

Appeal

CC Docket# 02-6

Applicant Name: **Bannockburn School District 102**

Entity Number: **135223**

Funding Year: 2017-18

CONTACT INFORMATION

Contact Person: John Hughes
Contact Information:
Email: john@cas-erate.com
Phone: 910-333-6870
Fax: 910-653-1669
Address: 4438 Glensacpe Ln SE
Southport, NC 28461

APPLICANT INFORMATION

Applicant Name: St Michael School
BEN: 27239
Application #: 191037705

Denial of RAL requesting the addition of a FRN due to a clerical/ministerial error

**This is a request for a Funding Commitment Decision Letter
St Michael School**

Appeal Request: Allow for FRN to be added to application which was left off due to clerical error

Form 471 Information: **191037705**

Funding Request Number(s):

FRN: to be added

TOTAL Dollar Amount Requested: \$5,567.20

Service Provider Name: Fullnet Advanced Communications, LLC
Service Provider Identification Number: 143037473

Reason for Denial: "Your appeal has been denied. During Program Integrity Assurance (PIA) review) of your FCC Form 471 191037705 you requested that a new funding request be added to your application. Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms (including adding a funding request) until an Funding Commitment Decision Letter (FCDL) is issued. Since you could not substantiate that the omission of a funding request was a result of a ministerial or clerical error, USAC denied your request to add an Funding Request Number (FRN) to your application after filing of the FCC Form 471 191037705."

Rationale for Request and timeline for application and RAL:

2/20/19- 470 #190026204 was filed. The 470 requested bids for cabling and other C2 items. See Attachment "A"

3/26/19- Quote was received on 3/21/19 and was awarded to ACC on 3/26/19. See attachment "C". See attachment "F" for contract 291462.

03/27/19- 471 #191037705 was filed. See Attachment "B". FRN for cabling was left off application due to clerical error.

05/06/19- RAL #24591 was filed requesting that FRN be added for cabling. RAL included an updated quote dated 04/05/19. Applicant accepted original quote dated 03/21/19 but submitted later quote in error. See attachment "D".

07/23/19- PIA reviewer asked specific questions about Clerical error. Applicant responded on 07/24/19 to all questions. See Attachment "E". **No additional questions or documentation were requested for clarification of clerical/ministerial error.**

08/29/19- FCDL was issued without funding new FRN. See Attachment "G". Reason given was "failure to provide source documentation". Source documentation and FRN details were provided during PIA and no additional documentation was requested. See attachment "E".

08/30/19- Appeal was filed with USAC. See attachment "H"

10/16/19- RFCDL was issued without asking applicant any review questions. See Attachment "I". The appeal was denied because applicant could not "substantiate that the omission of a funding request was a result of a ministerial or clerical error".

Circumstances to Consider

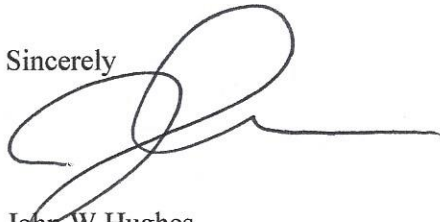
The applicant made a clerical error in omitting an FRN from application. Applicant properly selected vendor before filing 471. Applicant believed they provided necessary documentation during PIA review and audit process but was never asked any follow up questions for additional information or clarification. Applicant believes that if they had been given the chance to provide additional information and had received additional communication from USAC that the FRN would have been added as a clerical error.

Remedy Requested

This request of appeal is being made on behalf of St Michael School. USAC should be directed to review the decision to deny RAL request to add FRN and applicant should be given the opportunity to provide any necessary documentation.

Your favorable consideration of this matter is greatly appreciated.

Sincerely

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line.

John W Hughes
Contracted Consultant for St Michael School
Communications Audit Services
910.333.6870

Records / FCC Forms 470

St Michael 470 - #190026204

Summary Generated Documents News Related Actions

Attachment "A"

Please note: The following fields pull the most current data from the Contact User Profile and Applicant Entity Profile: Recipient(s) of Service, Contact Name, and Contact Phone Number. If you would like to review this FCC Form 470 with the data that was present upon certification, please navigate to the Generated Documents related dashboard on the left-hand side and click the Original Version document link.

Application Information

Nickname St Michael 470	Created Date 2/20/2019 6:48 PM EST
Application Number 190026204	Created By John Hughes
Funding Year 2019	Certified Date 2/20/2019 7:00 PM EST
Status Certified	Certified By John Hughes
Allowable Contract Date 3/20/2019	Last Modified Date 2/20/2019 7:00 PM EST
	Last Modified By John Hughes

Billed Entity Information

Name ST MICHAEL SCHOOL **Billed Entity Number (BEN)** 27239

Application Type and Recipients of Service

Applicant Type School **Number of Eligible Entities** 1

Recipient(s) of Service ☐ Private School

Contact Information

Name John W Hughes **Phone Number** 919-968-4332

Email jhughes@vistatm.com

Services Requested

Category 1: Data Transmission and/or Internet Access

Type	Function	Function Other Description	Number Entities	Quantity	Unit	Min Capacity	Max Capacity	Installation and Initial Configuration?	Associated RFP
Data Transmission and/or Internet Access	Leased Lit Fiber (with or without Internet Access)		1	1	Circuits	25 Mbps	100 Mbps	Yes	
Data Transmission and/or Internet Access	Internet Access and Transport Bundled (Non-Fiber)		1	1	Circuits	25 Mbps	100 Mbps	Yes	

Category One Narrative

Internet access up to 100 Mbs. Questions concerning the specifications of services described in this 470 should be addressed to the person listed as main contact and should be made ONLY by email. Only bids that conform with FCC mandated LCP will be considered. All bids should plainly delineate E-Rate eligible and non-eligible items. Bids that take advantage of consortia/contract pricing are encouraged.

Category 2: Internal Connections and Managed Internal Broadband Services

Type	Function	Number Entities	Quantity	Unit	Manufacturer	Manufacturer Other Description	Installation and Initial Configuration?	Associated RFP
Internal Connections	WAP		35	Each	Meraki or equivalent		Yes	
Internal Connections	Switches		2	Each	Meraki or equivalent		Yes	
Internal Connections	Cabling	1	12000	Feet	No Preference		Yes	

Type	Function	Number Entities	Quantity	Unit	Manufacturer	Manufacturer or Other Description	Installation and Initial Configuration ?	Associated RFP
Internal Connections	Firewall Service and Components		1	Each	Meraki or equivalent		Yes	
Basic Maintenance of Internal Connections	Firewall Service and Components	1	1	Each	Meraki			
1 - 5 of 6								

Category Two Narrative

MR33 or equivalent access points, MS225 or equivalent switches, 10 Gbs fiber link between switches, 12000 ft of Plenum Cat5 cable. All quantities are estimates. To include all patch panels, patch cords, connectors and any other equipment as deemed necessary to complete up[grades. Management of existing network equipment. Questions concerning the specifications of services described in this 470 should be addressed to the person listed as main contact and should be made ONLY by email. Only bids that conform with FCC mandated LCP will be considered. All bids should plainly delineate E-Rate eligible and non-eligible items. Bids that take advantage of consortia/contract pricing are encouraged.

Technical Contact Information

A technical contact has not been indicated

State or Local Procurement Requirements

State or Local Procurement Requirements have not been indicated

Attachment "B"



Universal Service
Administrative Co.

Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname 2019 St Michael (WV) C-2 471
Funding Year 2019

Application Number 191037705
Category of Service Category 2

Billed Entity

ST MICHAEL SCHOOL
1221 NATIONAL RD WHEELING WV 26003 - 5707
304-242-3966

Contact Information

John W Hughes IV
919-968-4332
info@newhopetech.net

Billed Entity Number 27239
FCC Registration Number 0012612990
Applicant Type School

Holiday/Summer Contact Information Available all summer

Consulting Firms

Name	Consultant Registration Number	City	State	Zip Code	Phone Number	Email
New Hope Technology Foundation	16054699	Chapel Hill	NC	27514	919-968-4332	jhughes@newhopetech.org

Entity Information

School Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
27239	ST MICHAEL SCHOOL	Urban				N/A	Private School	None

School Entity - Discount Rate Calculation Details

BEN	Name	Urban/Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
27239	ST MICHAEL SCHOOL	Urban	0	N/A	

Related Entity Information

Discount Rate

School Enrollment	School NSLP Count	School NSLP Percentage	School Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate
257	80	31.0%	Urban	50%	50%

Funding Request for FRN #1999068381

Funding Request Nickname: Network Upgrade
Service Type: Internal Connections

Agreement Information - Contract

Contract Number	KLTK146	Account Number	
Establishing FCC Form 470	190026204	Service Provider	CDW Government LLC (SPN: 143005588)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	March 26, 2019	Based on a multiple award schedule?	No
How many bids were received for this contract?	1	Includes Voluntary Extensions?	No
What is the service start date?	July 01, 2019	Remaining Voluntary Extensions	
		Total Remaining Contract Length	
		What is the date your contract expires for the current term of the contract?	September 30, 2020

Document Name	Document Description
Scan_0043.pdf	

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative Network upgrade

Line Item # 1999068381.001

Product and Service Details

Type of Internal Connection	Wireless Data Distribution	Type of Product	Access Point
Make	Meraki	Model	MR33-HW
Is installation included in Price?	No	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1999068381.001

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$168.41
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$168.41
One-time Quantity	x 35
Total Eligible One-time Costs	= \$5,894.35
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$5,894.35
Pre-Discout Extended Eligible Line Item Cost	= \$5,894.35

Recipients of Services

BEN	Name	Amount
27239	ST MICHAEL SCHOOL	\$5,894.35

Line Item # 1999068381.002

Product and Service Details

Type of Internal Connection	License	Type of Product	License
Make	Meraki	Model	LIC-ENT-3YR
Is installation included in Price?	No	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1999068381.002

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$77.85
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$77.85
One-time Quantity	x 35
Total Eligible One-time Costs	= \$2,724.75
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$2,724.75
Pre-Discout Extended Eligible Line Item Cost	= \$2,724.75

Recipients of Services

BEN	Name	Amount
27239	ST MICHAEL SCHOOL	\$2,724.75

Line Item # 1999068381.003

Product and Service Details

Type of Internal Connection	Data Protection	Type of Product	Firewall Services & Components
Make	Meraki	Model	MX84-HW WITH LIC-MX84-ENT-3YR
Is installation included in Price?	No	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1999068381.003

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$1,036.66
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$1,036.66
One-time Quantity	x 1
Total Eligible One-time Costs	= \$1,036.66
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$1,036.66
Pre-Discout Extended Eligible Line Item Cost	= \$1,036.66

Recipients of Services

BEN	Name	Amount
27239	ST MICHAEL SCHOOL	\$1,036.66

Line Item # 1999068381.004

Product and Service Details

Type of Internal Connection	Data Distribution	Type of Product	Switch
Make	Meraki	Model	MS210-24P-HW WITH LIC-MS210-24P-3YR
Is installation included in Price?	No	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1999068381.004

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$1,060.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$1,060.00
One-time Quantity	x 2
Total Eligible One-time Costs	= \$2,120.00
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$2,120.00
Pre-Discount Extended Eligible Line Item Cost	= \$2,120.00

Recipients of Services

BEN	Name	Amount
27239	ST MICHAEL SCHOOL	\$2,120.00

Line Item # 1999068381.005

Product and Service Details

Type of Internal Connection	Miscellaneous	Type of Product	Fees, Taxes, etc.
Make	Other	Model	SHIPPING
Is installation included in Price?	No	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1999068381.005

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$110.78
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$110.78
One-time Quantity	x 1
Total Eligible One-time Costs	= \$110.78
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$110.78
Pre-Discount Extended Eligible Line Item Cost	= \$110.78

Recipients of Services

BEN	Name	Amount
27239	ST MICHAEL SCHOOL	\$110.78

FRN Calculation for FRN #1999068381

Monthly Charges	
Total Monthly Recurring Charges	\$0.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$0.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$0.00

One-Time Charges	
Total One-Time Charges	\$11,886.54
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$11,886.54

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$0.00
Total Eligible Pre-Discount One-Time Charges	+ \$11,886.54
Total Pre-Discount Charges	= \$11,886.54
Discount Rate	50%
Funding Commitment Request	= \$5,943.27

Funding Request for FRN #1999069857

Funding Request Nickname: Install

Service Type: Internal Connections

Agreement Information - Contract

Contract Number		Account Number	
Establishing FCC Form 470	190026204	Service Provider	SLD INTERIM (SPN: 143666666)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	March 26, 2019	Based on a multiple award schedule?	No
How many bids were received for this contract?	1	Includes Voluntary Extensions?	No
What is the service start date?	July 01, 2019	Remaining Voluntary Extensions	
		Total Remaining Contract Length	
		What is the date your contract expires for the current term of the contract?	September 30, 2020

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative Installation

Line Item # 1999069857.001

Product and Service Details

Type of Internal Connection	Miscellaneous	Type of Product	Installation, Activation, & Initial Configuration
Make	Other	Model	Install and config
Is installation included in Price?	Yes	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1999069857.001

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$4,000.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$4,000.00
One-time Quantity	x 1
Total Eligible One-time Costs	= \$4,000.00
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$4,000.00
Pre-Discout Extended Eligible Line Item Cost	= \$4,000.00

Recipients of Services

BEN	Name	Amount
27239	ST MICHAEL SCHOOL	\$4,000.00

FRN Calculation for FRN #1999069857

Monthly Charges	
Total Monthly Recurring Charges	\$0.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$0.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$0.00

One-Time Charges	
Total One-Time Charges	\$4,000.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$4,000.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$0.00
Total Eligible Pre-Discount One-Time Charges	+ \$4,000.00
Total Pre-Discount Charges	= \$4,000.00
Discount Rate	50%
Funding Commitment Request	= \$2,000.00

Certifications

I certify that the entities listed in this application 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 I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, 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 listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current 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).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	\$15,886.54
Total funding commitment request amount on this FCC Form 471	\$7,943.27
Total applicant non-discount share of the eligible amount	\$7,943.27
Total budgeted amount allocated to resources not eligible for E-rate support	\$35,000.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$42,943.27
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share?	No

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied 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 this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 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 later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. 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 USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form 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 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 listed on this application, or any person associated in any way with my entity and/or the entities listed on this 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 on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

Title:	Senior Consultant	Name:	John W Hughes IV
Phone:	919-968-4332	Email:	info@newhopetech.net
Address:	1829 E Franklin St Ste 800E Chapel Hill NC 27514	Employer:	New Hope Technology Foundation

Certified Timestamp

27-Mar-2019 06:45:30 EDT



Attachment 2

**WHEELING/PARKERSBURG/CLARKSBURG
CHARLESTON/BECKLEY**

Advanced Communications Company – Wheeling
PO Box 6650
Wheeling, WV 26003

TEL: 304.233.3000
FAX: 304.233.9666
email: jhartle@acccentral.com

WV Lic # WV013681

March 21, 2019

PROPOSAL SUBMITTED TO:

St. Michael Parish Church
Attn: Kim Burge
1221 National Rd,
Wheeling, WV 26003
Phone: (304) 242-3966

INSTALL EQUIPMENT AT:

Same

CAT 6 WIFI Cabling Proposal:

Scope of Work:

- ACC will pull Category 6 cabling to thirty-five (35) locations for WIFI.
- ACC will install wire mold where necessary to hide cable not in drop ceiling
- ACC will terminate ends on surface-mount jacks in ceiling.
- ACC will provide thirty-five, 1-foot patch cables for Access Points
- ACC will install two 24-port patch panels in existing data racks and terminate cabling
- ACC will use existing fiber cable to connect MDF and IDF where patch panels will be installed
- ACC will install thirty-five (35) customer provided WIFI Access Points
- ACC will label and test all cabling

Material:

- (Lot) Category 6 Data Cable
- (2) 24-Port Patch Panel
- (35) Category 6 Inserts
- (35) 1-foot patch cords
- (35) Surface-mount jack boxes
- (Lot) Wire Mold

TOTAL COST FOR THE ABOVE: \$ 13,918.00

Price Above Includes The Following:

- ▶ 1-Year Limited Warranty on Parts & Labor
- ▶ Installation, Programming & Training

NOTE: These prices do not include state sales and service tax. Cash purchase requires 25% down, balance due 15 days from the date of installation. This quote is valid for 30 days from the date on the quote. If Tax Exempt, please provide certificate.

ACCEPTANCE: I have read and I agree to the above terms of this agreement and hereby authorize you to complete this work.

(Authorized Signature)

Please sign, forward the original to us and keep a copy for your file
ADVANCED COMMUNICATIONS COMPANY

Date: _____
Jim Hartle, Sales Manager



Attachment D

**WHEELING/PARKERSBURG/CLARKSBURG
CHARLESTON/BECKLEY**

Advanced Communications Company – Wheeling
PO Box 6650
Wheeling, WV 26003

TEL: 304.233.3000
FAX: 304.233.9666
email: jhartle@acccentral.com

WV Lic # WV013681

April 5, 2019

PROPOSAL SUBMITTED TO: **St. Michael Parish Church**
Attn: Jordan Chilensky
1221 National Rd,
Wheeling, WV 26003
Phone: (304) 242-3966

INSTALL EQUIPMENT AT: Same

CAT 6 WIFI Cabling Proposal:

Scope of Work:

- ACC will pull Category 6 cabling to thirty-five (35) locations for WIFI.
- ACC will install wire mold where necessary to hide cable not in drop ceiling
- ACC will terminate ends on surface-mount jacks in ceiling.
- ACC will provide thirty-five, 1-foot patch cables for Access Points
- ACC will install two 24-port patch panels in existing data racks and terminate cabling
- ACC will use existing fiber cable to connect MDF and IDF where patch panels will be installed
- ACC will install thirty-five (35) customer provided WIFI Access Points
- ACC will label and test all cabling

Material:

- (Lot) Category 6 Data Cable
- (2) 24-Port Patch Panel
- (35) Category 6 Inserts
- (35) 1-foot patch cords
- (35) Surface-mount jack boxes
- (Lot) Wire Mold

TOTAL COST FOR THE ABOVE: \$ 13,918.00

Price Above Includes The Following:

- ▶ 1-Year Limited Warranty on Parts & Labor
- ▶ Installation, Programming & Training

NOTE: These prices do not include state sales and service tax. Cash purchase requires 25% down, balance due 15 days from the date of installation. This quote is valid for 30 days from the date on the quote. If Tax Exempt, please provide certificate.

ACCEPTANCE: I have read and I agree to the above terms of this agreement and hereby authorize you to complete this work.

(Authorized Signature)
Please sign, forward the original to us and keep a copy for your file
ADVANCED COMMUNICATIONS COMPANY

Date: _____
Jim Hartle, Sales Manager

2019 St Michael (WV) C-2 471 - #191037705

Attachment 'E'

RESPOND TO INQUIRIES

[Summary](#)
[Funding Requests](#)
[Review Inquiries](#)
[Discount Calculation](#)
[Entity Information](#)
[News](#)
[Related Actions](#)

Pending Inquiries

Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date	Due Date	Extn.	Status
No Pending Inquiries.										

Submitted Inquiries

Name	Outreach Type	Answered By	Assigned Date	Answered Date
Eligibility of Products and Services	Modification Notification	John Hughes IV	8/24/2019 11:29 AM EDT	8/30/2019 8:24 AM EDT
Eligibility of Products and Services	Modification Notification	John Hughes IV	8/24/2019 11:22 AM EDT	8/30/2019 8:24 AM EDT
Other Issues	Summer 15-Day	John Hughes IV	7/29/2019 11:58 AM EDT	7/31/2019 9:03 AM EDT
Eligibility of Products and Services	Summer 15-Day	John Hughes IV	7/29/2019 11:58 AM EDT	8/14/2019 10:34 AM EDT
Ministerial and Clerical Errors	Regular 15-Day Incomplete Response Reminder	John Hughes IV	7/23/2019 12:10 PM EDT	7/24/2019 9:15 AM EDT
Service Provider Issues	Summer 15-Day	John Hughes IV	7/18/2019 2:36 PM EDT	7/22/2019 9:46 AM EDT
Category Two Budget	Summer 15-Day	John Hughes IV	7/18/2019 2:36 PM EDT	7/22/2019 10:07 AM EDT
Ministerial and Clerical Errors	Regular 15-Day	John Hughes IV	7/8/2019 1:00 PM EDT	7/22/2019 9:45 AM EDT
8 items				

Ministerial and Clerical Errors

Issue

USAC's Program Integrity Assurance (PIA) team is currently reviewing your FCC Form 471 application, and we have identified an issue that we need you to help us resolve.

What is the issue?

You are requesting to add a funding request for Cabling, SPIN 143051505 See <http://www.usac.org/sl/applicants/step01/clerical-errors.aspx> for additional information on Ministerial and Clerical (M&C) errors.

Please read all of the questions, descriptions, and requests below. Please give enough detail, insight, and clarity to help the reviewers fully understand your specific situation.

Check the boxes for statements that apply, and where applicable, type the information requested into the text boxes. If your information is too detailed for the text box, or if you need to provide additional documentation, click "Browse" to upload relevant files or documentation.

Question(s)

This page will timeout after an extended period of inactivity. Please periodically save your work using the 'Save & Close' button below. You may then use your browser's 'Back' button to return to your work.

Your responses to PIA's Questions:

#	Question	Response
1	Do you wish to add an FRN to your application?	Yes

#	Question	Response
a	<p>If No, please select the checkbox.</p> <p>No further information is required and no changes will be made to your FCC Form 471.</p>	<input type="checkbox"/>
b	<p>If Yes, please select the checkbox.</p> <p>Please provide the following:</p>	<input type="checkbox"/>
	<p>The source documentation (e.g. vendor bills, contract, service agreement, etc.) used to prepare our FCC Form 471 application.</p>	Scan_0021.pdf
	<p>The following missing Funding Request information including FCC Form 470 Number, SPIN, Costs, etc. Vendor documentation detailing the associated costs.</p>	New FRN for Application.pdf
2	<p>If you would like to provide any additional information about these issues that have not been addressed above, please use the text box to type in the information. If you would like to provide any additional documentation, please use Add Document button to upload your documentation.</p>	NA

[CLOSE](#)

Attachment to Attachment E

New FRN for Application #191037705

Funding Request nickname: Cabling

Service Type: Internal Connections

Contract ID# 291462

Contract expires: 09/30/20

Product & Service Details

Type of Internal connection: Cabling

Type of Product: Cabling

Make: Other-Advanced Communications Company

Is installation included: yes

Monthly cost-\$0

One-time Cost-\$13,918.00

Ineligible Cost- \$0

One-time Unit cost- \$13,918

One-time quantity- 1

Total Eligible cost- \$13,918.00

Attachment F

Records / Applicant Entities

#27239 - ST MICHAEL SCHOOL

MANAGE CONTRACTS

- Summary
- Customer Service
- Modifications
- Additional Information
- Discount Rate
- Category Two Budget
- Contracts
- FCC Forms
- FRN Appeals
- News
- Related Actions

Submitted Contracts / Contract #291462

Contract #291462

Contract Information

Nickname	2019 ACC	Contract ID	291462
Can Other Applicants Piggy Back Off This Contract?	No	Contract Number	St Michael
Piggy Backed Off Another Contract?	No	Based on a State Master Contract?	No
		Based on a Multiple Award Schedule?	No

Establishing FCC Form 470

Establishing FCC Form 470	#190026204	Number of Bids Received	1
---------------------------	------------	-------------------------	---

Service Provider

Service Provider	Fullnet Advanced Communications Inc. (SPIN: 143037473)	Account Number	3042423966
------------------	--------------------------------------------------------	----------------	------------

Contract Dates

Award Date	3/26/2019	Multi-Year Contract?	No
Includes Voluntary Extensions?	No		

Pricing Confidentiality

There is no rule, statute, or other restriction which prohibits publication of the specific pricing information for this contract.

Supporting Documents

Document	Description
Scan_0021	





Universal Service
Administrative Co.

Attachment "G"

August 29, 2019

Funding Commitment Decision Letter

Funding Year 2019

Contact Information:

John Hughes
ST MICHAEL SCHOOL
1221 NATIONAL RD
WHEELING, WV 26003
jhughes@vistatm.com

FCC Form 471: 191037705

BEN: 27239

Wave: 19

Application Nickname: 2019 St Michael (WV) C-2
471

Totals

Total Committed	\$7,280.82
------------------------	-------------------

What is in this letter?

Thank you for submitting your application for Funding Year 2019 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the funding statuses for the FCC Form(s) 471, Services Ordered and Certification Form, that you submitted and referenced above.

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying the full cost for the services you receive.
2. Review the [Children's Internet Protection Act \(CIPA\)](#) requirements and file the [FCC Form 486](#) (Service Confirmation and CIPA Certification Form). **The deadline to submit this form is 120 days from the date of this letter or from the service start date (whichever is later).**



BEN Name: ST MICHAEL SCHOOL
BEN: 27239

FCC Form 471: 191037705
Wave: 19

Funding Commitment Decision Overview

Funding Year 2019

Application Comments for FCC Form 471: #191037705

Some RAL changes could not be processed. Please see your FRN-level comments for additional details regarding why these changes could not be processed.

Funding Commitment Decision Overview

Funding Request Number (FRN)	Service Provider Name	Amount Requested	Amount Committed	Status
1999068381	CDW Government LLC	\$5,943.27	\$4,650.82	Funded
1999069857	Jordan P. Chilensky	\$2,000.00	\$2,630.00	Funded



BEN Name: ST MICHAEL SCHOOL
BEN: 27239

FCC Form 471: 191037705
Wave: 19

FRN 1999068381	Service Type Internal Connections	Status Funded
--------------------------	---------------------------------------------	-------------------------

Dollars Committed			
Monthly Cost		One-time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$11,627.05
Total Pre-discount Charges		\$11,627.05	
Discount Rate		40.00%	
Committed Amount		\$4,650.82	

Dates	
Service Start Date	7/1/2019
Contract Expiration Date	9/30/2020
Contract Award Date	3/26/2019
Service Delivery Deadline	9/30/2020
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	CDW Government LLC
SPIN (498ID)	143005588
Contract Number	KLTK146
Account Number	
Establishing FCC Form 470	190026204

Consultant Information	
Consultant Name	John Hughes
Consultant's Employer	New Hope Technology Foundation
CRN	16054699

Funding Commitment Decision Comments

MR1: The applicant's request to Add FRN could not be processed because the change is not a correctable error under the FCC's Ministerial and Clerical guidelines. According to FCC Order (FCC 11-60), ministerial and clerical errors are defined as follows: "The applicant can amend its forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error." The applicant failed to supply source list. <><><><><> MR2: The amount



BEN Name: ST MICHAEL SCHOOL
BEN: 27239

FCC Form 471: 191037705
Wave: 19

of the funding request was changed from \$11,886.54 one time cost to \$11,627.05 one time cost to remove the 50 percent of the ineligible use of Cisco Meraki LIC-MX84-ENT-3YR .



BEN Name: ST MICHAEL SCHOOL
BEN: 27239

FCC Form 471: 191037705
Wave: 19

FRN 1999069857	Service Type Internal Connections	Status Funded
--------------------------	---------------------------------------------	-------------------------

Dollars Committed			
Monthly Cost		One-time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$6,575.00
Total Pre-discount Charges		\$6,575.00	
Discount Rate		40.00%	
Committed Amount		\$2,630.00	

Dates		Service Provider and Contract Information	
Service Start Date	7/1/2019	Service Provider	Jordan P. Chilensky
Contract Expiration Date	9/30/2020	SPIN (498ID)	143051505
Contract Award Date	3/26/2019	Contract Number	
Service Delivery Deadline	9/30/2020	Account Number	
Expiration Date (All Extensions)		Establishing FCC Form 470	190026204

Consultant Information	
Consultant Name	John Hughes
Consultant's Employer	New Hope Technology Foundation
CRN	16054699

Funding Commitment Decision Comments

MR1: The applicant's request to Add FRN could not be processed because the change is not a correctable error under the FCC's Ministerial and Clerical guidelines. According to FCC Order (FCC 11-60), ministerial and clerical errors are defined as follows: "The applicant can amend its forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the



BEN Name: ST MICHAEL SCHOOL
BEN: 27239

FCC Form 471: 191037705
Wave: 19

application, or making an arithmetic error." The applicant failed to supply source list. <><><><><> MR2: The FRN was modified from \$4,000 one time cost to \$6,575.00 one time cost to agree with the applicant documentation.

Records / Appeals

2019 new FRN - #162334

[Summary](#) [Associated FRNs](#) [News](#) [Related Actions](#)

Attachment "H"

In-Review

Outreach

Wave Ready

Committed

▼ Appeal Information

[View Status \(+\)](#)**Funding Year** 2019**Submitting Organization** ST MICHAEL SCHOOL (BEN: 27239)**Created By** John Hughes IV**Created On** 8/30/2019 8:54 AM EDT

▼ Main Contact

Name John Hughes IV**Email** john@jhughesfam.com**Phone Number** 847-422-3254

▼ Narrative

On 05/06 RAL #24591 was filed as a clerical error was made on 471 application #191037705. The applicant mistakenly left an FRN off of the application. During PIA review, applicant was asked questions about RAL on 07/08 and 07/23 (see attachment "A". Applicant responded within the allotted time period to both sets of questions and provided information for new FRN (attachment "B") as well as requested vendor documentation (attachment "C"). Applicant received no additional follow up questions or notifications in regards to request (attachment "A"). Application was then approved on 08/29 without the additional FRN. Applicant request that FRN be added to approval as per the documentation provided during PIA.

▼ Appeal Details

Decision appealed by applicant Funding Commitment Decision Letter

If you wish to modify or cancel your appeal, or, if you have any questions about your appeal, please contact the E-rate Program's Client Service Bureau (CSB) at (888) 203-8100.

[View Supporting Documentation \(+\)](#)



Universal Service
Administrative Co.

Attachment I

October 16, 2019

Revised Funding Commitment Decision Letter

Funding Year 2019

Contact Information:

John Hughes
ST MICHAEL SCHOOL
1221 NATIONAL RD
WHEELING, WV 26003
jhughes@vistatm.com

BEN: 27239

Post Commitment Wave: 12

Totals

Original Commitment Amount	\$7,280.82
Revised Commitment Amount	\$7,280.82

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2019 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- Appeals
- Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).



BEN Name: ST MICHAEL SCHOOL

BEN: 27239

Post Commitment Wave: 12

Post Commitment Request Number: 162334	Post Commitment Request Type: Appeals	Post Commitment Decision: Denied
--------------------------------------------------	-------------------------------------------------	--------------------------------------------

FRN: 1999068381	Service Type: Internal Connections	Original Status: Funded	Revised Status: Funded
FCC Form 471: 191037705			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$11,627.05
Total Pre-Discount Charges		\$11,627.05	
Discount Rate		40.00%	
Revised Committed Amount		\$4,650.82	

Dates	
Service Start Date	7/1/2019
Contract Expiration Date	9/30/2020
Contract Award Date	3/26/2019
Service Delivery Deadline	9/30/2020
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	CDW Government LLC
SPIN (498ID)	143005588
Contract Number	KLTK146
Account Number	
Establishing FCC Form 470	190026204

Consultant Information	
Consultant Name	John Hughes
Consultant's Employer	New Hope Technology Foundation
CRN	16054699

Revised Funding Commitment Decision Comments:

Post Commitment Rationale:

Your appeal has been denied. During Program Integrity Assurance (PIA) review) of your FCC Form 471 191037705 you requested that a new funding request be added to your application. Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms (including adding a funding request) until an Funding Commitment Decision Letter (FCDL) is issued. Since you could not substantiate that the omission of a funding request was a result of a ministerial or clerical error, USAC denied your request to add an Funding Request Number (FRN) to your application after filing of the FCC Form 471 191037705. In your appeal, since your documentation was dated outside of the filing window you did not demonstrate that USAC's determination was incorrect. Your appeal requests additional funds that were not included in the FCC Form 471 that you are



BEN Name: ST MICHAEL SCHOOL
BEN: 27239
Post Commitment Wave: 12

Post Commitment Request Number: 162334	Post Commitment Request Type: Appeals	Post Commitment Decision: Denied
--------------------------------------------------	-------------------------------------------------	--------------------------------------------

FRN: 1999069857	Service Type: Internal Connections	Original Status: Funded	Revised Status: Funded
FCC Form 471: 191037705			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$6,575.00
Total Pre-Discount Charges		\$6,575.00	
Discount Rate		40.00%	
Revised Committed Amount		\$2,630.00	

Dates	
Service Start Date	7/1/2019
Contract Expiration Date	9/30/2020
Contract Award Date	3/26/2019
Service Delivery Deadline	9/30/2020
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	Jordan P. Chilensky
SPIN (498ID)	143051505
Contract Number	
Account Number	
Establishing FCC Form 470	190026204

Consultant Information	
Consultant Name	John Hughes
Consultant's Employer	New Hope Technology Foundation
CRN	16054699

Revised Funding Commitment Decision Comments:

Post Commitment Rationale:

Your appeal has been denied. During Program Integrity Assurance (PIA) review) of your FCC Form 471 191037705 you requested that a new funding request be added to your application. Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms (including adding a funding request) until an Funding Commitment Decision Letter (FCDL) is issued. Since you could not substantiate that the omission of a funding request was a result of a ministerial or clerical error, USAC denied your request to add an Funding Request Number (FRN) to your application after filing of the FCC Form 471 191037705. In your appeal, since your documentation was dated outside of the filing window you did not demonstrate that USAC's determination was incorrect. Your appeal requests additional funds that were not included in the FCC Form 471 that you are