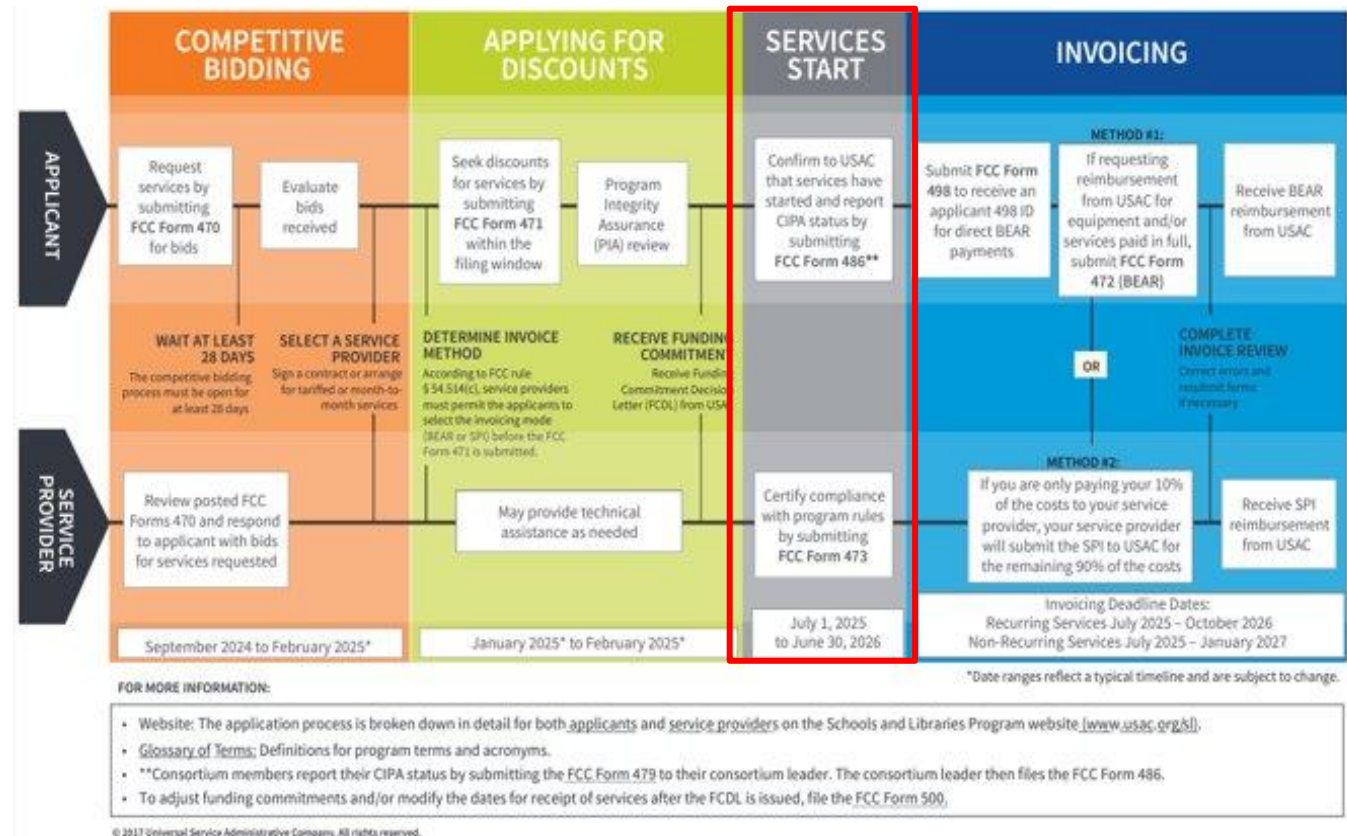
Post-Commitment Overview

Post-Commitment

Once applicants have a funding commitment decision letter (FCDL), they move into the Post Commitment process.

The Post-Commitment process primary functions include:

- Starting Services (FCC Form 486)
- FCDL Adjustments (FCC Form 500, SPIN Changes, Service Substitutions)
- Invoicing USAC (FCC Forms 472 or 474)

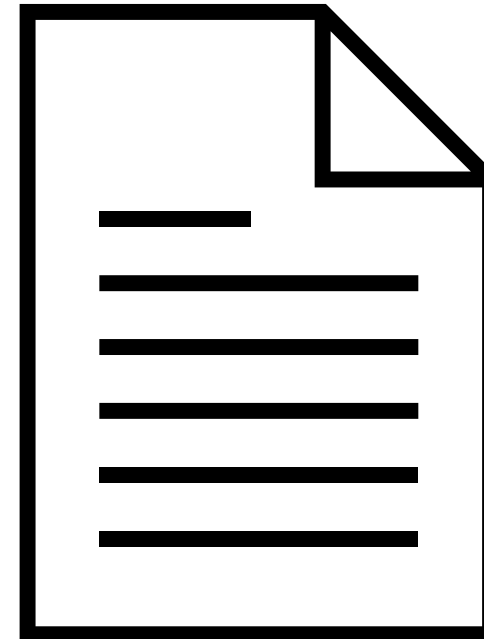


File the FCC Form 486

The 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 current status of their compliance with the [Children's Internet Protection Act \(CIPA\)](#).



Timeline for Delivery of Equipment and Services

- **Recurring services** (e.g., monthly internet access) 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 can start before the funding year.
 - The September 30 deadline can be extended, either automatically or by request.

When Can My Services Start?

- July 1st is the start of the funding year and the earliest date for which you can receive funding for recurring services.
- You may [start installation of Category Two \(C2\) equipment and services as early as April 1 before the funding year.](#)
- In some cases, you may start services after July 1, but before June 30 of the funding year.
 - For instance, if equipment and services are delivered on August 7 of the funding year, the Service Start Date will be August 7.

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** or 120 days after the date of the **Funding Commitment Decision Letter**, whichever is later.
- If you miss the FCC Form 486 deadline, USAC adjusts your Service Start Date 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.
 - If your Service Start Date is adjusted after you have invoiced and been reimbursed, you may have to return funds to USAC.

FCC Forms 486 Urgent Reminder Notification

- An urgent reminder letter is issued to applicants that appear to have missed **the deadline to certify** based on the Service Start Date reported on the FCC Form 471.
 - The letter is delivered in the EPC News Feed.
 - Applicants have **15 days** from the date of the letter to submit and certify the FCC Form 486 without penalty (if the Service Start Date reported on the FCC Form 471 was the actual service start date).

Example of an Adjusted FCC Form 486 Due to Late Filing

- If you received the commitment decision from USAC on May 1, 2025, and the service start date on the FCC Form 471 was July 1, 2025, you have 120 days from July 1, 2025, to certify the FCC Form 486. This gave you a deadline of October 29, 2025.
- If you file the FCC Form 486 on **December 22, 2025** (past the FCC Form 486 certification deadline), the **Service Start Date** will be adjusted to August 24, 2025 (December 22, 2025, minus - 120 days). Your recurring services **before the Service Start Date will not be funded**.
- If you wish to [appeal](#) a USAC decision adjusting your **Service Start Date** based on a late FCC Form 486, you must appeal to USAC, not the FCC.

FCC Form 486 Notifications

- After submitting the FCC Form 486, you and your service provider will receive two notifications:
 - An initial notification in the E-Rate Productivity Center (EPC) confirming that you certified the form.
 - The FCC Form 486 Notification Letter indicating your form completed review and 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.

Children's Internet Protection Act (CIPA)

Children's Internet Protection Act (CIPA)

- Requires that schools and libraries enforce certain safety measures preventing minors from accessing obscene content on the internet.
- Entities must keep records.
 - Schools and libraries must [maintain documentation](#) demonstrating their CIPA compliance.
 - Maintain documentation showing CIPA compliance for all funding years.
 - In the first year, they may show work toward CIPA compliance unless granted a waiver for the 2nd year. They must be compliant by the 3rd year.
- **Three requirements** of CIPA compliance are:
 - Internet Safety Policy
 - Technology Protection Measure
 - Public Notice and Hearing or Meeting

Internet Safety Policy

- The Internet Safety Policy must address:
 - Access by minors to inappropriate subject matter on the internet;
 - 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.

Internet Safety Policy (cont.)

- **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; and
 - Cyberbullying awareness.

Technology Protection Measure (e.g., Internet Filter)

- You must specifically block or filter internet access.
 - Entities **must enforce** operation of the technology protection measure during use of its computers with internet access.
 - If an adult requests unfiltered internet access for bona fide research or another lawful purpose, the person with authority for the administration of the school or library may authorize the disabling of the internet filter.
 - The local community (school board, local educational agency, library, or other authority) decides what content is inappropriate for minors.

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 rules, local rules, or by the policy itself.



What Documents Should You Retain?

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.

Required CIPA Documentation

- Entities must [maintain documentation](#):
 - Indicating their CIPA compliance.
 - Demonstrating their internet safety policy, along with any updates to the policy.
 - Showing 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.

For example:

- Filter provided by service provider:
 - A school could provide archived internet access reports from the internet service provider showing blocked websites or bills from the service provider verifying the filter was fully functional.
- School purchased its own filter:
 - A school must provide logs from their IT staff showing hours the filter was in use.

Post-Commitment Adjustments

Post-Commitment Notifications

The E-Rate program communicates decisions regarding post-commitment changes through a **Revised Funding Commitment Decision Letter**. Examples include:

- Decisions on Appeals
- Service Provider Identification Number (SPIN) changes
- Decisions on Service Substitution requests
- Decisions on filed FCC Forms 500

For funding years **2016 and later**, these notifications are delivered through the E-Rate Productivity Center (EPC).

For **FY2015 and previous** funding years:

- Paper letters for appeal decisions and FCC Forms 500.
- Email notifications for SPIN changes and service substitutions.

Service Provider Information Number Changes

Changing Service Provider Information

There are two situations that may require a change to the **Service Provider Identification Number** (SPIN Change) on your FCC Form 471.

- An **Operational SPIN Change** is a deliberate decision made by the applicant to change their service provider. Some restrictions may apply.
- A **Corrective SPIN Change** corrects data entry errors or reflects a merger or acquisition. Unless a data entry error occurs, Corrective Spin Changes result from actions not initiated by the applicant.

Operational SPIN Change

- Request this as soon as you are aware of the need for a change and under the following conditions:
 - If allowed under state and local procurement rules.
 - If 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 to lower price).
 - The new service provider must be the runner-up in your original bid evaluation process.
- When to file:
 - Before your [invoicing deadline](#).

Corrective SPIN Change

The applicant or the service provider can correct service provider information in the case of:

- Data entry errors
- Mergers and acquisitions
- Other changes not initiated by the applicant

When to file:

- On or before the last date to invoice
- Service providers may file in the case of a merger, acquisition, or consolidation

Note – If you need to correct service provider information before you receive a funding commitment, you may 1) file a Receipt Acknowledgement Letter modification, or 2) notify your Program Integrity Assurance reviewer of the need for correction.

Update Your Equipment and Services

Service Substitutions

- A Service Substitution is a change in the products and/or services specified on an FRN in the FCC Form 471. 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 services or functions.
 - Must be within the scope of the establishing FCC Form 470, including any request for proposal documents, for the original equipment and services.

Service Substitutions (cont.)

Filing a Service Substitution **will not** increase the funding commitment, even if the substitution results in an increase in the pre-discount price for the supported service.

E-Rate program **funding is based on** whichever is lower:

- The pre-discount price of the originally requested equipment or service
- The pre-discount price of the new, substituted equipment or service

Service Substitutions: When to File

- Service Substitutions can be filed **after USAC has issued the Funding Commitment Decision Letter** if the applicant needs to make a change to equipment or services.
 - For example: The original bandwidth changed from 50 MB to 500 MB as reflected in the actual contract.
- You must submit Service Substitutions **before the Service Delivery Deadline** . The request should include a detailed narrative explaining the need.
- Service providers or equipment manufacturers may submit a “global” service substitution if, for example, they want to replace a discontinued product with a new product across all funding requests.

FCC Form 500

FCC Form 500: Adjusting Approved Funding

An applicant can file an [FCC Form 500](#) to request specific changes to their funding commitments after USAC issues the Funding Commitment Decision Letter. The FCC Form 500 should be filed **as soon as the applicant is aware** of new circumstances that require adjustment to their Funding Request Number(s) (FRN).

Examples of these changes include:

- Modifying the Contract Expiration Date listed on your FCC Form 471.
- Changing the Service Start Date listed on your FCC Form 486.
- Canceling an FRN.
- Requesting an extension of the Service Delivery Deadline for non-recurring (one-time) services.

FCC Form 500: Adjusting Approved Funding (Continued)

The FCC Form 500 can also be used to reduce the amount of funding allotted to a Funding Request Number.

Example of funding reduction:

- If you do not use all of your Category Two funding commitment, you can submit an FCC Form 500 to return funds to your Category Two budget.

After successfully processing the FCC Form 500, USAC issues a revised funding commitment decision letter (RFCDL).

FY 2026– 2030 Category Two (C2) Budget Management

FY 2026 will be the first year of the FY 2026-2030 funding cycle.

- Unused funds from the FY 2021 – 2025 Category Two (C2) budget will not roll over to the FY 2026 – 2030 funding cycle.
- The [E-Rate C2 Budget Tool FY2021+](#) provides data on the FY2021-2025 & the new FY2026-2030 C2 budget cycle. It is available on the [Tools](#) page along with a [video](#) on how to use the tool and a [glossary of terms](#).
 - The tool has been updated to show C2 budget forecast data for the FY 2026-2030 C2 budget cycle.
- Applicants will be required to validate their student counts or library square footage in the first year they apply for C2 support during the FY2026-2030 cycle.

Commitment Adjustments

Commitment Adjustment and Recoveries

USAC may conduct a review that may result in adjusting 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)

Commitment Adjustment and Recoveries

- As a result of these review/audits, USAC may discover that certain funds were committed and/or disbursed in error.
- The 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.
- USAC issues Commitment Adjustment Letters (COMAD Letters) or Recovery of Improperly Disbursed Funds Letters (RIDF Letters) with all relevant details of the review/audit that resulted in the adjustment to the applicant's commitment or request to return program funds. These letters are issued to the applicant or service provider.
- View the [How to view your Commitment Adjustment Letter \(CAL\)](#) to navigate where to find it in EPC.

How To Resolve A COMAD or RIDF

- **Commitment Adjustment (COMAD) Letter With No Recovery:** No monetary recovery is being sought by USAC. The applicant does not need to take further action unless it wishes to appeal. The commitment will be adjusted and no longer available for disbursement.
- **Commitment Adjustment (COMAD) with Monetary Recovery Letter:** The commitment will be adjusted, and previously disbursed funds must be returned. The applicant and/or service provider should return the program funds requested in the letter.
- **Recovery of Improperly Disbursed Funds (RIDF) Letter:** The commitment remains the same, but the previously disbursed funds must be returned. The applicant and/or service provider should return the disbursed funds.
- If the applicant or service provider disagrees with the COMAD Letter or RIDF Letter received, they have 60 days to appeal that decision to USAC.

If You Don't Respond to a COMAD Letter

- All pending applications will be held.
- All invoices submitted will be held and/or subject to rejection.
- Applicant/Service provider will not be able to participate in E-Rate until COMAD is resolved.
- Debt could be sent to the U.S. Department of the Treasury.

Compliance Letters

- Issued to applicants for program violations during program reviews/audits
- Require applicants to update their **Policies and Procedures** to ensure proper mitigation steps are in place to prevent future **program violations** related to the findings
- **Result in a hold on all FCC Form 471 decisions and invoices** until the updated policy and procedures have been provided to USAC and accepted
- Lack of response in providing updated Policies and Procedures within the **60-Day timeline** may result in **denial of any pending FCC Forms 471 and/or invoices**

Appeals

What is an Appeal?

- Any aggrieved party (i.e., you **disagree with a USAC decision**) that wishes to appeal a USAC decision must first file an appeal with USAC to seek review before filing an appeal with the FCC. For example, if you believe that USAC incorrectly reduced your program discount rate, and you have evidence that can show that error, you can submit an appeal to USAC (see [E-Rate Program Appeals Guidelines](#)).
 - After USAC makes an appeal decision, you might still disagree with the outcome, and you may appeal USAC's decision to the FCC.
- Program participants – applicants or service providers – have 60 days to appeal a USAC decision.
 - Appeals for 2016 and later are filed in EPC.
 - To appeal a decision from 2015 or prior, create a customer service case in EPC.
- View the [E-Rate Appeal/Waiver Guide](#) for further guidance on how to file and search for an appeal in EPC.

What to Include in Your Appeal

- Applicant (Billed Entity Number) or service provider (Service Provider Identification Number)
- Contact information including name, address, telephone number, and email address of the person who can discuss the appeal with USAC in detail
- A nickname for the appeal (to help identify it)
- Funding year of the decision being appealed
- Funding Request Numbers associated with the appeal
- The USAC decision that you are appealing

What to Include in Your Appeal (cont.)

- 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 the program participant fails to submit the missing information to USAC within the time prescribed, USAC will review the appeal with the information on file, which may result in the denial of the appeal.

Appeal Decisions

- Appeals may be granted under the following limited circumstances:
 - When the appeal makes it clear that USAC made an error in its initial review (for example, the Program Integrity Assurance reviewer made an error).
 - When the filer provides USAC with new information and/or documentation, it did not provide when the original request was made.
 - When USAC receives policy clarification or when a new policy impacts the original decision.
- If you are seeking a waiver of a Federal Communication Commission (FCC) rule, you must file a waiver 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.

Appeals Notifications

- After filing an appeal, you will receive 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 the applicant or service provider does not agree with the USAC decision in the RFCDL, they can file an appeal with the FCC.

Document Retention

- Records can be kept electronically.
 - Use file names and folder names that are specific and descriptive to help you locate them more easily.
- **Applicants and service providers** are required to [retain documentation](#) that demonstrates compliance with the statutory or regulatory requirements for all E-Rate program purchases of equipment and services **for a period of 10 years** after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.
 - For example, for **recurring internet access service** for FY2025, both the **applicant and the service provider** must retain all records until **at least** June 30, 2036.
- Winning **service providers** must retain records related to the purchase and delivery of E-Rate eligible equipment, signed and executed contracts, bidding information, invoices, provision of services, and other matters relating to equipment and services.

Key Takeaways

Key Takeaways

- Children's Internet Protection Act services require a **public notice** and at least **one public meeting** to address the internet safety policy.
- The earliest **service start date** is July 1 of the funding year.
- Post-commitment funding changes are found in **Revised Funding Commitment Decision Letters** in EPC.
- Post-commitment Service Provider Identification Number changes must be filed on or before the **last date to invoice**.
- Service substitutions **cannot increase funding** commitment and must be filed before the last day to receive service.

Resources

Resources

On the USAC website you can find detailed information on:


- [Category Two \(C2\) Budgets](#)
- [Transfer of Equipment](#)
 - [Webinar Recording: E-Rate Equipment Transfers](#)
- [Document Retention](#)
- [Glossary of Terms](#)
- EPC User Guides
 - [Service Substitutions](#)
 - [FCC Form 486](#)
 - [SPIN Change](#)
- [How to View Your Commitment Adjustment Letter](#)

Live Q&A

Submit your questions
about today's topics:

- FCC Form 486
- CIPA Compliance
- SPIN Changes
- FCC Form 500
- Commitment Adjustments
- Appeals

Questions



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Questions you send and answers from the staff will appear here

Your question will be sent to staff

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Q&A Tips

- ✓ Type your queries into the “Questions” box in your webinar control panel.
- ✓ Write in full sentences.
- ✓ Ask one question at a time.
- ✓ Click the box to expand it and see all the written answers.

Questions?

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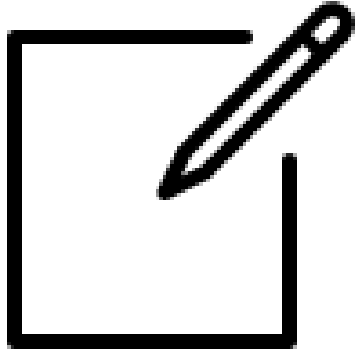
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- ☐ Eligible Services 101 - December 3



The screenshot shows the 'E-Rate' section of the USAC website. The navigation bar includes 'About', 'E-Rate', 'Rural Health Care', 'Lifeline', 'High Cost', and 'Service Providers'. Below the navigation bar, the 'E-Rate' section is active, showing a breadcrumb trail: 'USAC | E-Rate | Learn | Webinars'. On the left, a sidebar menu lists 'Learn', 'Videos', 'Webinars' (which is highlighted), 'E-Rate News Brief', 'In-Person E-Rate Training Events', 'EPC Training Site', and 'FAQs'. The main content area is titled 'Webinars' and contains a paragraph about joining to learn about E-Rate program updates. It includes a 'Sign up' link with an external icon, followed by the text 'for the E-Rate News Brief to receive webinar announcements via email.' At the bottom of the main content area, the heading 'Upcoming Trainings' is visible.

- The E-Rate Fall Training Webinar Series is suitable for all E-Rate experience levels.
- Webinars are recommended for both applicants and service providers.
- Please visit the E-Rate [Webinars](#) page for additional information including course descriptions, registration links for future webinars, and access to recordings and handouts from previous webinars.

Take Our Survey



- We want to hear about your webinar experience.
- A survey will appear on your screen at the end of the webinar.
- If you are not able to complete the survey today, one will be emailed to you within one to two business days.
- We appreciate your feedback!

Thank You!





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