February 2, 2018

Federal Communications Commission
445 12th Street SW
Washington, DC, 20554

CAVE CITY PUBLIC SCHOOLS
SUPPLEMENTAL INFORMATION FOR REQUEST FOR REVIEW AND PETITION FOR WAIVER

Applicant:	Cave City Public School District
Billed Entity Number:	139623
Funding Year:	2017
FCC Form 471 Application Number:	171003692
Funding Request Numbers:	1799006128

December 11, 2014 - We posted FCC Form 470 Number #121050001269982 requesting bids for internet services at four district locations. This form had an allowable contract date of January 8, 2015.

January 27, 2015 – We signed a three-year contract with Southwestern Bell Telephone Company for Internet services on January 27, 2015.

February 26, 2015 – FCC Form 471 #1014756 was certified. It erroneously listed two FRNs for Internet service from Southwestern Bell Telephone Company (FRNs 2753893 and 2754265).

The two FRNs for the same service was the result of unfamiliarity with the system and a feeling of needing to error on the side of caution. Our error was due, in part, to our unfamiliarity with EPC. We did not have an E-rate consultant, and only had one staff member trying to learn a new system that added more complexity to an already confusing process.

FRN 2753893 listed the correct FCC Form 470, but due to a clerical error, the contract award date was listed as Feb 5, 2015 instead of January 27, 2015.

FRN 2754265 was also funded, but no discounts were sought or disbursed for this FRN. An FCC Form 500 has been prepared to cancel this FRN.

March 8, 2017 - We submitted our funding year 2017 FCC Form 471 Application Number #171003692 referencing the above-mentioned contract. This form included a clerical error that listed the wrong FCC Form 470.

June 2, 2017 - We received a PIA request in EPC. USAC attempted to confirm that the Form 470 listed on the application was correct, as it did not reference data transmission and/or internet access services. We informed USAC that the Form 470 number listed on the application was *not* the correct form.

June 6, 2017 - We received notification that USAC had denied the internet access funding request entirely because, according to USAC, the "Form 470 did not support the request."

Fall 2017 - We appealed the funding commitment decision with USAC. USAC modified the above-mentioned contract information as it appears in EPC and associated the contract with FCC Form #160028464. This Form 470 was a Funding Year 2016 form and *should not* have been listed as the establishing FCC Form 470 for this contract.

November 29, 2017 - We were notified that USAC denied the appeal; however, the reason for the denial was based on a different violation than the one identified in the June 6, 2017 funding commitment decision letter. The denial this time was due to "not comply(ing) with the competitive bidding requirement that your FCC Form 470 be posted on the website for 28 days prior to signing a contract(.)" It was at this point that realized that another error was made during the attempts to list the correct FCC Form 470.

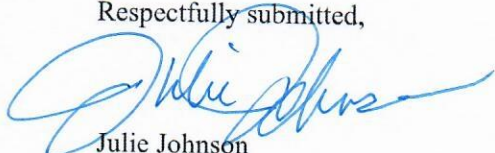**January 26, 2018** – We filed an appeal with the FCC.

January 30, 2018 - We were asked to submit additional information explaining why there were multiple FRNs for the same Internet service on FCC Form 471 #1014756.

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We acknowledge that we made several clerical errors. While the errors may have led USAC to believe we violated program rules, the mistakes were clerical in nature and in no way demonstrated an attempt to defraud the program. We followed the program's competitive bidding rules -- posting a Form 470, waiting the required 28 days before entering into an agreement -- but unfortunately selected the wrong form on the funding year 2017 application.

RELIEF SOUGHT
Cave City School District respectfully requests that the Commission reverse the funding commitment decision and update the Form 471 with the correct contract and Form 470 information.

Respectfully submitted,

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Director of Technology

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