

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Request for Waiver)	
Of Section 54.507(d)(4))	Application Nos.
Of the Commission's Rules)	161026102 and 161026141
By the Henry County (GA) School District)	

**REQUEST FOR WAIVER
OF SECTION 54.507(D)(4) OF THE COMMISSION'S RULES
BY THE HENRY COUNTY (GA) SCHOOL DISTRICT**

Pursuant to section 54.719(c) of the Commission's rules,¹ the Henry County (GA) School District ("Henry County" or "the District") hereby respectfully requests a waiver of the service installation deadline at section 54.507(d)(4) of the Commission's rules for the above-referenced applications.² For the reasons set forth below, the Wireline Competition Bureau (Bureau) should grant this waiver request, and any other waivers necessary to grant the requested relief, and remand the above-captioned application to USAC so that the District can receive its committed funding.

¹ 47 C.F.R. § 54.719(c).

² 47 C.F.R. § 54.507(d).

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EXECUTIVE SUMMARY

Henry County requested funding for internal connections for funding year 2016, received its funding commitment late in the funding year, and then needed a little extra time to complete the installation of its internal connections. The project represented the first time Henry County had upgraded its internal connections in years. Upon receiving all of the funding commitments by December 2016, Henry County immediately began installation. When the District's service provider, Dimension Data North America (Dimension Data), began that work, it and the District encountered several delays related to 1) other school facility construction; 2) state-mandated testing schedules; and 3) existing cabling and other infrastructure issues. These issues pushed the work's completion beyond the funding year's September 30, 2017 deadline, by only a couple of months.

Henry County's consultant, Karen Allen of Allen & Allen Consulting LLC, had checked USAC's data retrieval tool during the process and mistakenly thought the listed contract deadline date – which was September 30, 2018 – was also the service installation deadline date. It was not until the service provider submitted a timely invoice for the work in December and the invoices were denied that Ms. Allen realized that the service installation deadline was in fact September 30, 2017, and that she should have requested a service installation deadline extension.

The District met the Commission's substantive requirements for the service installation extension as the delay was caused by several factors outside of the service provider's control. The District simply failed to file the extension request prior to September 30. As soon as the mistake was realized, the District's consultant filed the extension request with USAC. That request is pending, but the District expects that it will be denied absent a waiver from the

Commission, because it was filed about 11 weeks late, and USAC of course cannot grant waivers of the Commission's rules.

The Bureau has previously granted waivers of the service implementation extension deadline when—as here—the extension request was filed late. The District's minor delay in completing the project falls within the rationale for receiving an extension under the Commission's substantive rule. Given that the rest of the project is worth more than \$500,000—about \$50,000 per school—to the District, it would be unjust to deny the funding for such a minor paperwork error with a delay of only a few weeks. In fact, if the Bureau grants this appeal expeditiously, the invoices for much of this work can still be filed timely (due January 29, 2018). Accordingly, granting this appeal is in the public interest.

I. BACKGROUND

The Henry County School District is a large district with 52 schools on the south side of the Atlanta Metro area. The District's National School Lunch Program rate is consistently between 51 percent and 55 percent so the District falls into the 80 percent E-rate discount band for Category 1 broadband and Category 2 equipment.

In funding year 2016, the District applied for Category 2 funds.³ Because its broadband infrastructure was so insufficient and the need for Category 2 equipment was so great, the District decided to request equipment for all 52 schools in the same funding year. The type of equipment it requested consisted primarily of switches, cabling and battery backups. The District planned to complete this equipment project this year and then upgrade its wireless infrastructure in a subsequent year.

The District appreciates the work on the E-rate Modernization Order that allowed the District to upgrade its internal connections, as, until Funding Year 2016, the District had never received E-rate funds for internal connections equipment purchases. Henry County was awarded approximately \$3.2 million for internal connections in four applications.

To manage the implementation, the District divided the LAN Upgrade project into four phases with the schools that needed the equipment the most in the first phases.⁴ Each of the four phases was identified in a separate application and each school has its own funding request, for ease of administration. Although the contract data and equipment requests were essentially the same for all schools, USAC funded Phase 4 first on September 19, 2016.⁵ The District was

³ FCC Forms 471 161026102, 161026141, 161023247, and 161026038.

⁴ FCDL List, Exhibit 1.

⁵ *Id.*

hoping the other three phases, with the needier schools, would be funded shortly after Phase 4, which is why the District did not immediately start work on Phase 4. It was 3½ months later – at the end of December 2016 – before the other three phases were funded.⁶ Once Phase 1 was funded, the District and its service provider put all resources into this phase and followed with Phases 2, 3 and 4, in that order.

The District intended to complete all 52 schools by September 30, 2017. However, the service provider ran into issues with some of the schools which delayed the implementation schedule. The issues were as follows:

- 1) Some of the work was delayed due to scheduling conflicts with other facility work being completed by the District. In some cases, the equipment installation had to wait on other facilities work because the other work would have required the newly installed equipment to be moved, which simply would have not made sense for the District.
- 2) During installation, the service provider encountered issues with insufficient conduit and existing cabling issues.
- 3) As the Bureau is probably aware, all installation comes to a complete halt when a school district is getting ready for and during state-mandated testing. Therefore, there were several periods of time that no work could be completed.

By mid-September, out of 52 installations, there were only 10 schools where the work was not yet completed. A combination of the issues detailed above pushed the deadline for the work's completion beyond the funding year's September 30, 2017 deadline, but only by a few months.

⁶ *Id.*

Henry County's consultant, Karen Allen of Allen & Allen Consulting, LLC, had checked USAC's data retrieval tool during the process and mistakenly thought the "contract end date/service end date" – which was listed as September 30, 2018 – was also the service installation deadline.⁷ It was not until the service provider submitted a timely invoice for the work in December and was denied that she discovered she had needed to request a service installation deadline extension for those remaining 10 schools.⁸

Those 10 schools represent more than \$500,000 in commitments.⁹ All equipment has been delivered to the school district office and can be installed as soon as possible if this waiver is granted.

On December 27, Ms. Allen filed two FCC Form 500s to request the service delivery extension requests for these 10 FRNs.¹⁰ They are Form 500 #87157 for eight schools that are part of Phase 4 application 161026141 and Form 500 #87158 for two schools that are part of Phase 3 application 161026102. USAC has not yet issued a decision on these, but a denial is anticipated given that USAC cannot waive a Commission rule. Henry County herein timely files its request for waiver with the Commission.¹¹

⁷ See Affidavit of Karen Allen, attached.

⁸ SPI 143007139 Data Dimension Payment Denials, Exhibit 2.

⁹ See Payout Status as of 12-16-2017, Exhibit 3 for a specific list of schools and funding requests. The FRNs noted are the same as those listed on the service provider invoice denials.

¹⁰ See service delivery extension requests, Exhibit 4.

¹¹ Henry County has not yet received a decision on its service delivery extension request, but expects a denial imminently as only the Commission can grant a waiver of the deadline. To the extent the Commission believes necessary, Henry County also appeals the denial of its invoices. However, if this waiver is granted, the District will receive additional time to resubmit its invoices.

II. HENRY COUNTY'S IMPLEMENTATION EXTENSION REQUEST SATISFIES THE CRITERIA IN THE COMMISSION'S RULES

As an initial matter, Henry County's implementation request meets the criteria to receive an extension of the installation deadline, had the request been filed on time.

Section 54.507(d)(4)(iii) of the Commission's rules provides that an applicant may obtain an implementation extension from USAC if "[t]he applicant's service provider is unable to complete implementation for reasons beyond the service provider's control."¹² In this case, as described above, the service provider was unable to complete the installation for reasons beyond the service provider's control. After the commitments were granted in December, the service provider had to wait for scheduling issues due to state testing and other facilities work. In addition, the state of the existing conduit and cabling was beyond the control of the service provider. Finally, the District did not receive its commitments until nearly six months into the funding year, and the District prudently waited until it received its commitments before beginning work. Accordingly, Henry County's extension request satisfied section 54.507(d)(4)(iii) of the Commission's rules as a substantive matter.

III. A WAIVER OF THE COMMISSION'S INSTALLATION EXTENSION DEADLINE IS IN THE PUBLIC INTEREST

As we have explained, Henry County's extension request substantively satisfied the criteria in the Commission's rules. Henry County therefore respectfully requests that the Bureau waive section 54.507(d) because it filed the extension request after the service installation deadline for funding year 2016.¹³

¹² 47 C.F.R. § 54.507(d)(4)(iii).

¹³ The rule does not state that the service delivery extension request must be filed prior to the deadline. The Commission adopted that requirement in an Order. *See Federal-State Joint Board on Universal Service*, CC 96-45, Report and Order, 16 FCC Rcd 13510, ¶ 15 (2001).

Any of the Commission's rules may be waived if good cause is shown.¹⁴ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.¹⁵ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.¹⁶ The Bureau has waived section 54.507(d) where it has found that the applicants "attempted in good faith to comply in a timely manner in seeking an extension of the deadline."¹⁷

In its 2015 *Accelerated Charter Order*, the Bureau granted the petitioners' appeals regarding their installation extensions when they "made significant efforts to secure the necessary extensions" even though they filed their extensions late.¹⁸ Here, Henry County submitted its extension request with USAC within three business days of discovering that it needed to file an extension request. In addition, it has filed the instant waiver request with the Commission less than three weeks after the discovery. As described above, the work is nearly complete, as the equipment was delivered to the remaining schools in December. All that remains is for the equipment to be installed. As such, Henry County believes it has satisfied the Commission's standard of making "significant efforts" to obtain the installation extension.

¹⁴ 47 C.F.R. § 1.3.

¹⁵ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (Northeast Cellular).

¹⁶ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

¹⁷ *Requests for Review of the Decision of the Universal Service Administrator by Lancaster School District*, CC Docket No. 02-6, Order, DA 11-741, ¶ 3 (WCB, TAPD 2011).

¹⁸ *Requests for Review/Waiver of the Decision of the Universal Service Administrator by Accelerated Charter*, Order, 29 FCC Rcd 13652, 13652-53 ¶ 2 (WCB TAPD 2014) (*Accelerated Charter Order*).

In the wake of the *Accelerated Charter Order*, the Bureau has granted a number of late-filed installation extension requests.¹⁹ Henry County believes that it has made as good a case for waiver as have other applicants whose late-filed extension requests the Bureau has granted. For example, Henry County's appeal is as deserving of a grant as Harlandale's was, given that the state of its internal connections was not something the District's service provider could have known before starting work.²⁰ The service provider also obviously does not have control over the state testing schedule nor the other facilities work at the District.

In addition, the Bureau denied some late-filed extension requests where the applicants "failed to demonstrate they were unable to complete implementation on time for reasons beyond the service providers' control."²¹ Here, as explained above, Henry County's request was late-filed but it has demonstrated the reason the installation was not completed by the September 30, 2017 deadline was due to circumstances outside of the service provider's control.

If the Bureau declines to grant the requested relief, Henry County could return the equipment, file an FCC Form 500 returning the committed funding, and then re-apply for

¹⁹ See, e.g., *Request for Review of Decisions of the Universal Service Administrator by Academy Charter School et al.*, CC Docket No. 02-6, Order, 29 FCC Rcd 5820 (Wireline Comp. Bur. 2014) (granting 11 extensions of the services implementation deadline when petitioners were unable to complete implementation on time for reasons beyond the service providers' control and made significant efforts to secure the necessary extensions). See also *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket Nos. 02-60, 13-184, Public Notice, 31 FCC Rcd 13450 (2016) (granting a late-filed service implementation deadline extension request filed by Greyhills Academy); *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket Nos. 02-60, 06-122, Public Notice, 30 FCC Rcd 3893 (2015) (*Harlandale PN*) (granting three service implementation deadline extension requests that had been filed late, including that of the Harlandale Independent School District); *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket Nos. 02-60, 06-122, Public Notice, 31 FCC Rcd 3932 (2016) (granting the Ch'ooshgai Community School's appeal).

²⁰ See Harlandale PN.

²¹ See, e.g., *Accelerated Charter Order*, 29 FCC Rcd at 13653 ¶ 3 & n.8); *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket No. 06-122, Public Notice, 30 FCC Rcd 15653 (2015).

funding in funding year 2018 for the remaining schools in the project, as the current contract is effective for an additional year. Performing those steps would achieve the same result as granting this waiver: obtaining funding for this C2 project. But it would cost the District additional funds to return the equipment and to file an additional application. It also would be inefficient for USAC, in that USAC has already reviewed and approved this application. Henry County therefore respectfully argues that granting this waiver would be in the public interest and would further the goals of the E-rate program, because it will avoid inefficiencies and additional costs both to the District and to USAC.

Henry County believes that denying E-rate funding under these circumstances would be unjust, and that waiving the rule to the extent necessary would be efficient and consistent with the public interest. As such, Henry County respectfully argues that a waiver of section 54.507(d) would be in the public interest.

IV. CONCLUSION

For the foregoing reasons, the Bureau should grant Henry County's request for waiver. The Bureau should also grant a waiver of any other rules, such as the invoicing deadline rules, necessary to effectuate a grant of this appeal.

Respectfully submitted,

/s/ Karen Allen
Karen Allen
President
Allen & Allen Consulting, LLC
5640 Sandown Way
Johns Creek, GA 30097
Karen@eratespecialists.com
404-312-8806

January 8, 2018

CERTIFICATE OF SERVICE

This is to certify that on this 8th day of January, a true and correct copy of the foregoing

Request for Review was sent via email to:

SLD, Universal Service Administrative Company, Appeals@sl.universalservice.org

Bronwen Stuchbury, Bronwen.Stuchbury@dimensiondata.com

Kristin Circhirillo, Kristin.Circhirillo@dimensiondata.com

/s/ Karen Allen

Affidavit of Karen Allen

I, Karen Allen, swear:

1. I am the president of Allen & Allen Consulting, LCC. I have served as consultant for the Henry County School District since September, 2009. I was responsible for filing Henry County's application for E-rate funding for funding year 2016, as well as the associated forms and documentation.
2. In mid-September, my husband and I were notified that his mother's doctors estimated she had only three to four weeks to live. Because we are the only family members in Atlanta where she lives, we picked up the responsibility to care for her. In addition, we had family members from all parts of country coming to our home for days and weeks at a time for last visits. I work from home and I must admit that there was chaos in our home. She died on November 2, 2017.
3. During this chaotic time, I pulled reports from the Data Retrieval Tool (DRT) for all my clients to ensure that C2 work was being completed and C1 being fully invoiced. When I got to Henry County, the "Contract End Date/Service End Date" was listed as "9/30/2018". Not thinking clearly, I read this thinking that I did not have to file a Service Delivery Extension Request (SDER) because I had another year.
4. On December 21, 2017, I got notification from the service provider, Dimension Data, that invoices for 10 FRNs had been denied due to "Billed Date Outside of Funding Year." When I saw this, it hit me like a ton of bricks that I misinterpreted the DRT data and I should have filed the SDER before September 30, 2017.
5. I have been an E-rate consultant for 10 years. This is the first time I have had to file a waiver request with the FCC on behalf of a client due to an error.

6. I avow the information stated in the foregoing appeal is true and correct to the best of my knowledge and belief.

 1/8/2018

Karen Allen

President

Allen & Allen Consulting, LLC

5640 Sandown Way

Johns Creek, GA 30097

404-312-8806

Exhibit 1

FCDL List

School	Form 470	471 - FRN	Desc	FCDL	%	SPIN	FCDL Date	486 Filed	486 Certified	486 Letter Received
Phase 1										
Henry County - 127311	160004660	161023247 - 1699045108	C2 - Bethlehem ES - Data Dimensions	\$43,928.38	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051311	C2 - Luella Middle School	\$61,017.53	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051327	C2 - Luella High School	\$115,312.01	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051336	C2 - Locust Grove Middle School	\$82,211.72	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051348	C2 - Henry County Middle School	\$65,276.58	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051355	C2 - Luella Elementary School	\$49,727.43	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051381	C2 - Mt. Carmel Elementary School	\$49,727.43	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051391	C2 - New Hope Elementary School	\$50,035.43	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051402	C2 - Ola Elementary School	\$65,738.58	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051409	C2 - Unity Grove Elementary School	\$66,816.58	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051423	C2 - Woodland Elementary School	\$55,218.48	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161023247 - 1699051432	C2 - Locust Grove High School	\$115,312.01	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Phase 2										
Henry County - 127311	160004660	161026038 - 1699051846	C2 - Stockbridge High School	\$120,649.06	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051930	C2 - Eagles Landing High School	\$97,914.86	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051938	C2 - Eagles Landing Middle School	\$81,749.72	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051945	C2 - Excel Academy	\$33,184.88	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051956	C2 - Flippen Elementary School	\$49,265.43	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051967	C2 - Hickory Flat Elementary School	\$54,140.48	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051975	C2 - Rock Spring Elementary School	\$50,035.43	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051980	C2 - Tussahaw Elementary School	\$43,928.38	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051983	C2 - Walnut Creek Elementary School	\$38,129.34	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699051996	C2 - Dutchtown High School	\$126,140.10	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699052001	C2 - Dutchtown Middle School	\$81,441.72	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026038 - 1699052008	C2 - Ola High School	\$120,649.06	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Phase 3										
Henry County - 127311	160004660	161026102 - 1699052053	C2 - Union Grove High School	\$131,477.15	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052059	C2 - Woodland High School	\$120,803.06	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052062	C2 - Henry County High School	\$81,903.72	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052068	C2 - Austin Road Middle School	\$54,756.48	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052072	C2 - Stockbridge Middle School	\$54,602.48	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052074	C2 - Ola Middle School	\$87,548.77	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052081	C2 - Union Grove Middle School	\$82,211.72	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052091	C2 - Woodland Middle School	\$60,401.53	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052098	C2 - Dutchtown Elementary School	\$53,832.48	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052125	C2 - Wesley Lakes Elementary School	\$43,004.38	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052135	C2 - Hampton Elementary School	\$33,100.29	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052139	C2 - Hampton Middle School	\$65,276.58	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Henry County - 127311	160004660	161026102 - 1699052148	C2 - Austin Road Elementary School	\$27,917.24	80%	143007139	12/28/2016	1/2/2017	1/2/2017	1/2/2017
Phase 4										
Henry County - 127311	160004660	161026141 - 1699052193	C2 - Cotton Indian Elementary School	\$54,602.48	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052196	C2 - Eastlake Elementary School	\$43,158.38	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052199	C2 - Fairview Elementary School	\$43,466.38	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052201	C2 - Locust Grove Elementary School	\$33,254.29	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052205	C2 - Oakland Elementary School	\$55,372.48	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052208	C2 - Pates Creek Elementary School	\$49,727.43	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052213	C2 - Pleasant Grove Elementary School	\$32,946.29	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052217	C2 - Red Oak Elementary School	\$54,910.48	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052219	C2 - Rocky Creek Elementary School	\$50,035.43	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052221	C2 - Smith Barnes Elementary School	\$16,473.14	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052223	C2 - Stockbridge Elementary School	\$49,111.43	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052225	C2 - Timber Ridge Elementary School	\$43,774.38	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016
Henry County - 127311	160004660	161026141 - 1699052229	C2 - Hampton High School	\$65,276.58	80%	143007139	9/19/2016	9/19/2016	9/20/2016	9/20/2016

Exhibit 2

SPI 143007139 Data Dimension Payment Denials

143007139|Dimension Data North America,
Inc.|denise.andrews@dimensiondata.com|usacstatement@universalservice.org|
10|\$0.00|Schools And Libraries|As of December 21, 2017
SPI|143007139|Henry County-Materials|1699052225|"SLD Invoice
Number:2743938;Line Item Detail Number:8981062;Amount
Requested:39737.06;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052196|"SLD Invoice
Number:2743938;Line Item Detail Number:8981120;Amount
Requested:39121.06;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052229|"SLD Invoice
Number:2743938;Line Item Detail Number:8981122;Amount
Requested:59220.58;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052139|"SLD Invoice
Number:2743938;Line Item Detail Number:8981124;Amount
Requested:59220.58;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052062|"SLD Invoice
Number:2743938;Line Item Detail Number:8981126;Amount
Requested:74333.72;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052201|"SLD Invoice
Number:2743938;Line Item Detail Number:8981127;Amount
Requested:30226.29;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052205|"SLD Invoice
Number:2743938;Line Item Detail Number:8981129;Amount
Requested:50325.82;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052208|"SLD Invoice
Number:2743938;Line Item Detail Number:8981130;Amount
Requested:45185.44;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052213|"SLD Invoice
Number:2743938;Line Item Detail Number:8981131;Amount
Requested:29918.29;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00
SPI|143007139|Henry County-Materials|1699052219|"SLD Invoice
Number:2743938;Line Item Detail Number:8981132;Amount
Requested:45493.43;Billed Date after [09/30/2017] fund yr;one time
cost;75;Billed Date Outside of Funding Year;285;"|062017|\$0.00

Your Total Actual Disbursement: \$0.00.

Exhibit 3
Payout Status as of 12-16-2017

FRN	471 Application Number	Service Provider Name	Fund Year	486 Service Start Date	Contract Award Date	Contract Exp or Svc End Date	Remaining	Last Date to Invoice	Orig FRN Service Type	FRN Committed Amount	Invoicing Method	Total Authorized Disbursed
1699019297		161011802 ENA Services, LLC	2016		3/7/2014	6/30/2019		10/30/2017	Data Transmission and/	\$0.00	NOT SET	
1699026854		161015370 BellSouth Telecommu	2016	7/1/2016	3/21/2016	6/30/2019	2	10/30/2017	Voice	\$105,963.65	SPI	\$105,963.65
1699026866		161015370 AT&T Corp.	2016	7/1/2016		6/30/2017		2/26/2018	Voice	\$6,321.60	SPI	\$4,136.69
1699026871		161015370 BellSouth Telecommu	2016	7/1/2016	3/17/2016	6/30/2017	9	10/30/2017	Data Transmission and/	\$424,325.76	SPI	\$424,325.76
1699026877		161015370 Verizon Wireless (Cell	2016	7/1/2016		6/30/2017		10/30/2017	Voice	\$11,130.24	SPI	\$11,130.24
1699032975		161018133 ENA Services, LLC	2016	7/1/2016	3/7/2014	6/30/2018		10/30/2017	Data Transmission and/	\$110,400.00	SPI	\$110,400.00
1699045108		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$43,928.38	SPI	\$43,928.38
1699051311		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$61,017.53	SPI	\$61,017.53
1699051327		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$115,312.01	SPI	\$115,312.01
1699051336		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$82,211.72	SPI	\$82,211.72
1699051348		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$65,276.58	SPI	\$65,276.58
1699051355		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$49,727.43	SPI	\$49,721.85
1699051381		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$49,727.43	SPI	\$49,721.85
1699051391		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$50,035.43	SPI	\$50,035.43
1699051402		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$65,738.58	SPI	\$65,738.58
1699051409		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$66,816.58	SPI	\$66,816.58
1699051423		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$55,218.48	SPI	\$55,218.48
1699051432		161023247 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$115,312.01	SPI	\$115,312.01
1699051846		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$120,649.06	SPI	\$120,649.06
1699051930		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$97,914.86	SPI	\$97,914.86
1699051938		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$81,749.72	SPI	\$81,749.72
1699051945		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$33,184.88	SPI	\$33,184.88
1699051956		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$49,265.43	SPI	\$49,265.43
1699051967		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$54,140.48	SPI	\$54,140.48
1699051975		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$50,035.43	SPI	\$50,035.43
1699051980		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$43,928.38	SPI	\$43,928.38
1699051983		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$38,129.34	SPI	\$38,129.34
1699051996		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$126,140.10	SPI	\$126,140.10
1699052001		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$81,441.72	SPI	\$81,441.72
1699052008		161026038 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$120,649.06	SPI	\$120,649.06
1699052053		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$131,477.15	SPI	\$130,152.82
1699052059		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$120,803.06	SPI	\$119,589.08
1699052062	✓	161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$81,903.72	SPI	\$0.00
1699052068		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$54,756.48	SPI	\$54,204.67
1699052072		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$54,602.48	SPI	\$54,050.67
1699052074		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$87,548.77	SPI	\$86,665.87
1699052081		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$82,211.72	SPI	\$81,384.01
1699052091		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$60,401.53	SPI	\$59,794.54
1699052098		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$53,832.48	SPI	\$53,280.67
1699052125		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$43,004.38	SPI	\$42,562.94
1699052135		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$33,100.29	SPI	\$32,769.20
1699052139	✓	161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$65,276.58	SPI	\$0.00
1699052148		161026102 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$27,917.24	SPI	\$27,641.34
1699052193		161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$54,602.48	SPI	\$54,050.67
1699052196	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$43,158.38	SPI	\$0.00
1699052199	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$43,466.38	SPI	\$42,562.94
1699052201	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$33,254.29	SPI	\$0.00
1699052205	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$55,372.48	SPI	\$0.00
1699052208	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$49,727.43	SPI	\$0.00
1699052213	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$32,946.29	SPI	\$0.00
1699052217	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$54,910.48	SPI	\$54,358.67
1699052219	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$50,035.43	SPI	\$0.00
1699052221	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$16,473.14	SPI	\$16,307.60
1699052223	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	6/30/2018		1/29/2018	Internal Connections	\$49,111.43	SPI	\$48,614.81
1699052225	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$43,774.38	SPI	\$0.00
1699052229	✓	161026141 Dimension Data Nortl	2016	7/1/2016	3/14/2016	9/30/2018		1/29/2018	Internal Connections	\$65,276.58	SPI	\$0.00

Exhibit 4

Service Delivery Extension Requests

Records / FCC Forms 500

Henry County Service Delivery Extension - #87157


[Summary](#) / [Associated FRNs](#) [Review Inquiries](#) [News](#) [Related Actions](#)

In-Review

Outreach

Wave Ready

Committed

Funding Commitment Adjustment Request Form

FCC Form 500 Details

View Status (+)

Funding Year 2016

Submitting Organization HENRY COUNTY SCHOOL DISTRICT (BEN: 127311)

Created By Karen Allen

Created On 12/27/2017 9:09 AM EST

Main Contact

Name Karen Allen

Email karen@eratespecialists.com

Phone Number 404-312-8806

Service Delivery Extension Request

FRN	Application Number	Application Nickname	FRN Nickname	Category of Service	SPIN	SPIN Name
1699052196	161026141	Henry County LAN Infrastructure Upgrade - Phase 4	Eastlake Elementary School	Category 2	143007139	Dimension Data North America, Inc.
1699052201	161026141	Henry County LAN Infrastructure Upgrade - Phase 4	Locust Grove Elementary School	Category 2	143007139	Dimension Data North America, Inc.
1699052205	161026141	Henry County LAN Infrastructure Upgrade - Phase 4	Oakland Elementary School	Category 2	143007139	Dimension Data North America, Inc.
1699052208	161026141	Henry County LAN Infrastructure Upgrade - Phase 4	Pates Creek Elementary School	Category 2	143007139	Dimension Data North America, Inc.
1699052213	161026141	Henry County LAN Infrastructure Upgrade - Phase 4	Pleasant Grove Elementary	Category 2	143007139	Dimension Data North America, Inc.
1699052219	161026141	Henry County LAN Infrastructure Upgrade - Phase 4	Rocky Creek Elementary School	Category 2	143007139	Dimension Data North America, Inc.
1699052225	161026141	Henry County LAN Infrastructure Upgrade - Phase 4	Timber Ridge Elementary School	Category 2	143007139	Dimension Data North America, Inc.
1699052229	161026141	Henry County LAN Infrastructure Upgrade - Phase 4	Hampton High School	Category 2	143007139	Dimension Data North America, Inc.

8 items

Service Provider Questions

Was the service provider unable to complete delivery and installation for reasons beyond their control?

☒ YES ☐ NO

Was the service provider unwilling to complete delivery and installation after USAC withheld payment for more than 60 days on an invoice for those services?

☐ YES ☒ NO

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Records / FCC Forms 500

Henry County LAN Upgrade - Phase 3 Service Delivery Extension - #87158



Summary Associated FRNs Review Inquiries News Related Actions

In-Review

Outreach

Wave Ready

Committed

Funding Commitment Adjustment Request Form

FCC Form 500 Details

View Status (+)

Funding Year

2016

Submitting Organization

HENRY COUNTY SCHOOL DISTRICT (BEN: 127311)

Created By

Karen Allen

Created On

12/27/2017 9:29 AM EST

Main Contact

Name

Karen Allen

Email

karen@eratespecialists.com

Phone Number

404-312-8806

Service Delivery Extension Request

FRN	Application Number	Application Nickname	FRN Nickname	Category of Service	SPIN	SPIN Name
1699052062	161026102	Henry County LAN Infrastructure Project - Phase 3	Henry County High School	Category 2	143007139	Dimension Data North America, Inc.
1699052139	161026102	Henry County LAN Infrastructure Project - Phase 3	Hampton Middle School	Category 2	143007139	Dimension Data North America, Inc.

Service Provider Questions

Was the service provider unable to complete delivery and installation for reasons beyond their control?

YES✓

NO

Was the service provider unwilling to complete delivery and installation after USAC withheld payment for more than 60 days on an invoice for those services?

YES

NO✓

View Supporting Documentation (+)

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