

November 13, 2019

To: Federal Communications Commission
Wireline Competition Bureau and Office of the Managing Director

From: Claire O'Flaherty, E-rate Expertise, Inc., 253-320-0664, claire@erateexpertise.com

Re: Public Comments on Improving FCC Form 470 Drop-Down Menu
WC Docket No. 13-184

I would like to suggest that the FCC consider taking a fresh look at the 470 form rather than try to clarify what is already on the form and to anticipate all of the potential options that might occur. At this point, there is so much cross-over between your options that your statistics must be skewed because there are so many options that an applicant could consider. Any text and options added to the form should pass a litmus test of "Is this REALLY necessary?" and "Will we REALLY use the information collected?".

Please consider having a few basic checkbox options for Category 1 that simply include:

Number of Locations: [Enter Number]

Type of Service (Check one):

- WAN
- Internet
- Both

Type of Circuit (Check all that apply):

- Fiber (Lit)
- Fiber (Dark)
- Cable/DSL
- Other (add other types only if you honestly think you will use data for that level of detail, also may add a narrative field to list the type of circuit for the Other Option)

Speed Range (Check all that apply):

[For speeds, create a drop-down with RANGES of speeds since not all speeds can be anticipated or accurately reflected to match what exists or is in RFPs. Simplify the ranges as much as possible.]

- Minimum Speed: [Drop Down options: 0-100 Mb, 100 Mb – 1G, 1G-10G, >10G]
- Maximum Speed: [Drop Down options: 0-100 Mb, 100 Mb – 1G, 1G-10G, >10G]

Internet Architecture (Check all that apply):

- Direct internet connections to each location
- Internet through Central Hub(s), then traveling through WAN to other locations

Infrastructure (Check all that apply):

- Lease for existing lines currently owned by Service Provider up to the applicant property line (some installation costs may be required)
- Special Construction for lines to be built and Owned by Service Provider
- Self-Provisioned lines that would be built by Service Provider and Owned by Applicant

Then, instead of trying to program the forms to automatically force compliance with regulations such as reviewing lit fiber options if you are evaluating dark fiber or self-provisioned networks, you could state the rules as part of a certification checkbox on these screens. For example:

- I acknowledge that requests for dark fiber, special construction and self-provisioned network bids require acceptance and evaluation of lit fiber options.