

Cybersecurity Pilot Program Questions

Getting Started

1. Can schools and libraries that do not currently participate in E-rate apply for the Cybersecurity Pilot Program?
 - a. What about consortia applications, and government and nonprofit entities? Can they participate?
2. What do schools and libraries that *don't* currently participate in the E-rate program need to do to participate in the Cybersecurity Pilot Program?
 - a. How should they get started/prepared?

Timeline

1. Can you walk us through the application process and associated timelines (or time frames)?
 - a. 484 Part 1; 484 Part 2?
 - b. The FCC applicant guide says that selected applicants will be notified via a Public Notice. But this does not give a timeline for decisions which can have an impact on applicants' planning and regular E-Rate procurement schedules. Will the FCC create a deadline for applicant selection announcements?
 - c. When can applicants anticipate the 470/471 windows?

Selecting Participants

1. Consortia
 - a. May a consortium make an application that includes an individual entity making a *separate* application without penalty to either party, as long as the two proposed projects have no overlap in either equipment or service?
 - b. May a consortium make an application for a project that might (unknowingly) overlap with an individual application in some aspect of equipment or services without any penalty beyond one or the other application not being selected for Pilot participation?
 - c. Can an individual applicant be removed from the consortium in review and cost-allocated out?
2. If there is more than \$200 million in demand for funding, it is possible that there could be a mix of high and low discount applicants selected, or will applicants be selected by their

discount rate - meaning the 90% applications are funded first, then the 80% applications, etc.?

- a. Will the other prioritization factors (such as tribal affiliation or a mix of small/large applicants) play a part in the selection process if demand is greater than funding (which could mean funding a proposal from an 80% discount proposal that meets most of the Commission's prioritization goals over a 90% proposal that does not meet the Commission's prioritization goals)?
 - b. Will the cut-off appear at the band-level, or will the FCC mirror the former Priority 2 prioritization process of looking at the NSLP percentages to fund down into the next band?
3. Does an applicant's willingness to share cost metrics affect its chance of being selected?
 4. Will an applicant improve its chances at being selected if it only asks for funding to support basic cybersecurity needs or should it opt for a more comprehensive solution?

Forms

1. The FAQ's specify that: Pilot participants are not required to perform a new competitive bidding process when seeking support for equipment/services from a Master Services Agreement (MSA), including a state master contract, awarded pursuant to the E-Rate Form 470 process and applicable federal, state, Tribal, or local competitive bidding requirements if the MSA was negotiated by a governmental entity on behalf of the Pilot participant.
 - a. Is a Form 470 required when using state MSAs in the pilot program, assuming each district completes a proper mini-bid with all vendors on state contract?
 - i. The clarification needed here is what does "pursuant to the E-Rate Form 470 process" phrase mean exactly? Because items eligible under the Cybersecurity Pilot Program weren't E-Rate eligible in the past, MSAs for Cybersecurity equipment and services would not have had a 470 filed.
 - ii. Can a state post an E-rate 470 **now** for an MSA to make it eligible for use, or is there some time cut-off where the 470 had to have been posted?
2. Can an applicant change the cybersecurity plan it submitted with the FCC Form 484 Part 1 after it is selected to participate in the Pilot Program?
3. If an applicant is selected to participate in the pilot, what are the next steps if their 471 FRN is denied?
 - a. What are some grounds for a denial?
 - b. Is there an appeal/waiver process? Deadlines associated?

4. Now that the ability to add permissions for up to 3 consultants is available, will consultants have access to the 484 application to assist the applicant in filing, or will it be limited to the school/library staff and only the 470/471 will be available to view by consultants?
5. Can the FCC request USAC to make available the Form 484-1 in the training portal prior to September 19th?

Equipment Eligibility

1. There will be instances in which a firewall is partially eligible in the E-rate program, and also partially eligible in the Cybersecurity Pilot Program.
 - a. How should applicants handle this?
 - b. Will applicants be allowed to use the same 470 to request funding for firewalls in both the E-rate and CPP?
2. What kind of training is eligible?
 - a. Services/equipment vs. staff/student training.
3. Can an applicant purchase cybersecurity services and equipment from more than one of the four categories that the FCC has identified as eligible?

Competitive Bidding

4. The E-rate program allows applicants to use pre-existing contracts as a bid (Kalamazoo Reconsideration Order). Will the Cybersecurity Pilot Program allow applicants to use pre-existing contracts as a bid for the CPP program if a new 470 is posted for the services/equipment covered under that pre-existing contract?
5. If an applicant is selected for the Cybersecurity Pilot Program, can they use the new Category Two Exemption rule if they find eligible equipment or services that total a pre-discounted amount of \$3600 or less per library in a single funding year?

Reporting

1. Will the instrument to be used for the annual report/final report be made available prior to applicants submitting the Form 484?
 - a. How far in advance will they be made available?
 - b. If they are released after someone is approved to participate, can an applicant choose not to move forward (if the applicant determines the requirements are too onerous)?
2. What obligations are there for service providers?

Resources

1. What tools/resources are available for applicants planning to apply?
2. Is special assistance available for smaller schools and libraries to help them complete the application process?
3. For those applicants that are not selected, what other free resources are available to help meet their cybersecurity needs? (US Dept of Ed, CISA, etc.)
 - a. Schools and Libraries Cybersecurity Pilot Program FCC Form 484 Part 1 Overview and FAQs
September 10, 2024 at 3 p.m. ET – [Register](#)
 - b. Schools and Libraries Cybersecurity Pilot Program FCC Form 484 Part 1 System Walkthrough
September 17, 2024 at 3 p.m. ET – [Register](#)
 - c. Schools and Libraries Cybersecurity Pilot Program Overview for Service Providers
October 15, 2024 at 3 p.m. ET – [Register](#)