

E-RATE SIMPLIFICATION UPDATES

FCC Order 26-30 — SECTION III.B

In this section of the order, the FCC adopts practical rule changes to reduce common pain points and streamline the E-Rate application and funding process for schools and libraries.

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PROGRAM SIMPLIFICATIONS
ADOPTED



SERVICE TRANSITIONS DURING FUNDING YEAR

Applicants transitioning between providers can file **partial-year funding requests** for both old and new services, estimating cutover dates. A post-commitment request can be used to adjust dates — even if resulting in a higher commitment — once actual dates are known.



COST ALLOCATION GUIDANCE EXPANDED

The **90% ancillary use presumption** now applies to all recurring Category 1 services (not just Internet access). If $\geq 90\%$ of a service is used for eligible purposes, no cost allocation is required. Off-campus use still must be allocated.



MID-YEAR BANDWIDTH INCREASES

Applicants can request a **service substitution** to increase bandwidth mid-funding year at the existing commitment amount. The applicant covers any price difference for the remainder of the year. A new Form 470 is required for subsequent funding years.



SPAM BID HANDLING

Bids lacking pricing can be **disqualified as non-responsive** without stating this criterion in the Form 470. Applicants must retain and document the disqualification. Duplicate spam bids only need to be disqualified once.



BIDS AFTER THE 28-DAY PERIOD

Applicants must consider **all bids received before evaluation begins** — even if after the 28-day waiting period — unless a specific deadline was stated in the Form 470 or RFP. Setting a deadline remains the applicant's option.



CAMPUS DEFINITION EXPANDED

Multiple schools with the **same billed entity** may now share a single school campus for Category 2 internal connections. Voice services are also removed from the WAN definition as voice is no longer E-Rate eligible.



INVOICE FILING DEADLINE RELIEF

Applicants/providers may now request a 120-day extension **within 15 days after** missing the deadline. A new **60-day grace period** allows re-submission of timely-filed but rejected invoices without a formal appeal.



NON-INSTRUCTIONAL FACILITY COST ALLOCATION

Applicants **do not need to cost-allocate** NIF use of shared Category 2 equipment — even when multiple NIFs use the same device — as long as the most cost-effective option was selected without regard to the NIF's use.

★ MAJOR CHANGE — FCC FORM 486 ELIMINATED (Beginning FY2028)

The Form 486 (Receipt of Service Confirmation & CIPA Certification) will **no longer be required** starting in Funding Year 2028. CIPA certifications move to the **Form 471** application. Consortium members must submit their Form 479 before the FY2028 application window.