

Schools and Libraries Committee

Briefing Book

October 25, 2021

11:15 - 12:15 p.m. Eastern Time

Available for Public Use

Universal Service Administrative Company

700 12th Street NW, Suite 900

Washington, DC, 20005

Universal Service Administrative Company Schools & Libraries Committee Quarterly Meeting Agenda

Monday, October 25, 2021 11:15 a.m. – 12:15 p.m. Eastern Time USAC Offices 700 12th Street, N.W., Suite 900 Washington, D.C. 20005

| | | OPEN SESSION | Estimated Duration in Minutes |
|----------|-----|--|-------------------------------------|
| Chair | a1. | Consent Items (each available for discussion upon request): A. Approval of Schools and Libraries Committee Meeting Minutes of July 26, 2021 B. Approval of moving all <i>Executive Session</i> items into Executive Session | 5 |
| Craig | a2. | Approval of Schools and Libraries Support Mechanism 1st Quarter 2022 Programmatic Budget and Demand Projection for the November 2, 2021 FCC Filing | 5 |
| Craig | а3. | Consideration of Funding Year 2022 Filing Window Dates | 5 |
| Teleshia | i1. | Information on Three USAC Audit and Assurance Division Schools and Libraries Support Mechanism Beneficiary Audit Reports (For Information Only) | _ |
| Craig | i2. | E-rate Business Update Accomplishments Metrics Funding Year 2022 Readiness Systems Update Roadmap | 20 |

| EXECUTIVE SESSION Confidential – Executive Session Recommended | | | |
|---|-----|---|---|
| Craig | i3. | E-rate Business Update (Continued, if needed) | 5 |
| Chris | a4. | Consideration to Exercise Option Year for Schools & Libraries Program Business Process Outsourcing Services | 5 |

Next Scheduled USAC Schools & Libraries Committee Meeting

Monday, January 24, 2022 10:00 a.m. – 11:30 a.m. Eastern Time USAC Offices, Washington, D.C.

Universal Service Administrative Company Schools & Libraries Committee Meeting

ACTION ITEM

Consent Items

Action Requested

The Schools & Libraries Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the consent items listed below.

Discussion

The Committee is requested to approve the following items using the consent resolution below:

- A. Approval of Committee meeting minutes of July 26, 2021 (see Attachment A-1).
- B. Approval of moving all *Executive Session* items into *Executive Session*:
 - (1) **i3** E-rate Business Update (Continued, if needed). USAC management recommends that this item be discussed in Executive Session because it may relate to specific internal controls or confidential company data and internal rules and procedures concerning the administration of the universal service support mechanisms, where discussion of the matter in open session would result in disclosure of confidential techniques and procedures that would compromise program integrity.
 - (2) **a4** Consideration to Exercise Option Year for Schools & Libraries Program Business Process Outsourcing Services. USAC management recommends that this item be discussed in *Executive Session* because it relates to USAC's *procurement strategy and contract administration*.

Upon request of a Committee member, the above items are available for discussion by the Committee.

Recommended USAC Schools & Libraries Committee Action

APPROVAL OF THE FOLLOWING RESOLUTION:

RESOLVED, that the Schools & Libraries Committee of the USAC Board of Directors hereby approves: (1) the Committee meeting minutes of July 26, 2021; and (2) discussion in *Executive Session* of the items noted above.

ACTION Item #aSL01 10/25/2021 Attachment A-1 Meeting Minutes of 07/26/2021 Page 1 of 4

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY 700 12th Street, N.W., Suite 900 Washington, D.C. 20005

SCHOOLS & LIBRARIES COMMITTEE MEETING Monday, July 26, 2021

(DRAFT) MINUTES¹

The quarterly meeting of the Schools & Libraries Committee (Committee) of the USAC Board of Directors (Board) held at USAC's offices in Washington, D.C. on Monday, July 26, 2021. A virtual meeting platform was available to the general public for *Open Session* to accommodate the need for increased physical distancing on site due to the COVID-19 pandemic. Dr. Dan Domenech, Committee Chair, called the meeting to order at 10:02 a.m. Eastern Time, with a quorum of all nine Committee members present:

Buzacott, Alan

Choroser, Beth – by telephone

Domenech, Dr. Dan – Chair

Fontana, Brent – by telephone

Gregory, Amber – by telephone

Mason, Ken

Schell, Julie Tritt – Vice Chair

Sekar, Radha – Chief Executive Officer

Wade, Dr. Joan

Other Board members and officers of the corporation present:

Beyerhelm, Chris – Chief Administrative Officer – by telephone

Davis, Craig – Vice President of Schools and Libraries

Delmar, Teleshia – Vice President of Audit and Assurance – by telephone

Feiss, Geoff – Member of the Board

Gaither, Victor – Vice President of High Cost – by telephone

Garber, Michelle – Vice President of Enterprise Resources Program and Acting Vice President of Shared Services – *by telephone*

Gillan, Joe – Member of the Board

Hutchinson, Kyle – Vice President of IT and Chief Information Officer – *by telephone*

Morning, Kimberly – Acting Vice President and General Counsel, and Assistant Secretary

Salvator, Charles – Vice President, Chief Financial Officer, and Assistant Treasurer – *by telephone*

Skrivan, Michael – Member of the Board

¹ Draft resolutions were presented to the Committee prior to the Committee meeting. Where appropriate, non-substantive changes have been made to the resolutions set forth herein to clarify language, where necessary, or to correct grammatical or spelling errors.

Sweeney, Mark – Vice President of Rural Health Care – *by telephone* Wein, Olivia – Member of the Board Wibberly, Dr. Kathy – Member of the Board

Others present:

| <u>NAME</u> | <u>COMPANY</u> |
|---------------------------------------|-------------------------------------|
| Carlin, Tyler – by telephone | KPMG |
| Glisson, Connor – <i>by telephone</i> | USAC |
| Kriete, Debra – <i>by telephone</i> | State E-Rate Coordinators' Alliance |
| Lee, James – by telephone | USAC |
| LeNard, David – by telephone | E-Rate Elite Services, Inc. |
| Mitchell, Tamika- by telephone | USAC |
| Nuzzo, Patsy | USAC |
| Pace, Regina – by telephone | USAC |
| Phillippi, Megan | USAC |
| Rovetto, Edward – <i>by telephone</i> | USAC |
| Tiwari, Tanya | USAC |

OPEN SESSION

All materials from *Open Session* can be found on the USAC website.

- **a1.** Consent Items. Dr. Domenech presented this item for consideration.
 - **A.** Approval of Schools and Libraries Committee Minutes of April 26 and April 27, 2021.
 - **B.** Approval of moving all *Executive Session* items into *Executive Session*:
 - (1) i3 E-rate Business Update (Continued, if needed). USAC management recommends that this item be discussed in Executive Session because it relates to specific internal controls or confidential company data and internal rules and procedures concerning the administration of the universal service support mechanisms; discussion of the matter in Open Session would result in disclosure of confidential techniques and procedures that would compromise program integrity.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolution:

RESOLVED, that the Schools & Libraries Committee of the USAC Board of Directors hereby approves: (1) the Committee meeting

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minutes of April 26 and April 27, 2021; and (2) discussion in *Executive Session* of the item noted above.

Approval of Schools and Libraries Support Mechanism 4th Quarter 2021 **Programmatic Budget and Demand Projection for the August 2, 2021 FCC Filing.** Mr. Davis presented this item for consideration. The presentation included a written report on USAC management's recommendations for the Schools and Libraries Support Mechanism 4th Quarter 2021 programmatic budget and demand projection for the August 2, 2021 FCC Filing.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolutions:

RESOLVED, that the USAC Schools and Libraries Committee approves a 4th Quarter 2021 Schools and Libraries Support Mechanism direct program budget of \$10.87 million; and

RESOLVED FURTHER, that the USAC Schools and Libraries Committee directs USAC staff to submit a collection requirement of \$10.87 million for Schools and Libraries Support Mechanism administrative costs in the required August 2, 2021 filing to the FCC on behalf of the Committee; and

RESOLVED FURTHER, that the USAC Schools and Libraries Committee, having reviewed at its meeting on July 26, 2021 the 4th Quarter 2021 Schools and Libraries Support Mechanism demand estimate of \$594.14 million, hereby directs USAC staff to proceed with the required August 2, 2021 filing to the FCC on behalf of the Committee. USAC staff may make adjustments if the total variance for the Schools and Libraries Support Mechanism is equal to or less than \$10 million, or may seek approval from the Committee Chair to make adjustments if the total variance is greater than \$10 million, but not more than \$15 million.

- i1. Information on Four USAC Audit and Assurance Division Schools and Libraries Support Mechanism Beneficiary Audit Reports. This item was provided for information purposes only. Dr. Domenech noted that the Schools and Libraries Audit Briefing Book would be made public and posted to the USAC website.
- **i2. E-Rate Business Update.** Mr. Davis presented PowerPoint slides covering the following items to the Committee:
 - Recap from April Committee Meeting
 - Accomplishments
 - Metrics
 - Plans for Next Quarter

ACTION Item #aSL01 10/25/2021 Attachment A-1 Meeting Minutes of 07/26/2021 Page 4 of 4

- Systems Update
- Roadmap
- **i3. E-rate Business Update** (*Continued*). The committee determined that continued discussion in *Executive Session* was not needed.

Dr. Domenech noted that during the school year millions of students received little or no instruction due to the lack of technology, but with additional funding, support for remote learning could be provided.

On a motion duly made and seconded, the Committee adjourned at 10:33 a.m. Eastern Time.

/s/ Kimberly Morning Assistant Secretary

Universal Service Administrative Company Schools & Libraries Committee Meeting

ACTION ITEM

Approval of Schools and Libraries Support Mechanism 1st Quarter 2022 Programmatic Budget and Demand Projection for the November 2, 2021 FCC Filing

Action Requested

The Schools & Libraries Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the 1st Quarter 2022 (1Q2022) programmatic budget and demand projection for the Schools and Libraries Support Mechanism for submission to the Federal Communications Commission (FCC) in USAC's November 2, 2021 quarterly filing.

Discussion

On a quarterly basis, USAC is required to submit to the FCC each program's budget¹ and projected demand for the upcoming quarter.²

Funding Requirement

USAC estimates the 1Q2022 funding requirement for the Schools and Libraries Support Mechanism as follows:

¹ See 47 C.F.R. § 54.715(c).

² See 47 C.F.R. § 54.709(a)(3).

Table A. Program Funding Requirement

| (· · ·11· · · | 402021 | Increase/ | 102022 | 3 .74 |
|--------------------------------------|------------|---------------|-----------|--------------|
| (in millions) | 4Q2021 | (Decrease) | 1Q2022 | Notes |
| Steady State: | | | | |
| Program Funding Requirement | \$573.39 | \$0.00 | \$573.39 | See Note 1 |
| | | | | and Table B |
| New Requirements: | | | | |
| N/A | 0.00 | 0.00 | 0.00 | |
| Total Program Funding | \$573.39 | \$0.00 | \$573.39 | |
| Requirement | | | | |
| Prior Period Adjustments (difference | between pr | ojections and | actuals): | |
| Billings | 5.61 | 45.24 | 50.85 | |
| Interest Income | (0.01) | 0.01 | 0.00 | |
| Bad Debt Expense | (5.15) | (0.12) | (5.27) | |
| Total Prior Period Adjustments | 0.45 | 45.13 | 45.58 | |
| USAC Administrative Expenses | 20.30 | (1.32) | 18.98 | See Table C |
| Total Funding Requirement | \$594.14 | \$43.81 | \$637.95 | |

Note 1: The Program Funding Requirement represents one quarter of the total funding requirement for Funding Year 2021 of \$2,793.54 million, less \$500 million available to carry forward to meet demand for Funding Year 2021. *See* Table B below for additional detail.

Note 2: Table B is an annual schedule that is updated once a year for the April Board meeting.

Table B. Funding Year 2021 Program Funding Requirement and Roll Forward

| (in millions) | Fund Year 2021 |
|--|----------------|
| Total Requested (In Window) | \$3,027.23 |
| Decrease for Denials/Cancellations (based on 5 yr average) | (346.74) |
| Increase for Out of Window Apps (based on 5 yr average) | 113.05 |
| Estimated Demand | \$2,793.54 |
| | |
| Less Roll Forward | |
| Available Funds from Prior Fund Year | \$2,813.05 |
| Disbursements | (2,173.59) |
| Reserved Funds, Net Change | |
| a. Pending Applications to Process | (10.63) |
| b. Unliquidated Obligations (ULOs) | (154.90) |
| c. Appeals Reserve - USAC Appeals | (19.71) |
| d. Appeals Reserve - FCC Appeals | (26.25) |
| e. Unpaid Invoices | 72.03 |
| Total Roll Forward | \$500.00 |
| Funding Year 2021 Collection Requirement | \$2,293.54 |

Based on projected burn rate, USAC estimates the following 1Q2022 programmatic budget:

Table C. Quarterly Programmatic Budget

| (in millions) | 4Q2021 Budget | Increase/ Decrease | 1Q2022 Budget | Notes |
|------------------------------------|------------------|-----------------------|------------------|------------|
| Direct Program Costs | | | | |
| Employee Expenses | \$2.39 | (\$0.33) | \$2.06 | |
| Professional Services | 3.78 | 0.18 | 3.96 | |
| General & Administrative | 0.00 | 0.00 | 0.00 | See Note 3 |
| Total Direct Program Costs | \$6.17 | (\$0.15) | \$6.02 | |
| Direct Assigned Costs | | | | |
| Employee Expenses | \$1.03 | (\$0.22) | \$0.81 | |
| Professional Services | 3.07 | 0.26 | 3.33 | |
| General & Administrative | 0.60 | 0.03 | 0.63 | See Note 3 |
| Total Direct Assigned Costs | \$4.70 | \$0.07 | \$4.77 | |
| Total Direct Program & | \$10.87 | (\$0.08) | \$10.79 | |
| Direct Assigned Costs | | | | |
| Common Allocated Costs | \$9.43 | (\$1.24) | \$8.19 | |
| Total Programmatic Budget | \$20.30 | (\$1.32) | \$18.98 | |

Note 3: General & Administrative expenses include computer support & maintenance and meetings & conferences.

A comparison of actual expenditures to the budget for the nine months ending September 30, 2021 is provided in **Attachment 1.**

Recommendation

USAC management recommends that the Committee approve the 1Q2022 budget and projection of demand as proposed.

Recommended Schools & Libraries Committee Actions

APPROVAL OF THE FOLLOWING RESOLUTIONS:

RESOLVED, that the USAC Schools & Libraries Committee approves a 1st Quarter 2022 Schools and Libraries Support Mechanism direct program budget of \$10.79 million; and

RESOLVED FURTHER, that the USAC Schools & Libraries Committee directs USAC staff to submit a collection requirement of \$10.79 million for Schools and Libraries Support Mechanism administrative costs in the required November 2, 2021 filing to the Federal Communications Commission on behalf of the Committee; and

RESOLVED FURTHER, that the USAC Schools & Libraries Committee, having reviewed at its meeting on October 25, 2021 the 1st Quarter 2022 Schools and Libraries Support Mechanism demand estimate of \$637.95 million, hereby directs USAC staff to proceed with the required November 2, 2021 filing to the Federal Communications Commission on behalf of the Committee. USAC staff may make adjustments if the total variance for the Schools and Libraries Support Mechanism is equal to or less than \$10 million, or may seek approval from the Committee Chair to make adjustments if the total variance is greater than \$10 million, but not more than \$15 million.

ATTACHMENT 1

Schools and Libraries Administrative Costs and Headcount

Comparison of Actual Expenditures and Headcount to the Budget for the Nine Months Ending September 30, 2021

| | FTE | FTE | FTE | YTD | YTD | |
|---|--------|--------|----------|---------|---------|----------|
| (\$ in millions) | Actual | Budget | Variance | Actual | Budget | Variance |
| Direct Program Costs | | | | | | |
| Employee Expenses | 55 | 61 | 6 | \$5.51 | \$6.46 | \$0.95 |
| Professional Services (Note 4) | | | | 11.37 | 11.34 | (0.03) |
| General & Administrative (Note 5) | | | | 0.00 | 0.00 | 0.00 |
| Total Direct Program Costs | | | | \$16.88 | \$17.80 | \$0.92 |
| Direct Assigned Costs | | | | | | |
| Employee Expenses | 18 | 21 | 3 | \$1.82 | \$2.75 | \$0.93 |
| Professional Services (Note 4) | | | | 6.96 | 10.56 | 3.60 |
| General & Administrative (Note 5) | | | | 1.82 | 1.77 | (0.05) |
| Total Direct Assigned Costs | | | | \$10.60 | \$15.08 | \$4.48 |
| Total Direct Program & Direct Assigned Costs | 73 | 82 | 9 | \$27.48 | \$32.88 | \$5.40 |
| Common Allocated Costs (Note 6) | | | | \$22.24 | \$26.53 | \$4.29 |
| Total Programmatic Budget | | | | \$49.72 | \$59.41 | \$9.69 |

- **Note 4:** Direct Program Professional Services include Business Process Outsourcing (BPO) and Project Management Office (PMO) contracts. Direct Assigned Professional Services include E-Rate Productivity Center (EPC) operations & maintenance, beneficiary & contributor audit program audits, and IT contract labor.
- **Note 5:** General & Administrative expenses include computer support & maintenance, printing & postage, and meetings & conferences.
- **Note 6:** Common costs include costs not directly attributable to a program and are allocated based on the Cost Allocation Methodology, which allocates costs based 50% on direct program costs in the prior year and 50% on program demand in the prior year. Actual common allocated costs reflect a reduction for costs allocated to the appropriated programs.

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Universal Service Administrative Company Schools & Libraries Committee Meeting

ACTION ITEM

Consideration of Funding Year 2022 Filing Window Dates

Action Requested

The Schools & Libraries Committee (Committee) of the USAC Board of Directors (Board) is requested to authorize USAC to open the Funding Year (FY) 2022 application filing window no earlier than January 2022, and to close the window no earlier than March 2022.

Discussion

A FY2022 filing window opening no earlier than January 2022 and closing no earlier than March 2022 will provide a reasonable time period for applicants to submit their FCC Form 471 funding applications. The application filing window has typically been opened in the first quarter of the calendar year, which strikes a balance between giving applicants time to complete their competitive bidding reviews while providing USAC time to review the applications so that funding decisions can be issued before the school year starts. We used this same timeframe for FY2021, and USAC was able to issue funding commitments for over 95% of workable applications by September 1, 2021. While many factors played a role in the timely issuance of decisions, a key factor in past funding years was opening and closing the application filing window in the first quarter.

USAC is requesting approval to open the FY2022 application filing window no earlier than January 2022, and to close the window no earlier than March 2022. This timeframe aligns with the Application Filing Window dates over the past few years and will help USAC to issue timely funding commitments.

Section 54.502(e) of the Federal Communications Commission's (FCC) rules mandates that the filing window cannot open until sixty (60) days after the release of the Eligible Services List (ESL) by the FCC.¹ The FCC issued a public notice seeking comments on the proposed Funding Year 2022 ESL on August 27, 2021.² The FCC had not issued the FY 2022 ESL as of October 7, 2021.

USAC management recommends that the Committee approve the requests discussed in this briefing paper, subject to the requirements of Section 54.502(e) of the Commission's rules.

¹ See 47 C.F.R. § 54.502(e).

² See Wireline Competition Bureau Seeks Comment on Proposed Eligible Services List for the E-Rate Program, WC Docket No. 13-184, Public Notice, DA 21-1062 (WCB Aug. 27, 2021).

Recommended Schools & Libraries Committee Action

APPROVAL OF THE FOLLOWING RESOLUTIONS:

RESOLVED, that the USAC Schools & Libraries Committee accepts the recommendation of USAC management to open the Funding Year 2022 filing window no earlier than January 2022 and to close the Funding Year 2022 filing window no earlier than March 2022, subject to the requirements of Section 54.502(e) of the Commission's rules; and

RESOLVED FURTHER, that upon consultation with the Committee Chair, USAC management is authorized to adjust the Funding Year 2022 filing window opening and closing dates, as circumstances may warrant.



Schools & Libraries Committee Meeting

E-rate Business Update

Open Session

October 25, 2021

Agenda

- Accomplishments
- Metrics
- FY2022 Readiness
- Systems Update
- Roadmap

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Accomplishments

- Achieved 95.7 percent completion of FY2021 applications by Sept. 1.
 - Reviewed 80.5 percent of requested dollars.
 - Completed 89 percent of Fiber apps (962 of 1,084); reviewed 66 percent of requested dollars (\$214 million of \$322 million).
 - Completed 82 percent of Consortium apps (1,320 of 1,614); reviewed 48 percent of requested dollars (\$204 million of \$426 million).
- Authorized disbursements of \$576 million for over 65,700 invoice lines for all funding years in 3Q2021.

Data as of September 30, 2021.

Metrics

| | | Total Applications Received | Dollars Submitted (millions) | Total Applications Processed | Dollars Reviewed (millions) | Dollars Committed (millions) | Percentage Complete | Workable Aging > 90 Days |
|---------------|-------------|-----------------------------------|------------------------------------|------------------------------------|------------------------------------|---|------------------------|--------------------------------|
| | FY2021 | 36,376 | \$3,108 | 34,672 | \$2,492 | \$2,259 | 95.3 | 1,645 |
| Commitments | FY2020* | 40,938 | \$3,054 | 40,485 | \$2,809 | \$2,380 | 98.9 | 296 |
| | FY2016-2019 | 158,533 | \$12,669 | 158,345 | \$12,659 | \$9,806 | 99.9 | 16 |
| | | Total Invoices Received | Dollars Submitted (millions) | Total Invoices Processed | Dollars Processed (millions) | Workable Dollars Outstanding (millions) | Percentage Complete | Workable Aging > 90 Days |
| | CY2021 | 68,358 | \$1,815 | 63,245 | \$1,561 | \$117 | 92.5 | 1,339 |
| Disbursements | CY2020 | 86,326 | \$2,349 | 85,284 | \$2,039 | \$8.6 | 98.8 | 630 |
| | CY2016-2019 | 522,717 | \$11,714 | 519,997 | \$9,288 | \$3.9 | 99.5 | 229 |
| | | Total Received | Dollars Submitted (millions) | Total Appeals Processed | Dollars Processed (millions) | Percentage Cor | • | able Aging > 90 Days |
| Appeals | FY2016-2021 | 15,601 | \$2,177 | 15,176 | \$1,563 | 97.3 | | 2,128 |

Note: *FY2020 includes Window 1 and Window 2 (COVID-19) applications.

Data as of September 30, 2021.

FY2022 Readiness

FY2022 FCC Form 471 Filing Window Preparations

- Open Administrative Window ahead of FY2022 window to allow for entity updates
- Category 2 (C2) Budget enhancements for FY2022
- EPC and Legacy systems update for FY2022

Training & Outreach

Conduct live remote training for FY2022 in fourth quarter

Administrative Preparations

- Eligible Services List
- PIA Procedures
- Window Date Approvals

5

Systems Update

E-rate IT High-Level Project Status

Completed

• **MFA for BEAR Pin Removal:** Removed PIN requirement and any subsidiary PIN associated tools from the FCC Form 472. Deployed July 8.

6

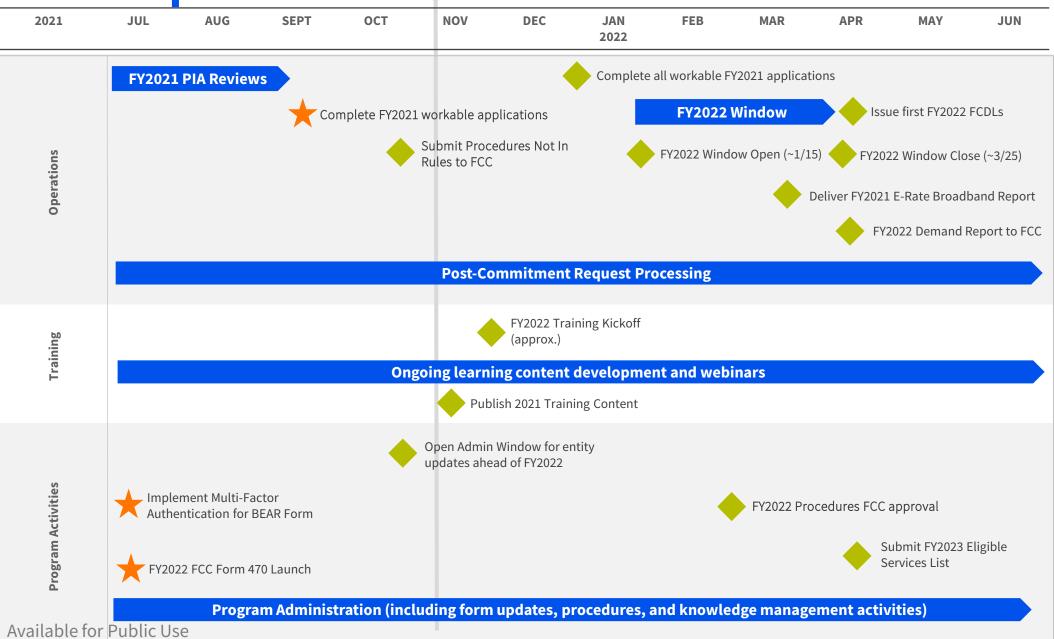
Systems Update (Continued)

E-rate IT High-Level Project Status

| Active Projects | Project Status | Target Production Date | Project Updates & Risks |
|---|----------------|---------------------------------------|---|
| C2 Budget Recalculations: Enable budgeted entities to request or cancel a new budget and update C2 budget recalculation accordingly. | On-Track | October 8, 2021; December 10, 2021 | This project is currently in testing. |
| EPC Updates: Automation and control improvements for E-rate application reviews. | On-Track | December 2021 | This project is currently in development. |

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Roadmap





Appendix A: Glossary of Terms

| Term | Definition | | |
|------|--|--|--|
| BEAR | Billed Entity Applicant Reimbursement (FCC Form 472) | | |
| BMIC | Basic Maintenance of Internal Connections | | |
| C1 | Category One services (Data transmission and Internet access services) | | |
| C2 | Category Two services (Internal connections, BMIC, MIBS) | | |
| CY | Calendar Year | | |
| EPC | E-rate Productivity Center | | |
| FCDL | Funding Commitment Decision Letter | | |
| FRN | Funding Request Number | | |

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Appendix A: Glossary of Terms (Continued)

| Term | Definition |
|------|--|
| FY | Funding Year |
| IC | Internal Connections |
| MFA | Multi-Factor Authentication |
| MIBS | Managed Internet Broadband Services |
| PIA | Program Integrity Assurance |
| SPAC | Service Provider Annual Certification (FCC Form 473) |
| SPIN | Service Provider Identification Number |
| UAT | User Acceptance Testing |

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