

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

Request for Review of a decision)	
by the Schools and Libraries Division)	Supplement to Correspondence
Clovis Municipal School District)	filed 4/5/2018
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	

Billed Entity Number: 143327

FCC Registration Number: 0015526957

FCC Form 471 Application number: 161046497

Funding Request Numbers: 1699104668, 1699104692

September 20, 2019

Clovis Municipal School District submits supplemental documentation to support the request submitted on April 5, 2018 requesting review of a decision by USAC on an application including state match.

During review, the district submitted the letter we have labeled as Attachment C to this correspondence. In Attachment C, dated March 29, 2016, the matching funds amount of \$16,000 was awarded by the Public Schools Capital Outlay Council (PSCOC) as a not to exceed amount in advance of the district's application for E-rate discounts submitted May 24, 2016.

USAC's reviewer did not update the amount of the matching funds during the review. Following the funding commitment an appeal was submitted to correct the state match and to add the amount for taxes which was not included the original request for discounts. This was a ministerial error.

In the USAC appeal, two attachments were included: a letter showing final confirmation of funding was submitted to show the details regarding the total amount and the matching funds amount. Secondly, vendor documentation in the form of a bill from the service provider was submitted as proof of the amount paid for taxes.

USAC did not contact the district during the appeal to request any other information, and the information in the denial letter did not give a reason for denial, other than the appeal was not

persuasive enough. Due to this lack of detail, are at a loss to understand why the appeal to USAC was denied.

If the reason for denial was due to the dates on the documentation we sent as support for the request, we ask the FCC to consider the attachment as evidence that the state match existed before the application for discounts was filed.

As for the taxes, Gross Receipts Tax Rates are publicly available on the New Mexico Taxation and Revenue website here: <http://www.tax.newmexico.gov/gross-receipts-tax-historic-rates.aspx>

We have provided as Attachment D, the Gross Receipts Taxes schedule. Clovis is in Curry County and the tax is listed as 8.0625%

Below is a screenshot of the application in EPC. According to the application, EPC was unable to correctly calculate the state match information. We are unsure why the reviewer did not correct the state match information during review.

Narrative

Self provisioned fiber between Gattis and the data center.

FRN Calculation

One-Time Charges		Total Requested Amount	
Total One-Time Charges	\$124,800.00	Total Pre-Discount Charges	\$124,800.00
Total Ineligible One-Time Charges	- \$0.00	Special Construction State/Tribal Match Percentage	2.40%
Total Eligible Pre-Discount One-Time Charges	= \$124,800.00	Special Construction State/Tribal Match Discount Rate*	82.40%
		Funding Commitment Request	= \$102,835.20
		* E-rate will potentially match up to an additional 10% based on state or tribal funding for special construction	

** Special construction State / Tribal Match Discount Rate for E-Rate cannot be calculated because your Total Eligible pre-discount one-time charges is equal to Zero

Invoicing Status

Ready for Invoicing? Yes

Thank you for allowing us to provide supplemental information to facilitate your decision. We've attached to this correspondence all attachments: A, B, C and D for your reference.

Respectfully submitted:



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