

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Request for Review and/or Waiver by)	Application Nos. 926030,
Missouri Research and Education Network)	926085, 925888, 926124,
of a Funding Decision by the)	972959, 973440, 973727,
Universal Service Administrative Company)	and 973753 ¹

**REQUEST FOR REVIEW AND/OR WAIVER BY THE
MISSOURI RESEARCH AND EDUCATION NETWORK
OF A FUNDING DECISION BY THE
UNIVERSAL SERVICE ADMINISTRATIVE COMPANY**

Pursuant to sections 54.719 and 54.722 of the Commission's rules,² the Missouri Research and Education Network³ (MOREnet) hereby respectfully requests a review of a Universal Service Administrative Company (USAC) decision to rescind and recover Schools and Libraries Universal Service (E-rate) funding for Funding Years 2013 and 2014.

USAC rescinded MOREnet's funding because it determined that MOREnet incorrectly calculated the discount for its consortium applications.⁴ To the contrary, MOREnet scrupulously followed FCC rules, FCC orders, and the instructions on the FCC Form 471 to determine the discounts for Internet access services on its applications. Furthermore, the methodology

¹ See Exhibit 1 for a list of all the relevant FRNs for funding year 2013; Exhibit 2 for funding year 2014.

² 47 C.F.R. § 54.719(b), (c); 47 C.F.R. § 54.722(a).

³ Billed Entity Number 152265.

⁴ See Exhibit 3, FY 2014 Notification of Commitment Adjustment Letter dated June 30, 2017. This is just one example of the many commitment adjustments received by MOREnet. USAC's reasoning for reducing funding is the same for each FRN.

MOREnet used for FYs 2013 and 2014 is the exact same methodology USAC's E-rate Productivity Center (EPC) uses today to calculate the discount rate for consortia applications. There was no intervening rule change that would have caused the methodology used by MOREnet to violate the rules before FY 2015, but be in compliance with the rules now.

For these reasons, MOREnet urges the Bureau to reverse USAC's decision to recover funding from MOREnet for funding years 2013 and 2014. In the alternative, MOREnet requests that the Bureau grant a waiver of the Commission's rules and direct USAC to cease its recovery of nearly \$400,000.

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I. BACKGROUND

The Missouri Research and Education Network (MOREnet) provides high-capacity Internet connectivity, access to Internet2, technical services, resources and support, as well as technical training to Missouri's public sector entities, including K-12 schools and public libraries.⁵ Established in 1991, MOREnet operates as a unit within the University of Missouri System. The University of Missouri system operates as subdivision of the State of Missouri and is subject to the state's procurements laws and regulations.

The MOREnet consortium consists of nearly 600 E-rate eligible schools and libraries across Missouri. MOREnet submits Forms 470 and issues requests for proposals (RFPs) on behalf of its member entities. MOREnet also files multiple applications (Forms 471) for its members each year. MOREnet has participated in the E-rate program since the program's inception in 1998.

For funding years 2013 and 2014, MOREnet sought bids for Internet access services. It then applied for funding for its members. MOREnet typically groups its entities with other entities that have similar discount rates to create between three to five applications, each of which has a different consortium application discount. For example, in FY 2014, MOREnet's Form 471 # 973727 included mostly entities with 70 and 80 percent discount rates.⁶

On March 28, 2017, following Payment Quality Assurance findings, MOREnet received several information requests stating that USAC planned to rescind some commitments associated with MOREnet's FY 2013 and 2014 applications. Chris Schneider, Missouri's state E-rate

⁵ See <https://www.more.net/content/about-us>.

⁶ See Exhibit 4, FY 2014 spreadsheet showing USAC-disputed FRNs. See also Exhibit 5, FY 2013 spreadsheet showing USAC-disputed FRNs. Not all of the FRNs for each application are included; only those for which USAC adjusted the commitment.

coordinator, then emailed Catriona Ayer, then Senior Director, Schools and Libraries Division of USAC, asking her to explain the finding that MOREnet had not correctly calculated its application discounts. Ms. Ayer responded with the following email to Mr. Schneider:⁷

Thank you for your email. Unfortunately, you appear to have an incorrect understanding of how consortia were expected to be filed [*sic*]. Like all other FRNs, the consortia FRNs should only ever have included the entities that are receiving the services. The only time that the entire consortium would be included in an FRN would be when the service in the FRN was shared by all members (possibly a backbone). If there was a specific circuit that delivered service to a specific BEN, then only the BEN should have been included in the FRN for discount calculation purposes.

The same guidance continues to hold true in 2017. If the application only has service to some members, then the consortium application should only contain those consortia members. This is how different consortia applications can get different consortia discount rates in the same funding year, and when filed by the same consortium leader. Since 2015, all FRNs on a consortium app get the same discount rate, but the discount reflects only those BENs that receive service on that application.

Mr. Schneider responded to the USAC inquiry.⁸ In addition to disputing USAC's methodology, he included corrections to USAC's calculations using the district discount rates for the applicable funding years, instead of the district discount rates from FY 2016 that USAC apparently used.⁹ Beginning on June 27, 2017, MOREnet received the first of numerous commitment adjustment letters.¹⁰ MOREnet appealed USAC's COMADs on August 24, 2017,

⁷ See Exhibit 6, Email from Catriona Ayer, Senior Director, Schools and Libraries Division, USAC, to Chris Schneider, MOREnet, dated March 28, 2017.

⁸ See Exhibit 7, Response from Chris Schneider, MOREnet, to USAC.

⁹ See Exhibits 1 and 2. In some instances, USAC also used the discount rate for a particular building location instead of the discount for the relevant school district. See, for example, Exhibit 8. MOREnet did not calculate the amount of this error for each application but can do so if required by the Commission. The revised amounts on Exhibits 1 and 2 do not include this calculation so those numbers would be revised further downward to account for this error.

¹⁰ See Exhibit 3.

and USAC denied MOREnet's appeal on January 22, 2018.¹¹ In the appeal denial, USAC again noted that "[f]or FY2014/FY2013, only the entities receiving service for each funding request can be used to determine the FRN specific discount."¹² Appeals to the Commission are due within 60 days.¹³ As such, MOREnet's appeal is timely filed.

II. MORENET'S CALCULATION METHODOLOGY IS CONSISTENT WITH COMMISSION RULES AND FORM 471 INSTRUCTIONS, AND IT IS HOW USAC CALCULATES CONSORTIA DISCOUNT RATES

USAC's rationale for seeking to recover funding for 2013 and 2014 is both factually incorrect and inconsistent with Commission rules and the FCC Form 471 instructions. The method MOREnet uses to calculate its consortium application discount rates is consistent with Commission rules and with Form 471 instructions. Notably, USAC currently calculates consortium discounts using the methodology used by MOREnet for these applications. As such, USAC should not be able to seek recovery of funding based on its interpretation without having first given applicants clear guidance, especially given that USAC approved MOREnet's funding requests in FYs 2013 and 2014 without ever identifying its discount calculation methodology as an issue.

a. MOREnet's Calculation Methodology Was Consistent with FCC Rules and Orders.

MOREnet's discount calculation complies fully with the Commission's rules and orders. The Commission's rules allow E-rate eligible schools and libraries to form consortia to seek bids

¹¹ See Exhibit 9, USAC's denial of MOREnet's appeal.

¹² See Exhibit 9, USAC's denial of MOREnet's appeal. USAC also included a paragraph that discusses how each individual entity's discount is based on poverty and rurality. We could not discern any additional rule violation that USAC was alleging.

¹³ 47 C.F.R. §§ 54.719(a), 54.720(b).

for services and to apply for E-rate funding.¹⁴ The Commission has directed consortia to use a simple average of its member entities' discount rates when applying for funding for services that are shared by two or more of their schools, libraries or consortia members.¹⁵ The Commission has directed all that consortium leaders filing applications ensure that an eligible school or library shall receive a proportionate share of the shared services for which the support is sought.¹⁶

In the further notice of proposed rulemaking (FNPRM) accompanying the Commission's *First Modernization Order*, the Commission sought comment on revising the methodology for calculating consortia discount rates.¹⁷ In the FNPRM, the Commission described the current rules for consortia:

Under the current rules, a consortium lead calculates the consortium discount by taking a simple average of the discount rates of all of the consortium members. The Commission has said that consortium leads are expected to adjust the

¹⁴ See 47 C.F.R. § 54.501(c) (2011) (“(c) *Consortia*. (1) For purposes of seeking competitive bids for supported services, schools and libraries eligible for support under this subpart may form consortia with other eligible schools and libraries, with health care providers eligible under subpart G, and with public sector (governmental) entities, including, but not limited to, state colleges and state universities, state educational broadcasters, counties, and municipalities, when ordering telecommunications and other supported services under this subpart.”). In 2015, the Commission revised the rule, primarily to clarify that consortia could separately seek bids and submit requests for funding. See 47 C.F.R. § 54.500 (2015) (“*Consortium*. A “consortium” is any local, statewide, regional, or interstate cooperative association of schools and/or libraries eligible for E-rate support that seeks competitive bids for eligible services or funding for eligible services on behalf of some or all of its members. A consortium may also include health care providers eligible under subpart G of this part, and public sector (governmental) entities, including, but not limited to, state colleges and state universities, state educational broadcasters, counties, and municipalities, although such entities are not eligible for support. Eligible schools and libraries may not join consortia with ineligible private sector members unless the pre-discount prices of any services that such consortium receives are generally tariffed rates.”).

¹⁵ 47 C.F.R. § 54.505(b)(4).

¹⁶ *Id.*

¹⁷ *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Report and Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870, ¶¶ 286-291 (2014) (*First Modernization Order* or *Modernization Order FNPRM*).

discount rate received by each member to more closely reflect that member's individual discount rate.¹⁸

Among other proposals, the Commission sought comment on whether it should require consortium leads to submit applications for E-rate support that would ensure that each consortium member would receive the exact discount rate it would receive if it applied on its own.¹⁹ To do this, the Commission noted that the consortium lead would create separate funding requests in an application for each group of consortium members who share the same discount rate.²⁰ After seeking comment on the changes noted above, however, the Commission declined to change the discount calculation methodology for consortia.²¹

As required by the rules, MOREnet arrived at its discount calculation for each application by calculating a simple average of all of the consortium members (schools, school districts and libraries) represented on a specific application. It did not include entities that were members of the consortium but that were not represented on that particular application. On each application, there may be hundreds of separate funding requests, depending on the number of vendors and the contracts with each of those vendors.

For example, application number 973727 contained 67 funding requests (FRNs). Those funding requests included 471 recipients of service.²² MOREnet took the simple average of all

¹⁸ *Id.* at ¶ 286.

¹⁹ *Id.* at ¶ 290.

²⁰ *Id.*

²¹ See *First Modernization Order* at ¶ 221 and *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, *Second Report and Order and Order on Reconsideration*, 29 FCC Rcd 15538 (2014) (*Second Modernization Order*). In the *First Modernization Order*, the Commission revised its rules to require each school district to calculate and use a single district-wide discount rate, rather than calculating and using building-by-building discount rates. *First Modernization Order* at ¶ 210.

²² See Exhibit 10, List of all FY2014 recipients of service on FCC Form 471 # 973727.

of the recipients of Internet access service listed on that particular application, which calculated to an 80 percent discount rate for the application.

To satisfy the Commission’s directive to try to ensure consortia members receive a discount rate close to what they would otherwise be entitled to, as described above, MOREnet attempts to group its member entities into “bands” or ranges of discounts so that the higher-discount schools and libraries are on applications that try to ensure its member entities receive close to the discount they would have received if they applied on their own. As a member-driven consortium, MOREnet does its best to keep all of its members “whole,” that is, not to lose any funding due to their participation in the consortium – consistent with the Commission’s stated policy goals.

MOREnet has therefore complied with the rules and orders adopted by the Commission when calculating its application discount rates.

b. MOREnet’s Calculation Is Consistent with FCC Form 471 Instructions

In addition to complying with Commission rules and orders, MOREnet’s discount calculation methodology was also completely consistent with the FCC Form 471 discount calculation instructions that were applicable in funding years 2013 and 2014. The following language is from the 2014 FCC Form 471 application instructions, explaining how to calculate the discount for consortia applicants.

Discount Calculation for Consortia

If you checked the fourth box in Block 1, Item 5, as a consortium of schools, school districts, libraries (outlets/branches, systems) or any combination of the above, you should use these instructions.

Item 9a - If you are filing this application as:

- A consortium and you are requesting services that will go ONLY to an individual consortium member and will not be shared,
 - For an individual school or library outlet/branch member entity, enter a complete line as described above if you have not already done so on another worksheet.
 - For a school district or library system member entity, complete a worksheet as described above.
- A consortium and if ALL consortium members will share one or more services (whether or not those consortium members will also receive site-specific services),
 - For an individual school or library outlet/branch member entity, enter a complete line as described above plus Column 14 for each member entity.
 - For a school district or library system member entity, complete a separate worksheet to calculate the discount for that entity as described above, then complete Columns 1, 2 and 14 for each member entity.
 - When you have listed all your member entities that will share these services, complete Item 9b for consortia.
- A consortium, and some requested services will be shared by some consortium members and not others (whether or not those consortium members will also receive site-specific services), you must complete a separate worksheet for shared services as described above for each different group of consortium members sharing a service. You will then label the worksheets 1, 2, 3, etc.

The form's instructions allow for three scenarios under Item 9a, all based on the key word "services." Option 1 is for services delivered to only one consortium member. Option 2 is for services shared by all consortium members. Option 3 is for services shared by some but not all consortium members.

MOREnet's members were all sharing the same single service: "data transmission services" delivering consortium members' data traffic to the State network. Accordingly, MOREnet used the instructions for Option 2 to calculate its discount for each application, as all of the entities on the application received data transmission services. While MOREnet filed multiple FRNs to reflect the fact that services were being provided by multiple vendors, consistent with the Option 2 instructions MOREnet calculated the discount across all of the FRNs because they all reflected the same service that was being provided to all consortium members that were listed on each application.

In short, MOREnet reasonably read the FCC Form 471 instructions—specifically, instruction 9a, Option 2—to permit averaging across multiple FRNs within a single application, because the instructions focused on the provision of the same service to all entities listed on a single application, with no mention of whether an application included a single FRN or more than one. Again, to be clear, the multiple FRNs in MOREnet’s applications did not reflect a variety of *services*, but rather the *same* service provided to all consortium members by a variety of *vendors*.

Nevertheless, USAC’s analysis appears to assume each FRN represents a separate service, and therefore that MOREnet should have followed Option 1 or Option 3 under instruction 9a. But the Commission has never indicated its intent to separate last-mile Internet services from other Internet access services. Internet access services are not typically separated that way; they are typically end-to-end seamless services, not purchased piecemeal. It was entirely reasonable for MOREnet to consider its Internet access services as a shared service provided by the state network and distributed among its consortia members. Under USAC’s approach, every last-mile circuit would need its own funding request because the services were not “shared.” This would effectively mean each and every funding request would need its own discount calculation worksheet and each and every last-mile circuit would need its own funding request.

Compare that outcome – a funding request with a different discount for every one of MOREnet’s 500 entities – with the prior Commission orders. In 1997, in the *Fourth Order on Reconsideration*, the Commission revised the rules on discount calculation for consortia adopted

in the *First Report and Order* (released just six months earlier).²³ The Commission stated that consortia, which included school districts, only required that discount rates and provision of support should be determined for each individual school or library, if “not unreasonably burdensome to do so.”²⁴ The Commission gave the example of internal connections as a type of service used only by an individual school.²⁵ Here, it would be unreasonably burdensome to require MOREnet to submit an individual funding request or application for each member entity. Such a requirement would also be contrary to the purposes of a consortium, one of which is to reduce administrative burdens on applicants. It would be unreasonably burdensome for MOREnet to create and submit a separate funding request for each of its 500 members, in addition to separate funding requests for network aggregation services.

²³ See 47 C.F.R. § 54.505(d) (1997) (“Consortia. Consortia applying for discounted services on behalf of their members shall calculate the portion of the total bill eligible for a discount using a weighted average based on the share of the pre-discount price for which each eligible school or library agreed to be financially liable. Each eligible school, school district, library or library consortia will be credited with the discount to which it is entitled.”); see also Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order*, 12 FCC Rcd 8776 at 9341-42 (1997) (*First Report and Order*) (providing the proposed rule language).

²⁴ The Commission also noted that consortia must calculate their discount rates based on a “weighted average,” but adopted a rule that only required an average calculation. See 47 C.F.R. § 505(d); see also Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Fourth Order on Reconsideration*, CC Docket Nos. 96-45 *et al. Report and Order*, 13 FCC Rcd 5318, ¶ 205 (“Because the discount is based on the weighted average of the amount for which each individual school or library agrees to be financially liable, we conclude that the amount of support likewise should be determined, where possible, on the discount rate to which each individual school or library is entitled. In other words, both the discount rate and the provision of support should be determined for each individual school or library, if not unreasonably burdensome to do so.”). It is unclear how the 1997 discussion on shared services would be applicable to calculations using a simple average, instead of a weighted average, given that the discussion regarding shared services appeared to be applicable only to the weighted average discounts.

²⁵ *Id.*

c. USAC's Current Consortia Calculation in EPC Uses the Same Calculation Methodology as MOREnet Did in FY2013 and FY2014.

More tellingly, USAC has noted that FY 2016 and FY 2017 consortia discounts must be calculated by EPC exactly as MOREnet did in FY 2013 and 2014.

As Ms. Ayer wrote, for FY 2016, “all FRNs on a consortium app get the same discount rate, but the discount reflects only those BENs that receive service on that application.” In FY 2013 and FY 2014, MOREnet used the same discount rate for every funding request on its applications, and every BEN listed on the application received service under that application. The Commission has not made any changes to the consortia discount rule that would result in this rule being the correct way to calculate the discount now, but the wrong way to calculate it three funding years ago.²⁶ If the current rule is correct, then what MOREnet did three years ago was also correct.

Furthermore, Ms. Ayer's supports MOREnet's methodology as allowed under the rules.²⁷ At first, she says that consortia *funding requests* should only include the entities receiving the services. She then states that an *application* should only include consortia entities receiving services. The latter is exactly what MOREnet did; it only included entities on a specific application that were receiving services under that application. MOREnet did not include all of its consortia members on every application. As Ms. Ayer noted, all FRNs on a single application will receive the same discount rate. That is how MOREnet calculated its discount rate for

²⁶ The only discount rate change the Commission made in the Modernization Orders was to require school districts to use one weighted rate for all members, regardless of which entities were receiving service on a particular application. *First Modernization Order*, ¶ 210. This only affects the underlying districts' discount rates; it did not change the way in which consortia calculated their rates.

²⁷ See Exhibit 6, Email from C. Ayer, USAC, to C. Schneider, MOREnet.

funding years 2013 and 2014. According to Ms. Ayer’s own interpretation of the rules, MOREnet has complied with the discount calculation rule.

Alternatively, USAC may be claiming that if entities are not receiving the exact same service from the same provider on the same circuit, the entities are not “sharing” the service. This interpretation could effectively eliminate consortia applications. Every individual entity would have to have its own application in order to get only its own discount for services that it is receiving – every last-mile service would have to have its own application to receive its own discount. For MOREnet that would mean more than 500 individual applications.

In contrast to that result, the Commission has repeatedly encouraged applicants to submit consortia applications and has urged USAC to reduce the administrative burdens associated with consortia filings.²⁸ In fact, the Commission noted that one benefit of its adoption of a district-wide discount rate would be to make consortia applications simpler and more equitable.²⁹ It simply would defy common sense for the Commission to adopt such policies and then support a rule that would essentially eliminate many of the benefits of filing as a consortium.

III. EVEN USING USAC’S ANALYSIS, THE PROPOSED RECOVERY AMOUNTS ARE INCORRECT.

Even if USAC’s interpretation was correct, USAC did not properly calculate the recovery amounts. Every discount assigned to consortia member entities was a whole number. Whole

²⁸ In the *First Modernization Order*, the Commission found that “[c]onsortium purchasing can drive down the prices paid by schools and libraries for E-rate supported services.” In light of this core finding, the Commission determined to “adopt rules to make it easier for applicants to take advantage of consortium bidding” and to “reduce or eliminate some of the existing barriers to applicants’ participation in consortia” by, among other things, “direct[ing] Commission staff to work with USAC to prioritize review of consortia applications, . . . particularly with respect to state and regional consortia applications.” By so doing, the Commission “expect[s] that the improved processing times for consortia applications will result in more funding commitments flowing faster to schools and libraries, *which will motivate more applicants to join consortia in future funding years.*” *First Modernization Order*, ¶¶ 168-169.

²⁹ *Id.* at ¶ 212.

number discounts for school districts were very uncommon until FY 2015 when the discount calculation for districts was revised. It appears that the applied entity discount therefore is not accurate for the funding years at issue. In addition, the discount rates for individual entities used by USAC to recalculate the discounts are not consistent with the approved Missouri State Data File from each period.³⁰ The impact on the reported figures using the same FRN average discount method and the correct State Data file discount is calculated within attached spreadsheets.³¹ Note that the corrected totals for each FRN can be found on Exhibits 1 and 2.

USAC also appears to have calculated the discount using the building address the Internet access services were delivered to, instead of the discount for the *school district* the services were delivered to. Internet access services are being provided to the entire school district, not just the building where the services terminate, and USAC should have used the appropriate calculation for the district.

Regardless of these flaws, USAC's primary error was that it concluded that MOREnet cannot calculate its discount based on the simple average of all of the entities listed on the application. That was the rule in funding years 2013 and 2014, and it is the way EPC currently processes consortium applications.

IV. IN THE ALTERNATIVE, THE COMMISSION SHOULD WAIVE THE DISCOUNT CALCULATION RULE BECAUSE MORENET'S INTERPRETATION OF THE RULES WAS MADE IN GOOD FAITH

As we have explained, MOREnet properly calculated and used the consortium discount for members on numerous applications in funding years 2013 and 2014. Indeed, MOREnet used the methodology that USAC itself uses today. No rule changes in the Modernization Orders

³⁰ See FY 2013 and FY 2014 State Data Files, Exhibits 11 and 12.

³¹ See Exhibit 5 (FY 2013) and Exhibit 4 (FY 2014).

would have changed how a consortium calculated its discount. If the Commission disagrees, however, we respectfully ask the Commission to waive its rules.

Any of the Commission's rules may be waived if good cause is shown.³² The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.³³ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.³⁴

As we have noted above, MOREnet followed the instructions on the FCC Form 471 to determine the discounts for Internet access services on its applications. Furthermore, the methodology MOREnet used for FYs 2013 and 2014 is the exact same methodology USAC uses with EPC today to calculate the discount rate for consortia applications.

If the Commission believes USAC's interpretation may be an acceptable reading of form instructions, MOREnet's interpretation is at least equally reasonable and the Commission should defer to MOREnet because its interpretation was reasonable. Even if USAC's view was the only correct interpretation, USAC should have raised the issue of methodology to MOREnet prior to funding the applications. If USAC believed that every last-mile circuit needed to have the discount of only that school district or library, it should have noticed that every funding request on each of MOREnet's applications had the same discount rate. That should have raised a red flag for USAC to investigate the calculation that MOREnet was using. It is only years after disbursing this funding that USAC has indicated it believes MOREnet has been using an

³² 47 C.F.R. § 1.3.

³³ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

³⁴ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

incorrect methodology. It would have been much less harmful for USAC to discuss its concerns with MOREnet prior to disbursing the funding. As such, it is unjust that USAC seeks to revise its analysis of MOREnet's applications at this point.

Moreover, there is no evidence of waste, fraud or abuse here. The schools received the benefit of the eligible services purchased. To the contrary, it would be fundamentally unjust for the Commission to allow the recovery of \$400,000 to proceed.

V. CONCLUSION

We respectfully request that the Bureau grant this appeal and reverse USAC's commitment adjustments and cease seeking recovery of these funds for funding years 2013 and 2014.

Respectfully submitted,

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March 23, 2018

CERTIFICATE OF SERVICE

This is to certify that on this 23rd day of March, 2018, a true and correct copy of the foregoing Request for Review was sent via email to the Schools and Libraries Division, Universal Service Administrative Company at the Appeals@sl.universalservice.org address.

/s/Theresa K. Schrader

EXHIBIT LIST

- Exhibit 1: List of all the reduced FRNs for funding year 2013
- Exhibit 2: List of all the reduced FRNs for funding year 2014
- Exhibit 3: FY 2014 Notification of Commitment Adjustment Letter dated June 30, 2017
- Exhibit 4: FY 2014 spreadsheet showing USAC-disputed FRNs
- Exhibit 5: FY 2013 spreadsheet showing USAC-disputed FRNs
- Exhibit 6: Email from Catriona Ayer, Senior Director, Schools and Libraries Division, USAC, to Chris Schneider, MOREnet, dated March 28, 2017
- Exhibit 7: Response from Chris Schneider, MOREnet, to USAC
- Exhibit 8: Chart Showing Building Discount Rates Instead of District Rates
- Exhibit 9: USAC's denial of MOREnet's Appeal
- Exhibit 10: List of all recipients of service on FY2014 FCC Form 471 # 973727
- Exhibit 11: State Data File FY 2013
- Exhibit 12: State Data File FY 2014