

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

In the Matter of)	
)	
Request for Waiver and Appeal)	
60 Day Appeal Deadline)	CC Docket No. 02-6
Southeastern Public Library System of)	CC Docket No. 13-184
Oklahoma)	
McAlester, Oklahoma)	
)	
FCC Form 471 # 161032195)	
)	

**SOUTHEASTERN PUBLIC LIBRARY SYSTEM OF
OKLAHOMA**

MCALESTER, OK

January 14, 2018

Deborah Sovereign

Kellogg & Sovereign Consulting, LLC
1101 Stadium Drive
Ada, OK 74820
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Email: dsovereign@kelloggllc.com

On behalf of Southeastern Public Library System of Oklahoma, BEN 140224, I am respectfully requesting a waiver of the 60-day deadline for filing an Appeal with USAC.

Applicant Name:	Southeastern Pub Lib Sys of OK
Billed Entity Number	140224
Service Provider:	OneNet (Oklahoma State Regents)
SPIN:	143015254
Funding Year:	2016
Form 471 Application Number	161032195
Funding Request Numbers	1699073597 and 1699073664
Funding Letter Dated	January 4, 2017
Funding Letter Appeal Dated (Case # 42222)	April 22, 2017
Funding Letter Appeal Decision Date	December 13, 2017
Form 486 Number	37690
Form 486 Date of Submission	February 27, 2017
Form 486 Notification Letter Date	March 10, 2017
Form 486 Appeal Date (Case # 42221)	April 22, 2017
Form 486 Appeal Decision	Pending

Overview

The Southeastern Public Library System of Oklahoma (“applicant” or “Library System”) was transitioning service by upgrading bandwidth during the 2016-17 funding year. During PIA review, the applicant provided the reviewer with cut-over dates but the reviewer did not properly enter the service start date and service end dates for the new services.

As shown on the funding letter dated 1/4/2017, below, the commitment amounts were not revised to account for the service start and end dates as incorrectly entered by the PIA reviewer. Additionally, the FCDL comments did not mention the changes in the service start and end dates. As a result, the applicant was not aware that the service start date and service end dates were incorrectly adjusted by the PIA reviewer and that those changes would later result in a reduction of the funding.

The Library System submitted the FCC Form 486 for this application on 2/27/2017. The Form 486 notification letter dated March 10, 2017, only shows the service start date. It does not show the service end date.

The applicant was not aware there was a problem with the funding until the service provider notified it in an email on April 17, 2017 that the service dates were incorrect. The service provider noted the incorrect service start date after receiving the Form 486 notification letter.

On 4/22/2017, the applicant submitted an appeal with USAC to correct the service start and end dates on the application. USAC denied the FCDL appeal on December 13, 2017 because it said the Library System's appeal of the FCDL was late. The Library System also appealed the Form 486 notification letter because that was the first instance in which USAC noted that it had made changes to its information. The 486 appeal was timely filed within the 60-day deadline. USAC has not yet issued a decision on that appeal.

Because the applicant filed its appeal of the FCDL within 5 days of when it became aware of USAC's incorrect revisions to the service start and end dates, and because the applicant was required to file an appeal because USAC erred in its decision,¹ we respectfully request a waiver of the 60 day appeal to allow the appeal to be considered as timely submitted with USAC. In addition, the Library System notes that it appealed the FCC Form 486—the first document in which it could see USAC's error—by the deadline established in the rules.

60 Day denial:

The applicant submitted the appeal for FRNs 1699073597 and 1699073664 as soon as they were aware of the problem in the funding. The appeal was submitted 4/22/2017. USAC EPC Case # 42222.

Notice dated 12/13/2017: (Appeal wave #32)

FRN 1699073597:

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 04/22/2017. The Funding Commitment Decision Letter was issued on 01/04/2017. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

FRN: 1699073664:

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 04/22/2017. The Funding Commitment Decision Letter was issued on 01/04/2017. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

¹ See footnotes 2 and 3, below, for citations.

E-Rate Productivity Center Revised Funding Commitment Decision Letter for 140224 - SOUTHEASTERN PUB LIB SYS OF OK

Thank you for participating in the Schools and Libraries Program for Funding Year 2016. This letter is your notification that we have completed our review of the post-commitment requests submitted by you or your service provider, which can include appeals, service substitutions, SPIN changes, FCC Form 486 reviews, and/or FCC Form 500 reviews.

There are two files attached to this notification, both of which provide important information. The Excel file provides the funding decision for each FRN included in your post-commitment requests, and lists any changes USAC made to the FRNs. The second file contains information about your appeals rights, and other important program reminders. An explanation of the fields in the RFCDL is available in the EPC section of our website.

NEXT STEPS

- If you disagree with USAC's decision, review the attached pdf to determine how to appeal.
- If the FCC Form 486 has not alre ...[More](#)



[RFCDL Supplement](#)
PDF 114 KB



[Post Commit Request - 42222 - SOUTHEASTERN PUB LIB SYS OF OK](#)
XLSX 50 KB

[#140224 - SOUTHEAST...](#)

Dec 13, 2017 ☆ 🔒 [Comment](#) [More Info](#) ▾

Discussion

This is an interesting situation in that the funding commitment decision letter dated 1/4/2017 did not show that the commitment amount had been changed from the original FCC Form 471 filing.

The funding commitment report .csv file shows the following commitment amounts for these two funding requests as fully funded as originally requested

FRN 1699073597 – Commitment amount \$95,353.60 is the same as originally filed

FRN 1699073664 – Commitment amount \$52,518.40 is the same as originally filed

BEN	BEN_NAME	FRN	FCC Form 471	Status	Total Pre-Discount	Discount Rate	Committed Amount	App
140224	SOUTHEASTERN PUB LIB SYS OF	1699066730	161032195	Funded	\$23,051.52	40.00%	\$9,220.61	
140224	SOUTHEASTERN PUB LIB SYS OF	1699067401	161032195	Funded	\$1,664.40	40.00%	\$665.76	
140224	SOUTHEASTERN PUB LIB SYS OF	1699067429	161032195	Funded	\$3,257.28	40.00%	\$1,302.91	
140224	SOUTHEASTERN PUB LIB SYS OF	1699067442	161032195	Funded	\$792.96	40.00%	\$317.18	
140224	SOUTHEASTERN PUB LIB SYS OF	1699067464	161032195	Funded	\$532.44	40.00%	\$212.98	
140224	SOUTHEASTERN PUB LIB SYS OF	1699067473	161032195	Funded	\$5,667.48	40.00%	\$2,266.99	
140224	SOUTHEASTERN PUB LIB SYS OF	1699067486	161032195	Funded	\$6,989.04	40.00%	\$2,795.62	
140224	SOUTHEASTERN PUB LIB SYS OF	1699067505	161032195	Funded	\$153,048.00	80.00%	\$122,438.40	
140224	SOUTHEASTERN PUB LIB SYS OF	1699068441	161032195	Funded	\$32,268.00	80.00%	\$25,814.40	
140224	SOUTHEASTERN PUB LIB SYS OF	1699068538	161032195	Funded	\$91,740.00	80.00%	\$73,392.00	
140224	SOUTHEASTERN PUB LIB SYS OF	1699068699	161032195	Funded	\$19,580.16	40.00%	\$7,832.06	
140224	SOUTHEASTERN PUB LIB SYS OF	1699073597	161032195	Funded	\$119,192.00	80.00%	\$95,353.60	
140224	SOUTHEASTERN PUB LIB SYS OF	1699073664	161032195	Funded	\$65,648.00	80.00%	\$52,518.40	
SEPL_C1 161032195_1617.csv								

The original FCC Form 471 requested the following:

FRN Calculation for FRN #1699073597

Monthly Charges	
Total Monthly Recurring Charges	\$9,766.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$9,766.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$117,192.00

One-Time Charges	
Total One-Time Charges	\$2,000.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$2,000.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$117,192.00
Total Eligible Pre-Discount One-Time Charges	+ \$2,000.00
Total Pre-Discount Charges	= \$119,192.00
Discount Rate	80%
Funding Commitment Request	= \$95,353.60

FRN Calculation for FRN #1699073664

Monthly Charges	
Total Monthly Recurring Charges	\$5,429.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$5,429.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$65,148.00

One-Time Charges	
Total One-Time Charges	\$500.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$500.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$65,148.00
Total Eligible Pre-Discount One-Time Charges	+ \$500.00
Total Pre-Discount Charges	= \$65,648.00
Discount Rate	80%
Funding Commitment Request	= \$52,518.40

Additionally, the FCDL comments made no mention of the changes in the service start and end dates.

FRN 1699073597:

MR1: Data Transmission and/or Internet Access Services requested in FRN are connected to eligible schools, libraries, and/or NIFs. As a result, the Connection Information questions were modified from “No” to “Yes” on this FRN since services connected to eligible schools, libraries, and/or NIFs are eligible for support.

FRN 1699073664:

MR1: Data Transmission and/or Internet Access Services requested in FRN are connected to eligible schools, libraries, and/or NIFs. As a result, the Connection Information questions were modified from “No” to “Yes” on this FRN since services connected to eligible schools, libraries, and/or NIFs are eligible for support.

Therefore, the applicant had no reason to believe there was a problem with the funding at the time of the receipt of the funding commitment decision letter.

Services for both funding requests started on August 11, 2016. When the Form 486 was filed the service start date for FRN 1699073664 properly showed as 8/11/2016.

The Form 486 notification letter for FRN 1699073597 dated March 10, 2017, showed 12/21/2016 instead of 8/11/2016. However, the funding commitment amounts still displayed as the original amounts requested:

Funding Request Number (FRN):	Billing Account Number:	Service Start Date:	Adjusted Service Start Date:	Service Start Date Change Explanation:	Current Funding Commitment:
1699073597	9374, 9366, 4129, 9407 INT 100 MB	12/21/2016			95353.60
1699073664	9285 INT 1GB	08/11/2016			52518.40
	Form 486 notification letter 3/10/2017				
	Form 486 # 37690				

The Form 486 notification letter was the first place that the applicant could have seen the changes that USAC made to the service dates. The funding amounts were still the amounts originally requested by the applicant. It wasn't until the service provider alerted the applicant by email on April 17, 2017 that the applicant was aware of the issue. The service provider found out the discrepancy in the service start date when they reviewed the Form 486 notification.

Additionally, upon further inspection, the service end date for FRN 1699073664 was incorrectly changed to 12/19/2016 with funding allowed for only 5 months of this new service installed 8/11/2016. The service had just started 8/11/2016 and should have been funded for the remainder of the year through June 30, 2017.

The library is upgrading its sites as requested on the two different funding requests as follows:

SE Public Library System of OK - OneNet FY 2016										
ATTACHMENT 9 - FRN 1699073597			Acct#	B/W	MRC - INT	Install	MNG RTR	MRC TOTAL	ANNUAL AMT	
Internet Access	New	Broken Bow Pub. Lib.	9374-0	100 Mbps	\$ 3,670.00	\$ 500.00	\$ 89.00	\$ 3,759.00	\$ 45,608.00	
Internet Access	New	Coal County Pub. Lib.	9366-0	100 Mbps	\$ 1,450.00	\$ 500.00	\$ 89.00	\$ 1,539.00	\$ 18,968.00	
Internet Access	New	Patrick Lynch Pub. Lib.	4129-0	100 Mbps	\$ 2,840.00	\$ 500.00	\$ 89.00	\$ 2,929.00	\$ 35,648.00	
Internet Access	New	Stigler Public Library	9407-0	100 Mbps	\$ 1,450.00	\$ 500.00	\$ 89.00	\$ 1,539.00	\$ 18,968.00	
				TOTAL:	\$ 9,410.00	\$ 2,000.00	\$ 356.00	\$ 9,766.00	\$ 119,192.00	
				Installed 8/11/2016; should be 11 months					agrees w/ FCDL	
				Correct SSD: 8/11/2016; Correct Service End date: 6/30/2017						
			FRN 1699073597:	Correct pre-discount: \$9766 x 11 plus \$2,000 install =					\$ 109,426.00	
					Revised Commitment Amount 80%:					\$ 87,540.80
SE Public Library System of OK - OneNet FY 2016										
ATTACHMENT 10 - FRN 1699073664			Acct#	B/W	MRC - INT	Install	MNG RTR	MRC TOTAL	ANNUAL AMT	
Internet Access	New	McAlester Public Librar	9285-0	1Gbps	\$ 5,340.00	\$ 500.00	\$ 89.00	\$ 5,429.00	\$ 65,648.00	
				TOTAL:	\$ 5,340.00	\$ 500.00	\$ 89.00	\$ 5,429.00	\$ 65,648.00	
				Installed 8/11/2016; should be 11 months					agrees w/FCDL	
				Correct SSD: 8/11/2016; Correct Service End date: 6/30/2017						
			FRN 1699073664:	Correct pre-discount: \$5429 x 11 plus \$500 install =					\$ 60,219.00	
					Revised Commitment Amount 80%:					\$ 48,175.20

The table above shows the actual service start and end dates for these 5 circuits. The highlighted amounts show the correct commitment amounts with the start date of 8/11/2016 for both funding requests.

FRN 1699073597 should have a service start date of 8/11/2016 and service end date of 6/30/2017.

Total pre-discount \$109,426 x 80% = Revised Commitment Amount of \$87,540.80

FRN 1699073664 should have a service start date of 8/11/2016 and service end date of 6/30/2017.

Total pre-discount \$60,219.00 x 80% = Revised Commitment Amount of \$48,175.20

The service provider confirmed in an email dated 4/17/2017 that the service start date should be 8/11/2016:

From: Sanderson, Shelley [<mailto:shelley@onenet.net>]
Sent: Monday, April 17, 2017 10:39 AM
To: Mandy Wood <mwood@kelloggllc.com>
Subject: FW: E-rate Manager For Service Providers FRN Monitor Report

The 486 on FRN 1699073597 shows a service start date of 12/21/16 but I'm showing the service start date should be 8/11/16.

Funding Year 2016: FRN 1699073597

Applicant SOUTHEASTERN PUB LIB SYS OF OK, OK
(BEN: 140224)

Service Category Internet Access

Changes • Form 486 Service Start Date changed from " to '12/21/2016'

Funding Year 2016: FRN 1699073664

Applicant SOUTHEASTERN PUB LIB SYS OF OK, OK
(BEN: 140224)

Service Category Internet Access

Changes • Form 486 Service Start Date changed from " to '08/11/2016'

The Commission has allowed late-filed appeals when USAC committed an error² and where the applicant submitted its appeal within a reasonable amount of time of receiving actual notice of a USAC denial of funding.³

This situation falls within both of those situations and therefore the Library System respectfully requests that the Commission waive the appeal deadline and direct USAC to review the merits of its appeal so that the PIA reviewer's error can be corrected.

Conclusion

For the reasons stated above, the applicant respectfully requests a waiver of the 60-day appeal to allow the appeal to be considered as timely submitted with USAC.

Respectfully submitted,



Deborah J. Sovereign
Consultant

Attachment: Letter of Agency

² See *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket Nos. 02-60, Public Notice, DA **17-1217**, n.9 (WCB Dec. 29, 2017) (York County School District) ((citing *Requests for Review and/or Requests for Waiver of Decisions of the Universal Service Administrator by Animas School District 6 et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 26 FCC Rcd 16903, 16905, para. 4 (WCB 2011) (granting petitioners waivers of [the] filing deadline for appeals because their late-filed appeal would never have been necessary absent an error on the part of USAC)).

³ See, e.g., *Requests for Review and/or Waiver of Decisions of the Universal Service Administrator by ABC Unified School District et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 26 FCC Rcd 11019, 11019, para. 2 (WCB 2011) (*ABC Unified Order*) (granting waivers of filing deadline for appeals because they submitted their appeals within a reasonable period of time after receiving actual notice of USAC's adverse decision)

ATTACHMENT: LETTER OF AGENCY



401 North Second Street
McAlester, Oklahoma 74501
918.426.0456

E-RATE LETTER OF AGENCY 2016-17

APPLICANT: Southeastern Pub Lib Sys of OK, McAlester, OK

("Applicant") hereby authorizes Kellogg & Sovereign® Consulting, LLC or its designated agents or employees ("KSLLC") to act on our behalf during the term of this authorization.

Employees authorized: Debi Sovereign, Jane Kellogg, Mel Van Patten, Mandy Wood, Cameron King, Christina Bailey, Mai Fields, Natalie Green, Shea Pierce, Stacy Simpkins, Teagan Vick, Marci White.

Although not exclusive, KSLLC is specifically authorized to conduct the following actions on behalf of the Applicant:

- ♦ Prepare and submit Federal Communications Commission ("FCC") Forms 470, 471, 486, 500, 472 and other forms requested by the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC")
- ♦ Prepare and submit documentation to USAC or the FCC in compliance with E-Rate program rules and regulations.
- ♦ Act as our agent in working with representatives of the FCC or USAC to provide information as requested during application review, selective reviews, site visits, audits and any other activity associated with review of our applications.
- ♦ Prepare Requests for Proposal ("RFPs") to be posted to the KSLLC website and distributed to appropriate service providers.
- ♦ Provide information to service providers as needed to clarify information in RFPs and Forms 470.
- ♦ Solicit and receive proposals from service providers for requested services.
- ♦ Prepare comparisons of proposals from service providers.
- ♦ Complete contracts for eligible E-Rate services as specifically directed by the Applicant's authorized representative.

I also understand that in submitting these forms on our behalf, representatives of Kellogg & Sovereign® Consulting, LLC are making certifications for our school district. By signing this letter of agency under oath, I make the following certifications as required by the FCC¹:

I certify that the schools I represent are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity(ies) I represent or the entities listed on our applications will secure access, separately or through this program, to all of the resources, including computers, training, software, maintenance, internal connections, and electrical connections necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities to be listed on our application will secure access to all of the resources necessary to pay the discounted charges for eligible services from funds to which access will be secured in the funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

¹ Certifications per FCC Forms 470, 471 and 486. <http://www.usac.org/si/tools/forms.aspx> 5/20/2014

¹Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184, E-Rate Modernization Order, FCC 14-99A1 Released on 7/23/2014 at p.125-128 . http://transition.fcc.gov/Daily_Releases/Daily_Business/2014/db0723/FCC-14-99A1.pdf (last visited July 31, 2014).

I authorize Kellogg & Sovereign® Consulting, LLC to post my Form 470 and, if applicable, Request for Proposal (RFP). Unless I am purchasing eligible services exempt from the competitive bidding requirement, I certify that a FCC Form 470 will be posted and that any related RFP will be made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted will be carefully considered and the most cost-effective service offering will be selected, with price being the primary factor considered, and the most cost-effective means of meeting educational needs and technology goals.

I certify that I will review all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities I represent will comply with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on our applications have or will not have received anything of value or a promise of anything of value, other than services and equipment sought by means of forms filed with the Schools & Libraries Division, from the service provider, or any representative or agent thereof or any consultant in connection with our request for services.

I certify that I and the entity(ies) I represent will comply with all program rules, including recordkeeping requirements, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There will be signed contracts or other legally binding agreements covering all of the services listed on our FCC Forms 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least **10 years** (or whatever retention period is required by the rules in effect at the time of this certification), after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

I certify that I am authorized to order supported services for the eligible entity(ies) I represent. I certify that I am authorized to sign this Letter of Agency and all information to be provided to Kellogg & Sovereign® Consulting, LLC for the E-Rate submission will be true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to the associated applications have complied with the terms, conditions, and purposes of this program, that no kickbacks were or will be paid to anyone and that false statements on FCC forms can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that all pricing and technology infrastructure information submitted as part of an FCC Form 471 shall be treated as public and non-confidential by the Administrator unless the applicant specifies a statute, rule, or other restriction, such as a court order or an existing contract limitation barring public release of the information. I certify that contracts and other agreements will not prohibit disclosure of pricing or technology infrastructure information.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities that will be listed on our application, or any person associated in any way with my entity and/or the entities listed on our application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the funding requests listed on our FCC forms are for discounts for products or services that contain both eligible and ineligible components that Kellogg & Sovereign® Consulting, LLC on our behalf will allocate the cost of the contract to eligible and ineligible components as required by the Commission's rules at 47 C.F. R. § 54.504.

I certify that the non-discount portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services featured on the applicable FCC forms will be net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

I certify that prior to the commencement of service, the school(s) I represent will be in compliance with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l).

I certify that I am authorized to sign this Letter of Agency and, to the best of my knowledge, information and belief, all information provided to KSLLC for E-Rate submission is true. If any of the statements made above are incorrect, fraudulent or misleading, the undersigned and their institution agrees to indemnify, as allowed by state law, KSLLC, its members, employees and agents of any and all liability, legal fees or actions that may arise from the incorrect, fraudulent or misleading statement(s).

Applicant Name, City, State: Southeastern Pub Lib Sys of OK, McAlester, OK

Signature of Authorized Person: Michael Hull Date: 12/17/2015

Printed Name of Authorized Person: Michael Hull Title: CEO

This authorization shall remain in effect until KSLLC is notified of its cancellation in writing via certified mail.

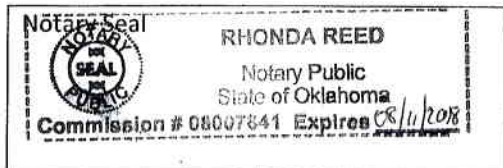
SWORN AFFIDAVIT

STATE OF Oklahoma)
) ss.
COUNTY OF Pittsburg)

On this 17 day of December, 2015, before me, the subscriber, a Notary Public in and for said State and

County, personally appeared Michael Hull, known or identified to me to be the person whose name is subscribed to this Letter of Agency, and acknowledged that he/she is authorized on behalf of said entity/entities to execute all documents pertaining hereto and acknowledged to me that he/she executed the same as his/her voluntary act and deed on behalf of said organization.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my seal in said State and County on the day and year last above written.



Rhonda Reed
(Signature of Notary)

My Commission Expires: 08/11/2018