Schools and Libraries (E-rate) Program

EPC User Guide: Service Substitutions

TABLE OF CONTENTS

SCHOOLS AND LIBRARIES (E-RATE) PROGRAM

Submitting Service Substitution Requests

Purpose of Service Substitutions

A service substitution is a change in the products and/or services specified in the FCC Form 471, Description of Services Ordered and Certification Form. In certain limited circumstances, applicants or service providers may request and be approved for service substitutions. In addition, service providers or equipment manufacturers may submit a "global" service substitution.

Service substitutions encompass changes in the technical components (whether products or services or both) specified in the FCC Form 471 Funding Request Number (FRN). Applicants who file service substitution requests must still comply with the deadlines for the FCC Form 486, Receipt of Service Confirmation and Children's Internet Protection Act Certification Form.

Criteria

Substitution of a service or product must meet the following conditions, which are specified in Federal Communications Commission (FCC) rules:

- The substituted services or products have the same functionality as the services or products contained in the original proposal.
- The substitution does not violate any contract provisions or state or local procurement laws.
- The substitution does not result in an increase in the percentage of ineligible services or functions.
- The requested change is within the scope of the establishing FCC Form 470, including any Requests for Proposal (RFP), for the original service.

If a service substitution results in a change in the pre-discount price for the supported service, E-rate Program funding will be based on the pre-discount price of the service for which support was originally requested or the pre-discount price of the new, substituted service, whichever is lower.

Example

USAC can approve an applicant's request to use 87 six-port network modules instead of a different brand of 58 eight-port network modules that were originally approved in the applicant's FCC Form 471.

Who Must File

A full-rights user in the E-rate Productivity Center (EPC) who represents a school district, library system, or consortium of multiple entities can file a service substitution request.

When to File a Service Substitution

You should submit your service substitution requests after you receive a FCC Form 471 Receipt Acknowledgment Letter (RAL), and no sooner. USAC will dismiss any requests received prior to issuance of a RAL. If USAC has not completed the services portion of its review of the funding request when the substitution request is logged, then USAC will include the substitution request in the funding request review.

The Funding Commitment Decision Letter (FCDL) includes a notation that USAC has incorporated the substitution request. If USAC has completed the services portion of its funding request review, we will review and act on the substitution request separately.

USAC must receive a service substitution request on or before the last day to receive service for that FRN. In general, the last day to receive service is:

- June 30 of the relevant funding year for recurring services, and
- September 30 that follows the close of the funding year for non-recurring services.

However, the deadline for the receipt of non-recurring services may be extended beyond the September 30 that follows the close of the funding year. If the deadline for receipt of these services is extended, the deadline for the service substitution request is automatically extended as well.

If subsequent corrections to a service substitution are necessary, applicants and service providers must follow the normal service substitution procedures and timelines in order to obtain pre-approval of changes. If USAC finds an unapproved change during the invoice review process, USAC may refuse to pay the invoice for products or services not originally requested. Furthermore, if, during an audit, USAC discovers different products or services from those approved, USAC may make a commitment adjustment and require that you return incorrectly disbursed funds.

If the applicant discovers that products or services delivered are different from those approved on the FCC Form 471, the applicant should file a correcting service substitution even if the discovery occurs after the last day to receive service. To ensure that a late-filed request is processed, applicants should prominently indicate that the request is a "correcting service substitution." However, applicants are strongly encouraged to file traditional and timely service substitutions when making changes in products and services, whenever possible.

Where to File

You must file your service substitution requests online in the E-rate Productivity Center (EPC). Please review the instructions in this guide to learn how to file a service substitution request for Funding Years (FY) 2016 and forward, and FY2015 and previous years.

Assistance

If you have any questions about filing a service substitution request, please contact the E-rate Program's Client Service Bureau (CSB) at (888) 203-8100.

You may call CSB between 8:00 AM and 8:00 PM ET on weekdays for more information on how to complete this or other universal service forms. Information is also available on the USAC website.

Instructions for FY2016 and Forward

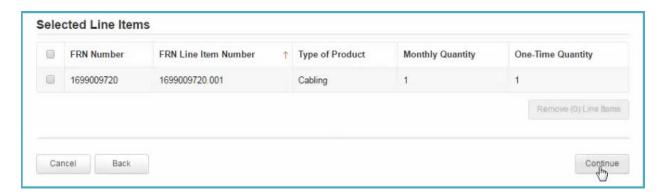## EPC Navigation within the Service Substitution Request

Progress Bar

The progress bar appears on every screen of the service substitution request so you can track your progress.

Continue, Back and Cancel Buttons

At the bottom of every screen, you are given three options. These will allow you to continue working on the request; return to a previous section of the request; or to discard the form altogether.

- If you select **Continue** you will proceed to the next page to continue entering information for your request.
- If you select **Back**, you will be taken back one screen.
- If you select **Cancel**, the entire service substitution request will be discarded. Once you confirm that you want to discard your request, it will no longer be available in our system.

Yes/No Buttons

When you are answering a Yes or No question in the form, the **Yes** or **No** button that you select will be displayed in green.

To change your answer:

1. Click the green button to deselect it (it will turn gray).
2. You can then select the correct response.

Exiting the Service Substitution Request and Returning Later

If, after completing part of the request, you want to save your work and return to it later, click the **Save Changes** link in the left-hand margin.
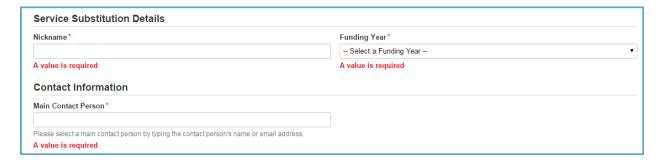

When you return, go to the **Task** tab to find the unfinished request.

If you click on the task, your service substitution request will open back up where you left off.

Red System Prompts

While you are filling out your form, you may receive system messages in red which provide information about data validation or mandatory fields.

Create a Service Substitution Request

1. Log in to EPC.
2. Select the **Service Substitution** link from the upper right menu on your landing page.
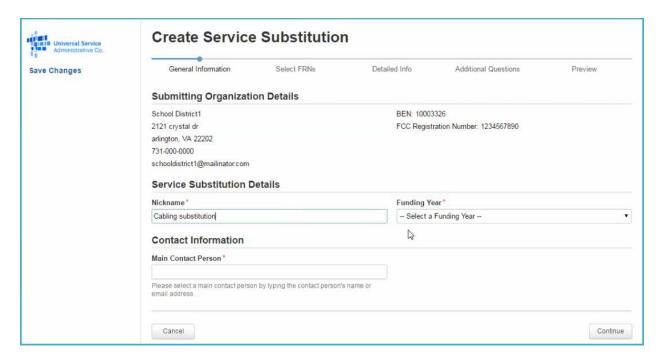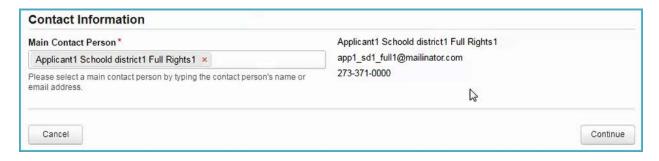

General Information

When you begin your service substitution request, the basic information about your billed entity, including your Billed Entity Number (BEN), organization name, and address will automatically populate from your profile.

If any of this information is incorrect, the Account Administrator for your organization should update the organization's profile. Once the information has been updated, it will automatically be updated in the request as well. For assistance with updating the organization's profile, see the **Manage Organizations** EPC user guide.

1. Enter a **Nickname** of your choosing for this request. This nickname will facilitate communication about this submission with USAC. Choose the nickname using identifiers that suit your own record keeping needs. The nickname can be very simple; for example, you may want to include the type of service you are changing in the nickname.
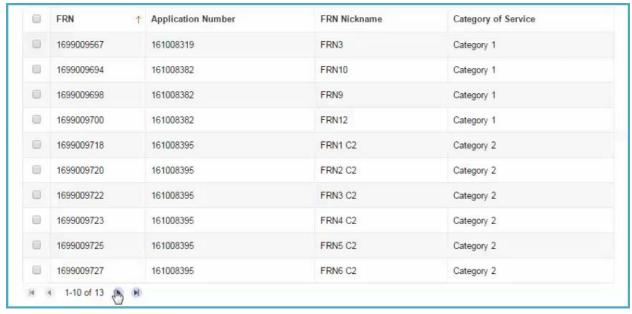
3. Select the appropriate **Funding Year** from the dropdown menu.
4. Enter the **Main Contact Person** name. When you begin typing the name a list of names will appear.
5. Select the correct name and the person's information will appear on the screen.
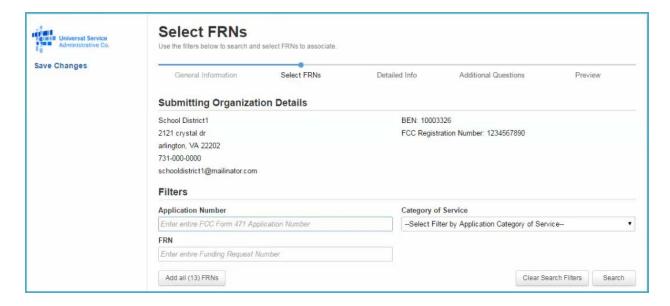6. Click **Continue** to proceed.

Select FRNs

On this page all of your committed FRNs for the funding year you chose will appear in a grid on this page. If you have more than 10 FRNs, you can use the page function at the bottom of the grid to view the rest of your FRNs.

Filters

You can use the filters on this page to search and select Funding Request Numbers (FRNs) to associate with this service substitution request. You can filter by:

- **Application Number** - Enter your FCC Form 471 application number.
- **Category of Service** - Use the dropdown menu to select the Category of Service.
- **FRN** - Enter your FRN.

Choose one of the filter methods listed above and then click **Search** to filter your list of FRNs. To show all FRNs and clear the filtered results, click **Clear Search Filters**.
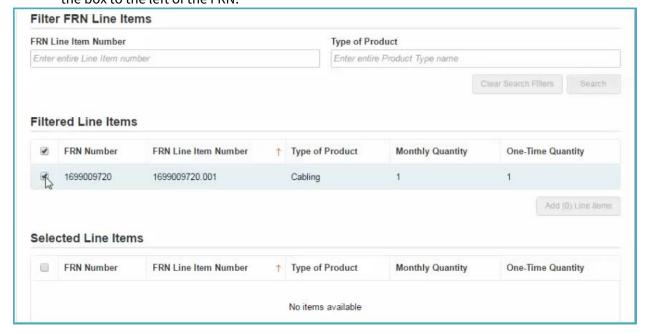
Add FRNs

1. Select the FRNs you want to add to the request by selecting the box to the left of each FRN. You can use the **Add all (#) FRNs** button if you want to add all of the FRNs displayed.
2. Click the **Add (#) FRNs** button to include the selected FRNs in your service substitution request. The **Selected FRNs** will be displayed in the next section of your request.

> **NOTE:** You can continue to add and remove FRNs by selecting the box to the left of an FRN and using the **Add (#) FRNs** and **Remove (#) FRNs** buttons.

Filter FRN Line Items

Applicants may have numerous FRN Line Items in their funding request. Those items will be listed in a grid. This filter allows you to view and select specific FRN Line Items. To use the filter function:

1. Enter the entire **FRN Line Item Number** in the field provided.
   OR
   Enter the entire name of the **Type of Product** in the field provided.
2. Click **Search**. To clear the filtered results, click **Clear Search Filters**.
3. Select the FRN Line Item(s) you want to add to the service substitution request by checking the box to the left of the FRN.
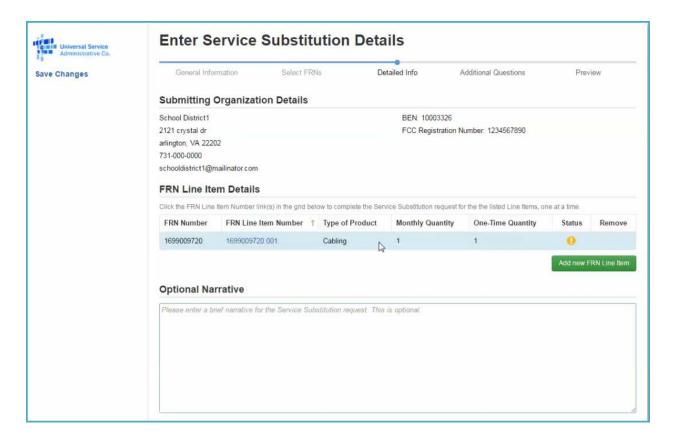

4. Click **Add (#) Line Items.** The FRN Line Items will be displayed in the **Selected Line Items** section of the request.

> **NOTE:** You can continue to add and remove FRN Line Items by selecting the box to the left of the FRN and using the **Add (#) Line Items** and **Remove (#) Line Items** buttons.

5. After you have added all of the FRN Line Items associated with the service substitution, click **Continue**.

Enter Service Substitution Details

1. Click the hyperlinked **FRN Line Item Number** in the grid to complete the service substitution request for the listed Line Items, one at a time.

> **NOTE:** Your completion status for adding detailed information about the FRN Line Item is listed to the right of the hyperlink.
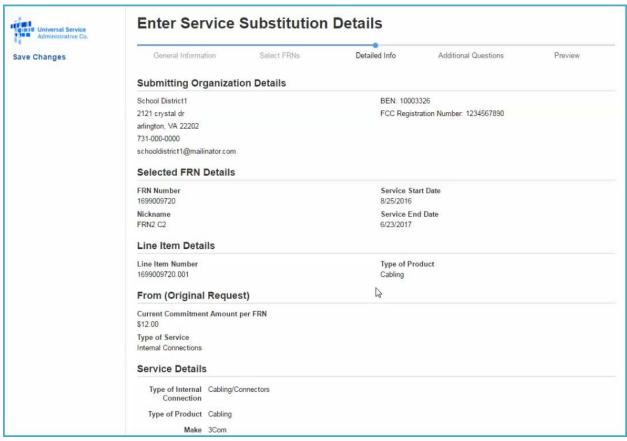>
> ⚠️ You will notice a yellow circle with an exclamation point when you need to add detailed information about the Line Item.
>
> ✅ When this task is complete, you will see a green circle with a checkmark.

On the next screen you will add more details about the service substitution.

From (Original Request)

2. Review the information provided about the original funding request associated with the selected FRN Line Item.
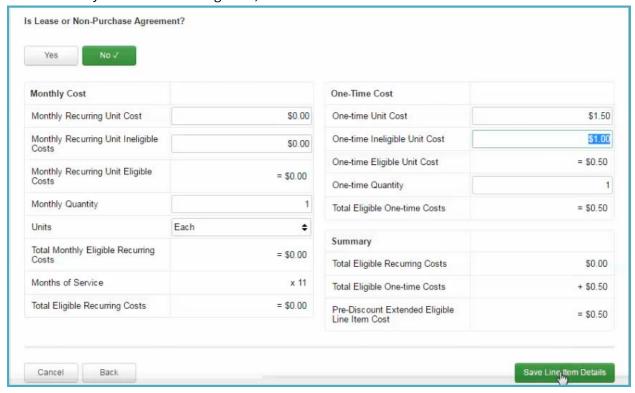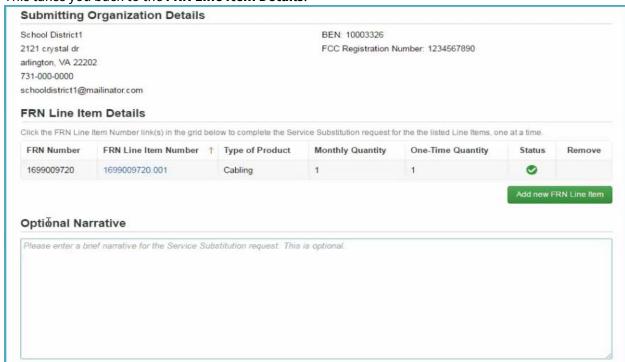

To (Service Substitution Request)

3. Change the **Type of Product** and **Make** and **Model** using the dropdown menus and data field provided.

4. If applicable, you can adjust the **Monthly Cost** using the fields provided. Note that you cannot increase the monthly cost.
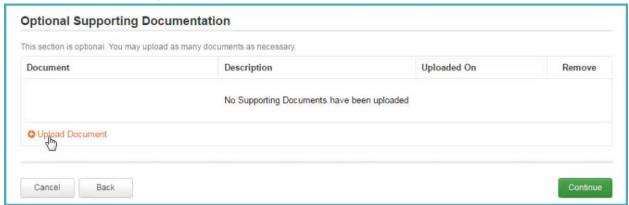5. When you are done making edits, click **Save Line Item Details**.

This takes you back to the **FRN Line Item Details**.

Optional Narrative

6. (Optional) Enter a brief description of your service substitution request in the data field provided. This field is not required.

Optional Supporting Documentation

7. (Optional) You may upload as many support documents as necessary to support your service substitution request by clicking the **Upload Document** link. This field is not required.
8. Once you are done adding the optional information (or if you choose not to provide it), click **Continue**.
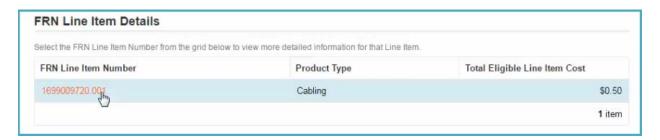
Additional Questions

1. Confirm the following statements by clicking **Yes** or **No**:

   - **The substituted products or services mentioned in the request have the same functionality as that contained in the original product.**

   - **The substitution does not violate any contract provisions or state or local procurement laws.**

   - **The substitution does not result in an increase in the percentage of ineligible services or functions, that the requested change is consistent within the scope of the establishing FCC Form 470, including any Requests for Proposal for the original services.**

> **NOTE:** If you answer your answer to any of the above questions is **No**, you will be asked to provide additional information during the review of your request.
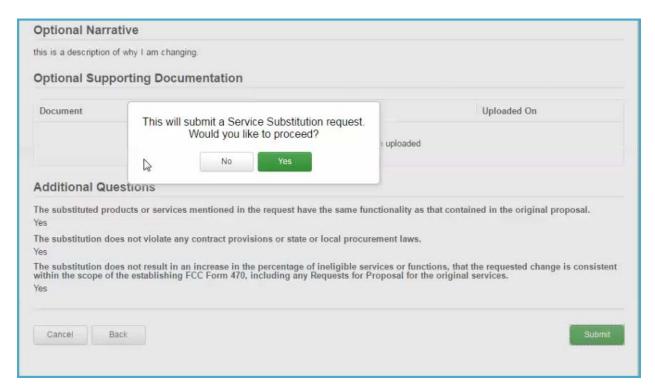
2. Click **Preview** to review your service substitution request before submitting it.

Preview

1. Review your service substitution request for accuracy.
2. Under **FRN Line Item Details**, click the hyperlinked **FRN Line Item Number** to see the information provided for each Line Item. You can make any necessary edits at this time. (Click **Back** to return to the full service substitution preview.)

3. (Optional) If you haven't already done so, at this time you have another opportunity to provide an **Optional Narrative** to support your request or upload **Optional Supporting Documentation**.
4. When you are done reviewing the request, click **Submit**.
5. A pop-up message will appear asking you to confirm your submission. Click **Yes** to submit your request.

Service Substitution Request Confirmation

You have successfully submitted your request! You will see a confirmation when you are taken back to the **Actions** section of your EPC account.

News

Go to your EPC account **News** to view your **Service Substitution Confirmation Letter**. This is an acknowledgment that we have received your service substitution, <u>not</u> an approval of the service substitution request. Please read this letter because it contains a list of next steps in the process.

There are record links at the bottom of the **Service Substitution Confirmation Letter** that will take you to the:
- Applicant Entity Record
- Service Provider Record(s)
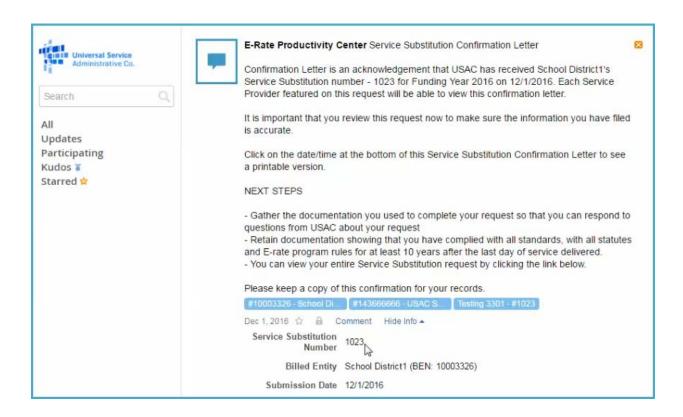- Service Substitution Record

Document Retention

FCC Rules require E-rate Program participants to [retain program documents](#) for a period of 10 years after the last date of the funding year or the last date of services, whichever is later.

1. Click the date at the bottom of the **Service Substitution Confirmation Letter**.

The system will produce a full view record which you can print out or save as a PDF for your records.

Records

You can also view your submitted service substitution request in the **Records** section of your EPC account.

Instructions for FY2015 and Previous Years

Applicants filing a service substitution request for FY2015 and previous years will need to attach their request to a customer service case in EPC.

Service Substitution Request

Create a service substitution request document and include the following information:

- Applicant name
- Billed Entity Number (BEN)
- FCC Form 471 application number
- Funding Request Number (FRN)
- Funding Request line item number (if the FRN contains multiple line items)
- Name of submitter
- Title of submitter
- Submitter phone number
- Submitter email address

The body of the service substitution request should contain this information:

- From and To list - A listing of the products and services originally approved for which changes are requested, and a similar listing of the products and services now desired. This is sometimes described as a "from" and "to" list.
  - For changes in physical equipment, the "from" and "to" should include manufacturer, model number, description/function, cost and quantity for each line item. For changes in services, the "from" and "to" should include the description/function, and cost for each line item.
- Original commitment amount per FRN line item (Note: Service substitutions are considered based on individual FRN line items)
- Revised commitment amount (if changed) - If the requested substitution involves a decrease in cost, the request should not only indicate a change in monthly recurring cost, if any, but also must provide a total pre-discount amount and the effective date of change, so that the funding commitment can be accurately adjusted.
  - If the requested substitution involves an increase in pre-discount cost of an eligible item, the request will be funded at the amount originally approved.
- The following certification verbatim: "I certify: that the substituted products or services have the same functionality as that contained in the original proposal, that the substitution does not violate any contract provisions or state or local procurement laws, that the substitution does not result in an increase in the percentage of ineligible services or functions, that the requested change is consistent within the scope of the establishing FCC Form 470, including any Requests for Proposal for the original services."

Create a Customer Service Case

1. Log in to EPC.
2. Select the **Contact Us** link from the upper right menu on your landing page.

Case Details

2. Enter a **Nickname** of your choosing for this request. This nickname will facilitate communication about this submission with USAC. Choose the nickname using identifiers that suit your own record keeping needs. The nickname can be very simple; for example, you may want to include the funding year and the type of service you are changing in the nickname.
3. Enter a brief description of your request in the **Description** field.

4. Choose **Post Commitment Changes** from the **Topic** dropdown menu.
5. Select **Service Substitution Questions** from the **Subtopic** dropdown menu.
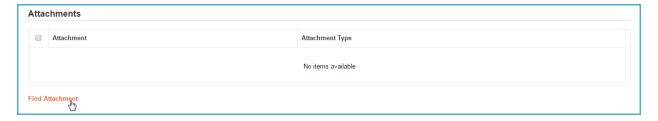6. Choose the appropriate priority level from the **Priority** dropdown menu.

7. Select **FCC Form 471** from the **Form Type** dropdown menu.
8. Enter the **Form Number** in the field provided.

NOTE: If your request affects multiple forms, be sure to include all of the FCC Form 471 application numbers in your attachment.

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9. Attach your service substitution request document by clicking the **Choose File** button.

   When you upload the document, its file name will appear in the **Document** section of your case. To remove the document, click the **X** located to the right of its file name.

Attachments

10. (Optional) If there is an associated customer service case you want to link to this request, click the **Find Attachment** link and use the dropdown menu to select **Customer Service Case**. A grid displaying your submitted customer service cases will appear.

    First, click the box next to the **Case #** and then click the **+Add Attachment(s)** link that appears. When you upload a supporting document into the field, its file name will appear in a grid.

    Click the **Hide Attachment Finder** link to hide the customer service case grid.

NOTE: To remove the link to an existing customer service case, click the box located to the right of its **Attachment** name. Then click the Remove link that appears above the attachment grid.

Case Contact

EPC will automatically select the account user who opened the customer service case as the **Case Contact**.

(Optional) To remove a **Case Contact**, click the **X** next to the name. You have two options for changing the contact person associated with the service substitution request. Click the circle in from of the option that applies to you:

- **I would like to choose a user in the system:** When you begin typing the name a list of names will appear based on your organization's profile. Select the correct name and the person's information will appear on the screen.

- **I would like to enter in a contact that is not in the system:** In the fields provided, enter the **First Name**, **Last Name**, **Phone** and **Email** for the contact person. Please note that, because this person is not in EPC, they will not receive any updates or communications about this case through EPC.

11. After the **Case Contact** is selected, click the **Submit** button to finish your submission.

NOTE: If you click the **Cancel** button, your request will be discarded.

Document Retention

FCC Rules require E-rate Program participants to [retain program documents](#) for a period of 10 years after the last date of the funding year or the last date of services, whichever is later.

Records

You can also view your submitted service substitution request in the **Records** section of your EPC account. Click the **Customer Service Case** link to see a list of the cases you submitted.