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## Correctable Errors on E-Rate 470 and 471 Forms

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On June 14, 2006 the Universal Service Administrative Company (USAC) released detailed guidance as to how to correct ministerial and clerical errors on E-Rate applicant's Form 470 or Form 471. This guidance is in direct response to the FCC Order (FCC 06-54) released on May 19, 2006 granting the appeals of the Bishop Perry Middle School and 195 other applicants that had sought relief for minor clerical, ministerial or procedural errors. In that Order, the FCC waived its relevant rules and granted the appeals related to failure to comply with Minimum Processing Standards, failure to timely file an FCC Form 471 or failure to timely file certifications related to an FCC Form 470.

As a result of the Bishop Perry Order, USAC is required to inform all applicants promptly in writing of any and all ministerial or clerical errors that are detected in their applications, along with a clear and specific explanation of how the applicant can remedy those errors. Applicants then have 15 calendar days from the date of receipt of written notice from USAC to amend or refile their FCC Form 470, FCC Form 471 or associated certifications. The ability to correct mistakes is generally limited to FY 2006 and subsequent year funding requests. USAC will not reopen prior year issues, although it will apply the new guidelines to any prior-year applications or appeals that are still pending.

Correctable errors are broken into the following categories:

1. Errors on Forms 470 that were previously Minimum Process Standards rejections. These corrections must be made before the Form 470 can be posted, which starts the 28-day clock.
2. Errors on Forms 470 that can be corrected by amending the Form 470. These corrections are made to forms that are already posted, and do not affect the 28-day clock.
3. Errors on Forms 471 that were previously Minimum Process Standards rejections. These corrections must be made before the Form 471 can be data-entered and reviewed.
4. Errors on Form 471 that can be corrected by amending the Form 471. These corrections are made to forms that are already data-entered.

An applicant's ability to correct mistakes is currently limited to Form 470 and Form 471 errors. The Order provided no guidance about correcting clerical or ministerial errors on other forms.

Timing your correction is critical. Applicants have 20 days from the date of notification from USAC (15 days to respond, plus an assumed mail delivery time of an additional 5 days) to provide USAC with notice of allowable corrections. For applicants who are currently in contact

and working with PIA, the clock started on Friday, July 14th, the date on which USAC mailed out a general notice about these new procedures to some 24,000 FY 2006 applicants. If you are one of these applicants, the deadline to correct mistakes is Thursday, August 3rd.

## **FCC Form 470**

There are two categories of errors that can be corrected without refileing the Form 470. Correction to items listed in the first category, *Minimum Processing Standards Errors*, with the exception of the Certification Deadline and the Authorized Person Signature, must be received by USAC before the form can be posted, which starts your 28-day clock. Corrections to the second category, *Errors that can be corrected by amending the Form 470*, can be made after the Form 470 has been posted.

### A. Minimum Processing Standards Errors

The following items previously listed as Minimum Processing Standards in the FCC Form 470 Instructions will no longer be cause for automatic rejection. However, USAC must receive the missing information within 15 days of notification from USAC before the FCC Form 470 can be posted. The 28-day clock starts once the form is posted. It should be noted that if you are going to take full advantage of the time to make corrections, that will require at least 43 days to process (15 days to correct plus 28 days for posting.) If you do not provide the information within 15 days, your Form 470 will be rejected for failing Minimum Process Standards and any resulting FRN on a Form 471 will be denied. To avoid these errors, USAC encourages applicants to use the Apply Online system.

<b>ERROR LOCATION</b>	<b>CORRECTIVE ACTION ALLOWED</b>
FCC Form 470 – Funding Year Specific	Applicants who use the wrong version of the form from a prior funding year can make corrections to the correct version of the form within 15 days of notification from USAC. This item is required before the form can be posted which starts the 28-day posting requirement.
FCC Form 470-Block 1, Items 1 and 3: Applicant Name and Contact Information	As long as there is sufficient contact information on the form to be able to make contact with someone, applicants can provide the missing contact information within 15 days of notification from USAC. This information is required before the form can be posted, which starts the 28-day posting requirement.
FCC Form 470-Block 2, Items 8, 9, 10, and 11: Summary Description of Needs or Services Requested (Telecommunications Services, Internet Access, Internal Connections Other than Basic Maintenance, and Basic Maintenance of Internal Connections)	Applicants who did not enter any information in any of these items can correct this error by providing the missing information within 15 days of notification from USAC. This information is required before the form can be posted, which starts the 28-day posting requirement.

	Applicants who seek to correct information already posted for these items or who want to add a category of service that was not entered when the form was posted will not be allowed to make those corrections. Paper filers can correct these items before their form is posted, and online filers can file a new Form 470 as long as there is still time in the filing window.
FCC Form 470-certification submission deadline	For applications completed within the filing window, applicants can file the certifications within 15 days of notification from USAC.
FCC Form 470-Block 5, Item 27: Signature of Authorized Person	Applicants who forget to sign their certification page can correct this error within 15 days of notification by USAC. To avoid this error, USAC encourages applicants to use their PIN to e-certify.

*B. Errors that can be corrected by amending the Form 470*

For the items listed below, applicants can amend their Form 470 without restarting the 28-day clock -- you need only to provide the information within the 15 days after notification from USAC.

<b>ERROR LOCATION</b>	<b>CORRECTIVE ACTION ALLOWED</b>
FCC Form 470-Block 1, Item 6a Contact Person Name	Applicants will be able to submit corrections to the contact information within 15 days of notification from USAC. Before making the change, the correction will be reviewed to ensure that the change does not circumvent the FCC's competitive bidding requirements.
FCC Form 470-Block 4, Item 16c Eligible Entities That Will Receive Services – School districts, library systems or consortium applications that serve multiple entities	Applicants can submit corrections to the number of eligible entities within 15 days of notification from USAC, as long as it is not a significant departure from the scope of the original request and is due to clerical error.
FCC Form 470-Block 4, Item 17 Billed Entities that will be paying the bills information.	Applicants can submit corrections to the list of Billed Entities that will cite the Form 470 within 15 days of notification from USAC.

**FCC Form 471**

Applicants who discover any error on their FCC Form 471 always have the option of filing a new FCC Form 471 as long as they can do so within the filing window. The following two categories of errors, however, can be corrected without refileing the FCC Form 471.

*A. Minimum Processing Standards Errors*

Some items previously listed in the FCC Form 471 Instructions as Minimum Processing Standards will no longer be cause for automatic rejection. However, USAC must receive the missing information within 15 days of notification from USAC before the Form 471 can be data-entered and reviewed for funding. If you do not provide the information within 15 days, your form or FRN will be rejected for failing Minimum Process Standards. You can avoid these errors by using the Apply Online system.

<b>ERROR LOCATION</b>	<b>CORRECTIVE ACTION ALLOWED</b>
FCC Form 471 – Funding Year Specific	Applicants who use the wrong version of the form from a prior funding year can make corrections to the current version of the form within 15 days of notification from USAC to correct this error. This item is required before the form can be data entered and reviewed.
FCC Form 471-Block 1, Items 1 and 3 Applicant Name and Contact Information	As long as there is sufficient contact information on the form to be able to make contact with someone, applicants can provide the missing contact information within 15 days of notification from USAC to correct this error. This information is required before the form can be data-entered and reviewed.
FCC Form 471-Block 5, Item 13 and 14 Service Provider Identification Number (SPIN) and Name	If this information is missing completely, applicants will be able to submit the missing information within 15 days of notification from USAC. This information is required before the form can be data-entered and reviewed.
FCC Form 471-Block 6 Certification submission deadline	For applications completed within the filing window, applicants can file the certifications within 15 days of notification from USAC.
FCC Form 471-Block 6, Item 38 Signature of authorized person	Applicants who forget to sign their certification page can correct this error within 15 days of notification by USAC. To avoid this error, USAC encourages applicants to use their PIN to e-certify.

**B. Errors that can be corrected by amending the Form 471**

For the items listed below, applicants can amend their FCC Forms 471 without having to refile their application -- you need only to provide USAC with the information requested within 15 days of notification from USAC. Starting with Fund Year 2007, the notification from USAC will be on the Form 471 Receipt Acknowledgement Letter.

<b>ERROR LOCATION</b>	<b>CORRECTIVE ACTION ALLOWED</b>
FCC Form 471-Block 1 Billed Entity Contact Information	Applicants will be able to submit corrections to the contact information within 15 days of notification from USAC.
FCC Form 471-Block 4 Discount Calculations Worksheet	Applicants will be able to submit corrections to this item, even if it increases the discount rate, within 15 days of notification from USAC.
FCC Form 471-Block 5, Item 12 FCC Form 470-Application Number	Applicants will be able to submit corrections to this item within 15 days of notification from USAC.
FCC Form 471-Block 5, Items 13 and 14 Service Provider Identification Number (SPIN) and Name	Applicants will be able to submit corrections to this item within 15 days of notification from USAC as long as it is a corrective SPIN change.
FCC Form 471-Block 5, Item 15b Contract Number	Applicants will be able to submit corrections to this item within 15 days of notification from USAC.
FCC Form 471-Block 5, Item 16 Service Provider's Billing Account Number	Applicants will be able to submit corrections to this item within 15 days of notification from USAC.
FCC Form 471-Block 5, Item 18 Contract Award Date	Applicants will be able to submit corrections to this item within 15 days of notification from USAC, as long as the correction is accompanied by a certification.
FCC Form 471-Block 5, Item 22 Entities Receiving Service	Applicants will be able to submit corrections to this item, even if it causes an increase in the discount rate, within 15 days of notification from USAC. Applicants will also have an opportunity to remove entities post-commitment for purposes of the 2-in-5 Rule for Internal Connections.
FCC Form 471-Block 5, Item 23 Calculations	Applicants will be able to submit corrections to this item, even if it causes an increase in the funds requested, within 15 days of notification from USAC.
FCC Form 471-Block 6, Item 25d Amount budgeted for ineligible services	Applicants will be able to submit corrections to this within 15 days of notification from USAC.

## **Correction Process**

USAC has provided specific guidance for submitting error corrections. Please refer to <http://www.universalservice.org/sl/tools/reference/what-applicants-need-to-do.aspx> for specific instructions.

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