

1 Ann Arbor Public Schools, DA 10-2354, Rel. December 16, 2010, CC Docket Number 02-6
Archer Public Library, DA 08-2381, Rel October 30, 2008, CC Docket Number 02-6

This appeal is timely submitted within the 60-day window of USAC
(Administrator) decision of RFCDL of September 18, 2019.

Pitt County Schools
BEN 126888
FCCRN 0012172276
Application Number 191000017
FRN 1999000012 (Line Items .001 Circuits and .002 taxes)
EPC Appeal Number 142948
RFCDL September 18, 2019

Background:

PCS filed application 191000017 on January 16, 2019 (first day of the window for FY 2019 – Attachment C) and, with no PIA outreach, subsequently received approval in Wave 1, April 27, 2019 (Attachment D, FCDL). The FRN 1999000012 is for WAN service from Conterra Ultra Broadband LLC, SPIN 143025700. PCS uses the SPI method for invoicing and the non-discounted share is funded by the North Carolina Department of Public Instruction, School Connectivity Fund.

At the time of 471 filing, PCS used the COPY FRN feature based on then current Conterra invoices, but should have used the cost figures from the vendor contract (EPC Module, Contract ID 201984, Attachment E, page 10 of 12). This source document was inadvertently overlooked when applying for service.

On May 9, 2019, Conterra reached out to PCS with concerns that the amount in the FRN was incorrect. At that point, PCS realized they should have used the amount from the contract and not relied on the COPY FRN feature. The next day, May 10, 2019,

an appeal was filed in the E-rate Productivity Center portal. Appeal number 142948 was filed well within the 60-day appeal window to Administrator explaining the post commitment M&C error.

On September 18, 2019, five months after filing the M&C appeal to the Administrator, with no outreach from the reviewer, PCS received a denial, detailed in the RFCDL.

PCS respectfully requests FCC assistance to correct the M&C error on behalf of PCS, allowing the district to continue to provide high-speed, broadband connectivity to the 25,000 students and teachers in the district.

Conclusion

The Commission has held that errors on a Form 471 could be corrected once discovered. In this case, the error was discovered before the deadline for appeal submission from the Funding Commitment Letter, and an appeal was immediately submitted to the Administrator. Because of the extreme hardship placed on the district with this M&C error, and in accordance with Ann Arbor and Archer, PCS asks that the pre-discount funding request be increased to account for charges not known to PCS at the time of application submission and review.

Respectfully submitted this 2st Day of October, 2019.

Carol Rankin



Pitt County Schools
Administrative Assistant to the Superintendent and the Board of Education Members