

Appeal

CC Docket# 02-6

Applicant Name: **St Michael School**

Entity Number: **27239**

Funding Year: 2019-20

CONTACT INFORMATION

Contact Person: John Hughes
Contact Information:
Email: john@cas-erate.com
Phone: 910-333-6870
Fax: 910-653-1669
Address: 4438 Glenscape 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

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