

# Collect - Ed LLC

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September 25, 2018 October 25, 2018

Federal Communications Commission  
LETTER OF APPEAL  
Electronic Filing ([www.fcc.gov/ecfs/filings](http://www.fcc.gov/ecfs/filings))  
445 12th Street, SW  
Washington, DC 20554

RE: **CC Docket No. 02-6**  
**Schools and Libraries E-Rate Program**

Dear FCC APPEALS DEPARTMENT:

This **LETTER OF APPEAL**, Lawton Public Schools in the process of returning USAC funds payment \$22,062.68 for receipt of the USAC letter dated 9/19/2018, "Recovery of Improperly Disbursed Funding Letter". We disagree with USAC's decision, we believe to be in error. We are submitting this appeal to FCC for reconsideration of funding appeal based on Ministerial & Clerical Error (data entry error).

**REFERENCE: DOC #A – Recovery of Improperly Disbursed Funding; 8 pages**

We are seeking the following remedy for Lawton Public Schools:

- 1) a request to rescind the USAC decision "Recovery of Improperly Disbursed Funds" Letter dated 9/19/2018 \$22,062.68
- 2) Under the Ministerial & Clerical Error, allow ability to correct to the inadvertent data entry error with BEN correction, on FORM 471. The named entity listed on the FORM 471# 161016445; FRN# 1699029349, was a self-discovered error. In an effort to report the error for correction, USAC made a further decision to recover funding instead.
- 3) Allow the funding to be reinstated with BEN correction as detailed within. Request to allow BEAR form to be filed for reimbursement of funds back to the Lawton Public Schools
- 4) If required, a request seeking any necessary FCC WAIVER(s), to cover any issues with Ministerial & Clerical Error correction and/or Appeals, Invoice Deadline Extension and to request funding for LAWTON PUBLIC SCHOOLS, in seeking FCC appeal approval.

Our source documentation proves the intent of funding request and use of funds were within the rules, regulations and guidelines provided by USAC and the FCC.

Please note our contact information for any questions or concerns, you may have that pertains to this FCC APPEAL.

BILLED ENTITY #:	139876
BILLED ENTITY NAME:	LAWTON PUBLIC SCHOOL DIST
FORM 498	443006392
E-RATE CONSULTANT:	Machelle L. McKay
CONSULTING COMPANY	COLLECT-ED LLC
CRN#	16062522
ADDRESS	PO BOX 333 MUSTANG, OK
CONSULTANT PHONE:	(405) 830-2200
CONSULTANT FAX:	(501) 640-7815
CONSULTANT EMAIL:	<a href="mailto:collect-ed@hotmail.com">collect-ed@hotmail.com</a>



Page 2	FCC APPEAL 02-6	BEN#	139876
FUNDING YR	2016	ENTITY	LAWTON PUBLIC SCHOOLS
471 #	161016445	SPIN#	143015315
FRN#	1699029349	SERVICE PROVIDER	PRESIDIO NETWORKED SOLUTIONS INC.

Funding Year 2016-2017, was the first year FCC and USAC required all forms (470, 471, and 486) to be with the new EPC portal. USAC provided limited training, this Erate cycle was especially very stressful and frustrating to all users. Inadvertently data error was made, the FRN# 1699029349 named entity, Eisenhower High School (entity# 84027) – should have be entered as Eisenhower Elementary School (entity# 84031).

Due to the limitations with EPC limited views and no ability to preview “working form” during the data entry process, this Ministerial & Clerical Error was made.

Data entry error on the FORM 471 was not originally detected by Consultant, School, Service Provider or during the USAC PIA multiple review processes. This summer (2018), during our Erate planning session for upcoming 2019-2020 cycle, this error was discovered by self-examination & reconciliation of Category Two (C2) budget limits for future use.

Eisenhower Elementary School funding request was not recorded as we believed that we requested. Only to discover that Eisenhower High School was listed on the FORM 471 instead.

**REFERENCE: DOC #B – CAT2 budget worksheet; 8 pages, items are marked as discovery was made.**

Brief explanation of the FY 2016-2017 application process, to prove to USAC & FCC the funding requested was originally intended and benefit of use for Eisenhower Elementary School.

See attached FORM 470# 160005000

**REFERENCE: DOC #C – FORM 470 & attached Request for Proposal; 13 pages**

**NOTE: Eisenhower Elementary is specifically listed as the entity request for purchase and installation of Qty 16 wireless access points and Qty 3 – 48-port network switches. Eisenhower High School requested purchase and installation of the same products at different quantities.**

See attached Service Provider Contract (EPC Contract# 25646) and site specific products, installation services and costs for each site.

**REFERENCE: DOC #D – Presidio Networked Solutions LLC Proposal awarded 2/18/2016; 30 pages,**

**NOTE: Eisenhower Elem School cost = \$27,578.38 (see detailed equipment list page 4); same as requested on FORM 471 FRN# 1699029349**

**Eisenhower High School cost = \$ 81,590.10); same as requested on FORM 471 FRN# 1699029416**

See attached FY 2016-2017; FORM 471#161016445– USAC original document is 149 pages – I extracted the specifically FRN#1699029349 for Eisenhower Elementary School. Each site included specific products, installation services and costs for each site. These schools did not receive any equipment intended for another school, all equipment and services requested were completed at the correct school by the service provider.

**REFERENCE: DOC #E – FORM 471 # 161016445 only FRN# 1699029349; 14 pages,**

**NOTE: FRN# 1699029349 - Funding Request Nickname = “IC –PRESIDIO—EISENHOWER ELEM” was noted as the intended school for products and services listed**

**Narrative Description = “EISENHOWER ELEM – Wireless Access Points, switches and cabling” – also declared as the intended recipient school. However, the incorrect school entity# was selected in data entry error the individual line items – see the marked 471 form attached.**

See attached FY 2016-2017; APPEAL #107994 filed as soon as self-discovery of data entry error, as a FORM 471 Ministerial & Clerical Error – FRN# 1699029349. Submitted 6/8/2018

**REFERENCE: DOC #F – EPC USAC APPEAL #107994; 14 pages**

The appeal was filed to correct the FORM 471 Ministerial & Clerical Error, unintentionally tagged Eisenhower High School on the individual line items.

The intended beneficiary entity named Eisenhower Elem School (#84031)- (nickname & narrative referenced) for equipment and services, (reference DOC#E above).

Either USAC did not have authority to allow the correction or did not understand the appeal letter as expected.



Page 3	FCC APPEAL 02-6	BEN#	139876
FUNDING YR	2016	ENTITY	LAWTON PUBLIC SCHOOLS
471 #	161016445	SPIN#	143015315
FRN#	1699029349	SERVICE PROVIDER	PRESIDIO NETWORKED SOLUTIONS INC.

See attached FY 2016-2017; APPEAL #107994 – PIA review

FORM 471 Ministerial & Clerical Error – FRN# 1699029349. Submitted 7/17/2018

**According to the PIA appeal review statement, “we must determine if your request to add entities as recipients is allowed under the Ministerial and Clerical (M&C) guidelines.**

**Question #1 – Was the entity listed above omitted from the FRN line item’s recipient of services due to M&C error? ANSWER : YES**

Based on the specific verbiage used in this question, Eisenhower Elementary was not listed as a FRN line item's recipient of services – because the entity listed (Eisenhower High School) was the FRN line items was the INCORRECT ENTITY as I described in the appeal letter was **inadvertently entered in error** to the intended entity EISENHOWER ELEM (#84031) listed in the Nickname and Narrative tags. The Presidio contract and FRN detail of equipment and costs also indicated pre-discount amounts matched EISENHOWER ELEM SCH requested amount listed on the FORM 471.

**REFERENCE: DOC #G – EPC USAC APPEAL #107994 – PIA review; 1 page**

**ONLY ONE QUESTION PRESENTED FOR INFORMATION <sup>1</sup>**

**REFERENCE: DOC #H – USAC website guidelines on Ministerial and Clerical (M&C) guidelines; 2 pages**

**According to the FORM 471 Corrections –**

*“The type of errors that applicants may correct on their FORM 471 include – INCORRECT CITATIONS SUCH AS – FORM 471 RECEIPT OF SERVICE ENTITY NUMBERS”. (see as marked)*

See attached FY 2016-2017; USAC Revised Funding Commitment Decision Letter 7/25/2018

This letter denied LAWTON PUBLIC SCHOOLS the ability to make CAT2 entity correction needed for FRN# 1699029349 comments:

“Your total requested Category Two pre-discount funding amount for **BEN 84027** exceeds this entity’s Category Two Budget by: \$1,680.29 This funding request is being denied because you have not authorized sufficient modifications to the Category Two funding requests to bring this BEN within its allowable Category Two budget.”

**REFERENCE: DOC #I – USAC Revised Funding Commitment Decision Letter; 5 pages – wrong BEN# cited – should be #84031 and CAT2 are available for this correction!**

No additional questions or concerns from APPEAL PIA review addressed this issue as to correction to be made.<sup>1</sup>

CAT2 budget information was not cited for additional PIA questions or concerns.(only the M&C question submitted for response)

Machelle McKay, Consultant and LAWTON PUBLIC SCHOOLS was not provided the opportunity make any reduction in funding request to meet the CAT2 budget requirement.

**REFERENCE: DOC #J – CAT2 Budget adjustment worksheet; 1 page**

Our dispute is based on USAC’s decision of Recovery of Improperly Disbursed Funds Decision Letter, USAC missed a couple of key elements that could have prevented LAWTON PUBLIC SCHOOLS from any loss of funding to their school district.

- 1) Both USAC multi-level PIA reviews and APPEAL PIA reviews – missed the fact that Eisenhower High school was entered in error, addressing the correction for Eisenhower Elem School (#84031) did not result in the recipient of services correction requested.
- 2) USAC Revised Decision Letter was based on a decision about the INCORRECT BEN for CAT2 available funding. USAC made funding deduction from the correct BEN #84031 EISENHOWER ELEM SCH and CAT2 funding is available to make this correction!

**REFERENCE: DOC #K –CAT2 funding balance per USAC website for EISENHOWER ELEM SCH #84031**

We request the Recovery of Improperly Disbursed Funds Letter be rescinded.

The requested funding to be reinstated with corrections for Eisenhower Elementary School, as intended recipient of products and services by all evidence documents.

In self-reporting this error, Lawton Public Schools has been transparent in hope to maintain accurate & detailed record keeping and ability to seek reimbursement upon FCC appeal approval.

Page 4	FCC APPEAL 02-6	BEN#	139876
FUNDING YR	2016	ENTITY	LAWTON PUBLIC SCHOOLS
471 #	161016445	SPIN#	143015315
FRN#	1699029349	SERVICE PROVIDER	PRESIDIO NETWORKED SOLUTIONS INC.

If you have any questions or concerns, please contact me at your earliest convenience.

*Machelle McKay*

Machelle McKay  
COLLECT-ED  
E-Rate Consultant

David McDermott  
LAWTON PUBLIC SCHOOL DIST  
Media Operations Director

**CC: LAWTON PUBLIC SCHOOL DIST**



Page 2	FCC APPEAL 02-6	BEN#	139876
FUNDING YR	2016	ENTITY	LAWTON PUBLIC SCHOOLS
471 #	161016445	SPIN#	143015315
FRN#	1699029349	SERVICE PROVIDER	PRESIDIO NETWORKED SOLUTIONS INC.

## SUPPORTING DOCUMENTATION (FORMS AND PREVIOUS CORRESPONDENCE)

DOC#	FORM#	DESCRIPTION	PAGES
A		APPEAL DISPUTE - USAC LETTER – 9/19/2018 Recovery of Improperly Disbursed Funding	3
B		CAT2 Budget reconciliation worksheet	8
C	470# 160005000	FORM 470 & attached Request for Proposal (RFP)	13
D		Presidio Networked Solutions LLC Proposal awarded 2/18/2016 Site location details	30
E	471# 161016445	FORM 471 only FRN# 1699029349; USAC original document is 149 pages – I extracted the specific FRN#1699029349 for Eisenhower Elementary School only	14
F	471# 161016445	FCDL – 12/28/2016 \$ 774,735.05	9
G		ERATE TRANSACTION DOCUMENTS Lawton Public Schools PO # 00170561 Presidio Networks Invoice # 6011117008526 – hardware Presidio Networks Invoice# 6011117030036 - installation Network Asset Log – Eisenhower Elem School (installed)	5
H		EPC USAC APPEAL #107994 FCDL decision for FRN# 1699029349 to correct named entity in line items listed as Ministerial & Clerical Error	15
I		EPC USAC APPEAL #107994 – PIA review	1
J		USAC website guidelines on Ministerial and Clerical (M&C) guidelines	2
K		USAC Revised Funding Commitment Decision Letter ; WRONG decision made by USAC; named the INCORRECT BEN# for CAT2 available funding. THIS SHOULD BE FOR EISENHOWER ELEM SCH (#84031)	5
L		CAT2 Budget adjustment worksheet EISENHOWER ELEM SCH (#84031)	1
M		CAT2 funding balance per USAC website #84031 – EISENHOWER ELEM SCH	2

	FCC APPEAL 02-60	BEN#	139876
FUNDING YR	2016	ENTITY	LAWTON PUBLIC SCHOOLS
471 #	161016445	SPIN#	143015315
FRN#	1699029349	SERVICE PROVIDER	PRESIDIO NETWORKED SOLUTIONS INC.

DOCUMENT#	A
DESCRIPTION:	APPEAL DISPUTE - USAC LETTER – 9/19/2018 Recovery of Improperly Disbursed Funding
# OF PAGES	3





Universal Service  
Administrative Co.

## Recovery of Improperly Disbursed Funds Letter

David McDermott  
LAWTON PUBLIC SCHOOL DIST I 8  
753 NW FORT SILL BLVD  
LAWTON, OK 73502

09/19/2018

Our review of your Schools and Libraries Universal Service Support Program (or E-rate) funding request has determined funds were committed in violation of Federal Communications Commission (FCC) rules. You have 60 days from the date of this letter to appeal the following decision(s). For more detailed information see below.

**Total amount to be recovered:** \$22,062.68

FCC Form 471	FRN	Commitment adjustment	Total amount to be recovered	Explanation(s)	Party to recover from
161016445	1699029349	\$0.00	\$22,062.68	Funds disbursed are greater than the commitment amount	BEN

See Attached Adjustment Report for more information on the specific FRNs and Explanations listed above.

### Recovery of Improperly Disbursed Funds

Our review of your Universal Service Schools and Libraries Support Program (or E-rate) funding request(s) referenced in the Adjustment Report has determined funds were improperly disbursed in violation of Federal Communications Commission (FCC) rules. A copy of that Adjustment Report is also attached to this letter.

FCC rules require the Universal Service Administrative Company (USAC) to recover funding when it is determined that funding was disbursed in violation of the rules. This letter notifies you that USAC will be recovering funding that was improperly disbursed and provides information on how to appeal this decision.

This is NOT a bill. If disbursed funds need to be recovered, USAC will issue a Demand Payment Letter. The debt referenced in the Demand Payment Letter will be due within 30 days of that letter's date. Failure to pay the debt may result in interest, late payment fees, and administrative charges and will invoke the FCC's "Red Light Rule."

### FCC's Red Light Rule

The FCC Red Light Rule requires USAC to dismiss pending FCC Form 471 applications, appeals, and invoices or to net disbursements offsetting the debt if the entity responsible for paying the outstanding debt owed to the FCC has not paid the debt or made satisfactory arrangements to pay the debt within 30 days of the Demand Payment Letter. For information on the Red Light Rule, see

<https://www.fcc.gov/licensing-databases/fees/debt-collection-improvement-act-implementation>.

### To Appeal This Decision

If you wish to contest any part of this letter, you must first file an appeal with USAC to seek review of the decision. Parties that have filed an appeal with USAC and received an adverse decision may, if they choose, appeal USAC's decision to the FCC. Parties seeking a waiver of a codified FCC rule should file a request for waiver directly with the FCC because



USAC cannot waive FCC rules. Your appeal to USAC or waiver request to the FCC must be filed within 60 days of the date of this letter.

All appeals filed with USAC must be filed in EPC by selecting "Appeal" from the menu in the top right hand corner of your landing page and providing the requested information.

Your appeal should include the following information. (Because you file the appeal through your EPC account, the system will automatically fill in some of these components for you).

- 1) Name, address, telephone number, and email address for the contact person for this appeal.
- 2) Indicate specifically that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., Recovery of Improperly Disbursed Funds) and the decision you are appealing:
  - a. Appellant name;
  - b. Applicant name and service provider name, if different from appellant;
  - c. Applicant BEN and Service Provider Identification Number (SPIN);
  - d. FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC;
  - e. "Recovery of Improperly Disbursed Funds," AND the exact text of the decision that you are appealing.
- 3) Identify the problem and the reason for the appeal and explain precisely the relief sought. Please keep your appeal to the point, and provide supporting documentation. Be sure to keep a copy of your entire appeal, including any correspondence and documentation. A copy will automatically be saved for you in EPC. USAC will reply to your appeal submission to confirm receipt.

For more information on submitting an appeal to USAC including step by step instructions on how to file the appeal through EPC, please see "Appeals" in the Schools and Libraries section of the USAC website.

As mentioned, parties seeking a waiver of FCC rules or that have filed an appeal with USAC and received a decision may file a request for waiver or appeal USAC's decision to the FCC. Waiver requests or appeals to the FCC must be made within 60 days of the issuance of USAC's decision and include all of the information referenced above for appeals to USAC.

The FCC recommends filing appeals or waiver requests with the Electronic Comment Filing System (ECFS) to ensure timely filing. Electronic waiver requests or appeals will be considered filed on a business day if they are received at any time before 11:59 PM ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193.

For more information about submitting waiver requests or appeals to the FCC, including options to submit the waiver request or appeal via U.S. mail or hand delivery, visit the FCC's website.

Schools and Libraries Division





## Adjustment Report

FCC Form 471 Application Number:	161016445
Funding Request Number:	1699029349
Commitment Adjustment:	\$0.00
Total Amount to Be Recovered:	\$22,062.68
Explanation(s):	Funds disbursed are greater than the commitment amount
Party to Recover From:	BEN
Funding Year:	2016
Billed Entity Number:	139876
Services Ordered:	Internal Connections
Service Provider Name:	Presidio Networked Solutions LLC
SPIN:	143015315
Original Funding Commitment:	\$0.00
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$22,062.68

## Funding Commitment Adjustment Explanation:

During USACs review, it was determined that funds were improperly disbursed for this funding request. On the original FCC Form 471, the applicant was approved at \$22,062.68 for FRN 1699029349. Based on a/n Appeals Review, the funding amount was reduced to \$0. As a result, the correct commitment amount for the FRN is \$0, which is less than the amount that was disbursed. Therefore, USAC will seek recovery of \$22,062.68 improperly disbursed funds from the applicant.



	FCC APPEAL 02-60	BEN#	139876
FUNDING YR	2016	ENTITY	LAWTON PUBLIC SCHOOLS
471 #	161016445	SPIN#	143015315
FRN#	1699029349	SERVICE PROVIDER	PRESIDIO NETWORKED SOLUTIONS INC.

DOCUMENT#	B
DESCRIPTION:	CAT2 Budget reconciliation worksheet
# OF PAGES	8



## ELEMENTARY SCHOOLS

[illegible]



## ELEMENTARY SCHOOLS

Discovered error

ELEMENTARY SCHOOLS

ENTITY #	84028	84030	84037	84001	84034	84018	84026	84031	16075491	84014	84020	83995	84038	84036	84019	84005	84043	84007	84025
ENTITY	ADAMS ELEM	ALMOR WEST	BEGINNINGS	CARRIAGE HILLS ELEM	CLEVELAND ELEM	CROSBY PARK ELEM	EDISON ELEM	ESSENHOWER ELEM	FREEDOM ELEM	HUGH BISH ELEM	LEARNING TREE	LINCOLN ELEM	PAT HENRY ELEM	PIONEER PARK ELEM	RIDGECREST ELEM	SULLIVAN VILLAGE ELEM	WASHINGTON ELEM	WHITTER ELEM	WOODLAND ELEM
STUDENT COUNT (AS OF 2017)	259	288	176	351	332	296	471	308	1180	339	166	379	540	400	546	466	229	301	499
Pre-discount budget (\$150/ PER STUDENT)	\$ 38,850.00	\$ 43,200.00	\$ 26,400.00	\$ 52,650.00	\$ 49,800.00	\$ 44,400.00	\$ 70,650.00	\$ 46,200.00	\$ 177,000.00	\$ 50,850.00	\$ 24,900.00	\$ 56,850.00	\$ 81,000.00	\$ 60,000.00	\$ 81,900.00	\$ 69,900.00	\$ 34,350.00	\$ 45,150.00	\$ 74,850.00
FUNDING USED																			
4718 FY 2017																			
171004416																			
FRNF 1799007509	\$ 1,735.44	\$ 2,603.16		\$ 1,735.44			\$ 1,735.44	\$ 1,735.44				\$ 1,735.44			\$ 1,735.44	\$ 2,603.16		\$ 1,735.44	\$ 1,735.44
TOTAL USED	\$ 1,735.44	\$ 2,603.16	\$ -	\$ 1,735.44	\$ -	\$ -	\$ 1,735.44	\$ 1,735.44	\$ -	\$ -	\$ -	\$ 1,735.44	\$ -	\$ -	\$ 1,735.44	\$ 2,603.16	\$ -	\$ 1,735.44	\$ 1,735.44
NET FUNDING FOR 2018	\$ 14,511.75	\$ 2,407.48	\$ -4,717.22	\$ 8,160.38	\$ 15,157.12	\$ 150.06	\$ 35,145.90	\$ 29,443.18	\$ 15,077.22	\$ 7,009.92	\$ (5,099.96)	\$ 12,800.39	\$ 29,944.60	\$ 5,976.98	\$ 40,724.92	\$ 17,444.54	\$ 6,474.94	\$ 8,913.59	\$ 30,310.80

FY 2018 NO REQUEST FILED FOR FY 2018 FOR CAT 2

STUDENT COUNT (AS OF 2018)	236	320	176	340	333	315	472	312	1109	306	183	355	545	388	503	464	212	310	487
Pre-discount budget (\$150/ PER STUDENT)	\$ 35,400.00	\$ 48,000.00	\$ 26,400.00	\$ 51,000.00	\$ 49,950.00	\$ 47,250.00	\$ 70,800.00	\$ 46,800.00	\$ 166,350.00	\$ 45,900.00	\$ 27,450.00	\$ 53,250.00	\$ 81,750.00	\$ 58,200.00	\$ 75,450.00	\$ 69,600.00	\$ 33,300.00	\$ 46,500.00	\$ 73,050.00
amount used to date	\$ 24,338.25	\$ 40,792.52	\$ 21,682.78	\$ 44,489.62	\$ 34,642.88	\$ 44,249.94	\$ 35,504.10	\$ 16,756.86	\$ 161,922.78	\$ 43,840.08	\$ 29,999.96	\$ 43,949.61	\$ 51,055.40	\$ 54,823.02	\$ 41,175.08	\$ 52,455.46	\$ 27,875.06	\$ 35,226.41	\$ 54,539.20
ESTIMATED FUNDING FOR 2019*	\$ 11,061.75	\$ 7,207.48	\$ -	\$ 6,510.38	\$ 15,307.12	\$ 3,000.06	\$ 35,295.90	\$ 80,043.14	\$ 4,827.22	\$ 2,059.82	\$ -	\$ 9,300.39	\$ 30,694.60	\$ 3,276.98	\$ 34,274.92	\$ 17,444.54	\$ 5,424.94	\$ 11,279.59	\$ 18,510.80
*not including changes in enrollment counts or rate inflation factor																			
USAC AMOUNT	\$ 12,532.49	\$ 9,201.70	\$ -	\$ 8,629.24	\$ 17,382.35	\$ 4,963.12	\$ 38,237.38	\$ 31,987.51	\$ 11,338.47	\$ 3,966.91	\$ -	\$ 11,512.73	\$ 34,093.01	\$ 5,694.98	\$ 37,109.59	\$ 20,036.17	\$ 6,808.43	\$ 13,205.49	\$ 21,545.76





## ELEMENTARY SCHC

[illegible]

NET FUNDING FOR 2016

## ELEMENTARY SCHC

ENTITY #	84004	84011	84012	84021	84041
ENTITY	PARK LANE ELEM	SHERIDAN ROAD ELEM	BROCKLAND ELEM	SWINNEY ELEM	WILSON ELEM
STUDENT COUNT					
OF 2016					
Pre-discount Budget (\$150/ PER STUDENT)					
					\$ 1,179,900.00
<b>FUNDING USED</b>					
<b>471#</b>					
<b>161016445</b>					
FRNH 1699029338					\$ 18,010.44
FRNH 1699029341					\$ 17,586.12
FRNH 1699029342					\$ 11,191.44
FRNH 1699029343					\$ 18,785.31
FRNH 1699029346					\$ 20,223.75
FRNH 1699029347					\$ 29,176.29
FRNH 1699029349					\$ -
FRNH 1699029350					\$ 100,844.91
FRNH 1699029351					\$ 16,438.11
FRNH 1699029353					\$ 9,570.06
FRNH 1699029364					\$ 30,050.52
FRNH 1699029401					\$ 37,621.80
FRNH 1699029403					\$ 46,463.04
FRNH 1699029405					\$ 27,578.37
FRNH 1699029406					\$ 34,847.28
FRNH 1699029407					\$ 29,201.88
FRNH 1699029408					\$ 23,282.70
FRNH 1699029409					\$ 12,840.54
<b>TOTAL USED</b>					\$ 26,777.56
					\$ 2,294,474.64
<b>NET FUNDING FOR 2016</b>					



ELEMENTARY SCHC

ENTITY #	84004	84011	84012	84021	84041
ENTITY	PARK LANE ELEM	SHERIDAN ROAD ELEM	BROCKLAND ELEM	SWINNEY ELEM	WILSON ELEM
STUDENT COUNT	(AS				
OF 2017					
Pre-discount budget (\$150/ PER STUDENT)					
					\$ 1,128,900.00
FUNDING USED					
4718 171004616					
FY 2017 FIRM 1799007509					\$ 19,089.84
TOTAL USED					\$ 19,089.84
NET FUNDING FOR 2018					

FY 2018 NO REQUEST FILED

STUDENT COUNT	(AS				
OF 2018)					
Pre-discount budget (\$150/ PER STUDENT)					\$ 1,106,400.00
amount used to date					
ESTIMATED FUNDING FOR 2018*					\$ 244,813.73
*not including changes in enrollment					
USAC AMOUNT					\$ 288,243.33

## HIGH SCHS

NET FUNDING FOR 2016

## 150/ PER STUDENT)

**NET FUNDING FOR 2016**

discovered error



STUDENT COUNT (AS OF 2016)	747	872	801	724	1168	1624	1059	
Pre-discount budget (\$150/ PER STUDENT)	\$ 112,050.00	\$ 130,800.00	\$ 120,150.00	\$ 108,600.00	\$ 175,200.00	\$ 243,600.00	\$ 158,850.00	\$ 1,049,250.00
471# 171004416 FY 2017								
FRNH 1799007509								\$ 59,544.55
TOTAL USED	\$ -	\$ -	\$ -	\$ -	\$ 16,093.97	\$ 26,080.04	\$ 17,370.54	\$ 59,544.55
NET FUNDING FOR 2018	\$ 25,546.58	\$ 24,270.06	\$ 37,745.07	\$ 45,027.52	\$ 24,146.08	\$ 73,267.90	\$ 11,302.21	\$ -

FY 2018 NO REQUEST FILED FOR FY 2018 FOR CAT 2

#### MIDDLE SCHS

ENTITY #	83997	84013	84040	84024	84027	84042	84000	
CENTRAL MIDDLE	EISENHOWER MIDDLE	MACARTHUR MIDDLE	TOMLINSON MIDDLE	EISENHOWER HIGH SCH	LAWTON HIGH SCH	MACARTHUR HIGH SCH		
783	886	735	651	1065	1467	926		TOTAL
Pre-discount budget (\$150/ PER STUDENT)	\$ 117,450.00	\$ 132,900.00	\$ 110,250.00	\$ 97,650.00	\$ 159,750.00	\$ 220,050.00	\$ 138,900.00	
amount used to date	\$ 86,503.42	\$ 106,529.94	\$ 82,404.93	\$ 63,572.48	\$ 178,632.29	\$ 170,332.10	\$ 147,547.79	\$ 835,522.95
ESTIMATED FUNDING FOR 2019*	\$ 30,946.58	\$ 26,370.06	\$ 27,845.07	\$ 34,077.52	\$ (18,882.29)	\$ 49,717.90	\$ -	\$ 150,074.84
*not including changes in enrollment counts or Erate inflation factor								
USAC ESTIMATE	\$ 35,826.00	\$ 31,891.57	\$ 32,425.55	\$ 38,134.52	\$ 15,333.11	\$ 58,860.17	\$ -	\$ 212,470.92

USAC ERROR



	FCC APPEAL 02-60	BEN#	139876
FUNDING YR	2016	ENTITY	LAWTON PUBLIC SCHOOLS
471 #	161016445	SPIN#	143015315
FRN#	1699029349	SERVICE PROVIDER	PRESIDIO NETWORKED SOLUTIONS INC.

DOCUMENT#	C
DESCRIPTION:	FORM 470# 16000500 FORM 470 & attached Request for Proposal (RFP)
# OF PAGES	13





## FCC Form 470 – Funding Year 2016

Form 470 Application Number: 160005000  
470-2016-139876-Lawton OK

### Billed Entity

LAWTON PUBLIC SCHOOL DIST I 8  
753 NW FORT SILL BLVD  
LAWTON, COMANCHE, OK 73502  
580-585-6446

### Contact Information

David McDermott  
dmcdermott@lawtonps.org  
580-713-4207 ext.2180

**Billed Entity Number:** 139876

**FCC Registration Number:** 0001689850

### Application Type

**Applicant Type:** School District  
**Recipients of Services:**

**Number of Eligible Entities:** 31

### Consulting Firms

Name	Consultant Registration Number	Phone Number	Email
COLLECT-ED LLC	16062522	405-830-2200	collect-ed@hotmail.com

### Consultants

Name	Phone Number	Email
Machelle McKay	405-830-2200	collect-ed@hotmail.com

### RFPs

Id	Name
7230	2016-01-11 EMAIL - NOTICE TO ALL BIDDERS - electrical outage website post
1987	CAT 2 - RFP Internal Connections 16-17 v2
1988	CAT 1 - RFP Internet Access 16-17
1989	2016 RFP CAT 1 worksheet - LAWTON
1990	CAT 2 - RFP Internal Connections 16-17
2019	2016 RFP CAT 2 worksheet - LAWTON

### Category One Service Requests

Service Type	Function	Other	Minimum Capacity	Maximum Capacity	Entities	Quantity	Unit	Installation and Initial Configuration?	Maintenance and Technical Support?	Associated RFPs
Internet Access and/or Telecommunications	Voice Service (Analog, Digital, Interconnected VOIP, etc)				31	5000	Users	Yes	Yes	7230
Internet Access and/or Telecommunications	Voice Service (Analog, Digital, Interconnected VOIP, etc)				31	5000	Users	Yes	Yes	7230
Internet Access and/or Telecommunications	Internet Access and Transport Bundled		2 Gbps	10 Gbps	32	1	Circuits	Yes	Yes	1987, 1988, 7230

### Description of Other Functions

Id	Name

**Narrative**

ALL BIDS DUE BY JAN 15, 2016

Requested products and services may be contingent on Erate funding approval and / or School Board approval.

VOICE - Local Services - approx 100 POTs lines - district wide (servicing 31 eligible entity locations) servicing a staff of approx 5000 and 31 entities

VOICE - Long Distance - approx 100 POTs lines - district wide (servicing 31 eligible entity locations) servicing a staff of approx 5000 and 31 entities

INTERNET ACCESS - see [www.lpsmedia.org](http://www.lpsmedia.org) for RFP and QA

Cameron University entity is ONLY COUNTED as an entity for the DMARC location not as part of the school district.

**Installment Payment Plan**

Range of Years: 1 - 4 Years

Payment Type: Annual

**Category Two Service Requests**

Service Type	Function	Manufacturer	Other	Entities	Quantity	Unit	Installation and Initial Configuration?	Associated RFPs
Internal Connections	WAP	Cisco Systems or equivalent			580	Each	Yes	1989, 1990, 2019, 7230
Internal Connections	Switches	Cisco Systems or equivalent			81	Each	Yes	1989, 1990, 2019, 7230
Internal Connections	Switches	Cisco Systems or equivalent			38	Each	Yes	1989, 1990, 2019, 7230
Internal Connections	Cabling	No Preference		26	96900	Feet	Yes	1989, 1990, 2019, 7230

**Description of Other Manufacturers**

Id	Name
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**Narrative**

ALL BIDS DUE BY JAN 15, 2016

Requested products and services may be contingent on Erate funding approval and / or School Board approval.

INTERNAL CONNECTIONS - see [www.lpsmedia.org](http://www.lpsmedia.org) for RFP and QA

NOTE: Cabling is may be a long/short on estimate; it is listed as number of drops on RFP not measured in feet.

**Technical Contact**

Zeldon Rice

Information Technology Director

580-713-4207 ext.2100

zrice@lawtonps.org

**State and Local Procurement Restrictions**

Reference: Oklahoma Dept. of Education website: SECTION 1356. Public Competitive Bidding Act of 1974 [http://www.ok.gov/sde/sites/ok.gov.sde/files/documents/files/2014\\_OSDE\\_Law\\_Book.pdf](http://www.ok.gov/sde/sites/ok.gov.sde/files/documents/files/2014_OSDE_Law_Book.pdf)

Requested products and services may be contingent on Erate funding approval and / or School Board approval.

**Recipients of Service**

Billed Entity Number	Billed Entity Name
139876	LAWTON PUBLIC SCHOOL DIST I 8

**Certifications**

I certify that the applicant includes:



I certify that the applicant includes 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.

#### Other Certifications

I certify that this FCC Form 470 and any applicable RFP will be available for review by potential bidders 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 bid selected will be for the most cost-effective service or equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology goals.

I certify that I have reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that I have complied with them. I acknowledge that persons willfully making false statements on this form may 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.

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 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 certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the form for, receipt of, and delivery of services receiving schools and libraries discounts. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. 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 form have not received anything of value or a promise of anything of value, 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 acknowledge that support under this support mechanism is conditional upon the school(s) and/or library(ies) I represent securing 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 I have considered what financial resources should be available to cover these costs. I certify that I am authorized to procure eligible services for the eligible entity(ies). I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this form, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

#### Authorized Person

David McDermott  
LAWTON PUBLIC SCHOOL DIST I 8  
753 NW FORT SILL BLVD  
LAWTON, COMANCHE, OK 73502  
580-713-4207 ext.2180  
dmcdermott@lawtonps.org

#### Certified Timestamp

11/19/2015 04:26 PM CST

## LAWTON PUBLIC SCHOOLS

### E-RATE FORM 470 ATTACHMENT INTERNAL CONNECTIONS DETAILS BY SCHOOL SITE

#### BID REQUIREMENTS:

- ✓ VOLUNTARY WALK-THOROUGH – December 8, 2015 @ 8 AM
- ✓ INCLEMENT WEATHER ALTERNATE WALK-THOROUGH – December 15, 2015 @ 8 AM
- ✓ BIDS DUE NO LATER THAN – January 16, 2016 @ 4PM
- ✓ DUE TO E-RATE DISCOUNT TIERS, BIDS **MUST BE SUBMITTED BY SCHOOL LOCATION**
- ✓ ALL BIDS MUST INCLUDE INSTALLATION AND CONFIGURATION BY SCHOOL LOCATION,
- ✓ MUST BE OPERATIONAL AND COMPATIBLE WITH CISCO NETWORK ENVIRONMENT
- ✓ REQUESTED PRODUCTS & SERVICES MAY BE CONTINGENT OF SCHOOL BOARD APPROVAL AND E-RATE FUNDING APPROVAL.

FOR ADDITIONAL INFORMATION, PLEASE CONTACT:

Zeldon Rice, Informational Technology Director - [zrice@lawtonps.org](mailto:zrice@lawtonps.org)

#### **WIRELESS ACCESS POINTS: with 1, 3, & 5 year Enterprise Licenses for pricing consideration (and Cabling)**

Minimum specs and quantities - Access Point-One 802.11b/g/n, one 802.11ac/a/n radio, and one dedicated for dual-band WIPS & spectrum analysis, 3-stream 802.11ac and 802.11n, up to 1.75 Gbps , 802.3at/802.3af PoE (Cloud Managed) (including ceiling mounts): Cabling minimum – CAT6 1 drop per location as listed.

#### LOCATION / MINIMUM QTY:

##### Elem Schools:

Adams (9) ; Almor West (10) ; Beginnings (7); Carriage Hills (11); Cleveland (14) ; Crosby Park (15); Edison (15); Eisenhower (16); Freedom (54); Hugh Bish (11); Learning Tree Academy (11) ; Lincoln (24); Pat Henry (24) ; Pioneer Park (16); Ridgecrest (18) ; Sullivan Village (16) ; Washington (14); Whittier (8); Woodland Hills (17)

##### Middle Schools:

Central Middle (32); Eisenhower (35); MacArthur (23); Tomlinson (30)

##### High Schools:

Eisenhower (56); Lawton (47); MacArthur (47)



**NETWORK SWITCHES – 48 PORT: with 1, 3, & 5 year Enterprise Licenses for pricing consideration**

Minimum specs and quantities - 48 port gigabit Ethernet - Switch - cloud Managed - 4 × SFP for 1G uplink, non-shared - rack-mountable - 370 W PoE / PoE+ (including AC Power supply and power cables):

LOCATION / MINIMUM QTY:

Elem Schools:

Adams (2) ; Almor West (2); Beginnings (1); Carriage Hills (2); Cleveland (3) ; Crosby Park (3); Edison (4) ; Eisenhower (3); Freedom (10); Learning Tree Academy (2) ; Lincoln (2); Pat Henry (4); Pioneer Park (3); Ridgecrest (3) ; Sullivan Village (3) ; Woodland Hills (3)

Middle Schools:

Central Middle (3); Eisenhower (4); MacArthur (3); Tomlinson (4)

High Schools:

Eisenhower (4); Lawton (7); MacArthur (6)

**NETWORK SWITCHES – 24 PORT: with 1, 3, & 5 year Enterprise Licenses for pricing consideration**

Minimum specs and quantities - 24 port gigabit Ethernet, 4 × SFP for 1G uplink, 370 W PoE / PoE+- rack-mountable - Cloud Managed (including AC Power supply and power cables):

LOCATION / MINIMUM QTY:

Elem Schools:

Adams (1); Cleveland (3) ; Freedom (5); Hugh Bish (2); Lincoln (2) ; Pat Henry (4); Ridgecrest (3) ; Sullivan Village (1) ; Washington (4); Whittier (2);

Middle Schools:

Central Middle (2); MacArthur (2);

High Schools:

Eisenhower (2) ; Lawton (3); MacArthur (2)





# LAWTON PUBLIC SCHOOL RFP - COST FORM

**INTERNAL CONNECTIONS**  
**Deadline: JAN 16, 2016 @ 4pm**

In order to insure that an equitable comparison can be made between vendor responses Lawton Public Schools will be using the below pricing matrix. Vendor must provide written details including part number, description of item, unit price and extended price by each location.

**Please note: Winning bids may be selected by product, project and/or total bid.**

## TOTAL BID WORKSHEET

EQUIPMENT / PROJECT	WIRELESS ACCESS POINTS & LICENSING	CABLE DROPS (for wireless access points)	NETWORK SWITCHES - 48 PORT (with AC power supply and power cables)	NETWORK SWITCHES - 24 PORT (with AC power supply and power cables)	TOTAL Installation & Configuration (see additional worksheet)	MISCELLANEOUS (fees, taxes, shipping/freight, etc)	COST ALLOCATION FOR ERATE APPLICATIONS	
							<u>Erate Eligible Charges</u>	<u>Not Eligible Charges</u>
<b>MIDDLE SCHOOLS</b>								
Central Middle								
Eisenhower								
MacArthur								
Tomlinson								
<b>HIGH SCHOOLS</b>								
Eisenhower								
Lawton								
MacArthur								

[illegible]



**INTERNAL CONNECTIONS**  
**Deadline: JAN 16, 2016 @ 4pm**

In order to insure that an equitable comparison can be made between vendor responses Lawton Public Schools will be using the below pricing matrix. Vendor must provide written details including part number, description of item, unit price and extended price by each location.

**Please note: Winning bids may be selected by product, project and/or total bid.**

**BY PROJECT - wireless access points**

[illegible]

LAWTON PUBLIC SCHOOL  
RFP - COST FORM

INTERNAL CONNECTIONS  
Deadline: JAN 16, 2016 @ 4pm

In order to insure that an equitable comparison can be made between vendor responses Lawton Public Schools will be using the below pricing matrix. Vendor must provide written details including part number, description of item, unit price and extended price by each location.

Please note: Winning bids may be selected by product, project and/or total bid.

BY PROJECT - Network Switches - 48 port

EQUIPMENT / PROJECT	APPROX QTY	NETWORK SWITCHES - 48 PORT	AC Power Supply & Power Cable	Modules (as needed)	Miscellaneous patch cables (as needed)	TOTAL Installation & Configuration (see additional worksheet)	MISCELLANEOUS (fees, taxes, shipping/freight, etc)	COST ALLOCATION FOR ERATE APPLICATIONS	
								Erata Eligible Charges	Not Eligible Charges
MANUFACTURE PART NUMBER(S)	81								
COST PER UNIT									
<b>ELEMENTARY SCHOOLS</b>									
Adams	2								
Almor West	2								
Beginnings	1								
Carriage Hills	2								
Cleveland	3								
Crosby Park	3								
Edison	4								
Eisenhower	3								
Freedom	10								
Hugh Bish									
Learning Tree Academy	2								
Lincoln	2								
Pat Henry	4								
Pioneer Park	3								
Ridgecrest	3								
Sullivan Village	3								
Washington									
Whittier									
Woodlands	3								



[illegible]

[illegible]



LAWTON PUBLIC SCHOOL  
RFP - COST FORM

INTERNAL CONNECTIONS

Deadline: JAN 16, 2016 @ 4pm

In order to insure that an equitable comparison can be made between vendor responses Lawton Public Schools will be using the below pricing matrix. Vendor must provide written details including part number, description of item, unit price and extended price by each location.

**Please note: Winning bids may be selected by product, project and/or total bid.**

**BY PROJECT - Network Switches - 24 port**

BY PROJECT - Network Switches - 24 port

COST ALLOCATION FOR ERATE APPLICATIONS										
EQUIPMENT / PROJECT	APPROX QTY	NETWORK SWITCHES - 24 PORT	AC Power Supply & Power Cable	Modules (as needed)	Miscellaneous patch cables (as needed)	TOTAL Installation & Configuration (see additional worksheet)	MISCELLANEOUS (fees, taxes, shipping/frieght, etc)	TOTAL COST	Erate Eligible Charges	Not Eligible Charges
MANUFACTURE PART NUMBER(s)	38									
COST PER UNIT										
MIDDLE SCHOOLS										
Central Middle	2									
Eisenhower										
MacArthur	2									
Tomlinson										
HIGH SCHOOLS										
Eisenhower	2									
Lawton	3									
MacArthur	2									