Duval County Public Schools

1701 Prudential Drive

Jacksonville, FL 32207

January 23, 2018

Marlene H. Dortch, Secretary

Federal Communications Commission

Office of the Secretary

445 12th Street, SW

Washington, DC 20554

Entity & BEN Duval County Public School District (BEN 127591)

Contact Person David J. Neugent – Telecom Supervisor & E-Rate Manager

Contact Information [neugentd@duvalschools.org](mailto:neugentd@duvalschools.org)

Mailing Address 4019 Boulevard Center Dr. 3002A, Jacksonville, FL 32207

Funding Year 2017-2018

Application Type & Application Form 471 # 171028668

FRN 1799061475.01, .02, .03

Category of Service: Telecommunications Service

Service Provider AT&T Mobility SPIN 143025240

Docket No. 17-6

**Appeal Summary**

Upon submitting an original application for funding, Duval County Public Schools received a denial, and submitted evidence and narratives to support why this denial should be overturned as requested. Upon the initial denial, evaluation of the appeal documentation and summarization, and after verbally discussing the district’s actions.

As with the first denial, Duval County Public Schools affirms its position this application and funding should be approved without delay. The process followed by Duval County Public Schools aligns with USAC’s goals to help organizations secure access to affordable services, and keeping our stakeholders connected. Duval County Public Schools considers the following reasons as to why this appeal should be approved:

**Explanation for Denial given by USAC:**

The following summarized responses correlate to each funding commitment decision explanation. . Per the FCC Order 14-99, individual data plans and air cards are ineligible unless applicants can demonstrate either that installing a wireless local area network is not physically possible or that individual data plans are the most cost-effective option. You have not demonstrated that either of the two exceptions applies to services requested in FRN . Therefore, FRN 1799061475 is denied since services requested are ineligible.

**Duval County Public School District supplied updated information that Wireless LAN signal was not available for users since they were not located within range of WiFi range on school property in its 471 filing for funding. This information was supplied again in PIA review which once again was not found acceptable for USAC for the basic same reasons as sighted above.**

**Appeal Request**

1. Duval County Public Schools asks the FCC grant a waiver to its rule about Aircards not being an eligible service because Wireless Local network signal cannot reach the users. That being the case Aircards are the only solution to reach the users needing data service to reach the Duval County Public School resources on the WAN/LAN thru an APN aircard configuration.

1799061475.001

1. The users in question are 88 School Resource Officers of DCPS Police of Duval County Public Schools that are on the WAN/LAN. These Police are roaming around the School(s) do not have direct access to WiFi signal on campuses therefore the only way to reach them is with Aircards @ 4G speeds. The current configuration does not allow for voice only Data @ 4G upload @ 4.1 Mb and download @ 9.1Mb

1799061475.002

1. The users in question are 55 Students in need of Resources of Duval County Public Schools that are on the WAN/LAN. These students do not have direct access to WiFi signal on campuses therefore the only way to reach them is with Aircards @ 4G speeds. The current configuration does not allow for voice only Data @ 4G upload @ 4.1 Mb and download @ 9.1Mb

1799061475.003

1. The users in question are 116 Students in need of Resources of Duval County Public Schools that are on the WAN/LAN. These students do not have direct access to WiFi signal on campuses therefore the only way to reach them is with Aircards @ 4G speeds. The current configuration does not allow for voice only Data @ 4G upload @ 4.1 Mb and download @ 9.1Mb
2. **No Voice calls** are carried over this Laptop Connect USB Aircards via 4GB speeds.
3. USAC has twice denied 471 funding with supplied FRN information appeal directly to FCC was deemed to be best step to meet user’s needs.

Consistent with DA 05-2179 CC Docket No. 02-6

Duval County Public Schools shows no evidence of waste, fraud or abuse requests that sections 54.504(c) of Commission’s rules be waived and that these FRNs be approved for funding consideration with Aircards as eligible service in these circumstances of lack of Wifi or Hardwire LAN/WAN availability.