

Exhibit A
Administrator's Decision on Appeal



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2013-2014

January 23, 2018

Richard Senturia
eRate Program, LLC
9666 Olive Street Blvd., Suite 215
St. Louis, MO 63132

Re: Applicant Name: SCHOOL DISTRICT OF THE CITY OF
ST. CHARLES
Billed Entity Number: 136937
Form 471 Application Number: 928601
Funding Request Number(s): 2536087
Your Correspondence Dated: January 08, 2018

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2013 Notification of Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2536087
Decision on Appeal: **Denied**
Explanation:

- During review, it was determined the FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCC's competitive bidding rules. Specifically, The FRN requests 1 gbps optical internet WAN circuits. The 470 requests "internet access with firewall included and voip services 100 mbps thru Morenet." The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which the applicant sought funding were not

properly posted to the website for competitive bidding, the commitment was been rescinded in full and USAC made a determination to seek recovery of any improperly disbursed funds from the applicant. In your appeal, you did not provide any new information that could overturn the original decision. Your appeal did not show that USAC's determination was incorrect. Consequently, your appeal is denied.

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2014-2015

January 23, 2018

Richard Senturia
eRate Program, LLC
9666 Olive, Ste. 215
St. Louis, MO 63132

Re: Applicant Name: SCHOOL DISTRICT OF THE CITY OF
ST. CHARLES
Billed Entity Number: 136937
Form 471 Application Number: 961287
Funding Request Number(s): 2611835
Your Correspondence Dated: January 08, 2018

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2014 Notification of Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2611835
Decision on Appeal: **Denied**
Explanation:

- During review, it was determined the FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCC's competitive bidding rules. Specifically, The FRN requests 1 gbps optical internet WAN circuits. The 470 requests "internet access with firewall included and voip services 100 mbps thru Morenet." The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which the applicant sought funding were not

properly posted to the website for competitive bidding, the commitment was been rescinded in full and USAC made a determination to seek recovery of any improperly disbursed funds from the applicant. In your appeal, you did not provide any new information that could overturn the original decision. Your appeal did not show that USAC's determination was incorrect. Consequently, your appeal is denied.

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

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Schools and Libraries Division
Universal Service Administrative Company



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2015-2016

January 23, 2018

Richard Senturia
eRate Program, LLC
9666 Olive Blvd., Suite 215
St. Louis, MO 63132

Re: Applicant Name: SCHOOL DISTRICT OF THE CITY OF
ST. CHARLES
Billed Entity Number: 136937
Form 471 Application Number: 1006874
Funding Request Number(s): 2733976
Your Correspondence Dated: January 08, 2018

After review of the information and documentation provided, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's decision to adjust the funding commitment amount for the FCC Form 471 Application and funding request number(s) (FRN(s)) referenced above. This letter provides an explanation for USAC's decision. The date of this letter also begins the sixty (60) day time period for appealing this decision. If your Letter of Appeal included more than one FCC Form 471 Application Number, please note that you will receive a separate decision for each funding application.

Funding Request Number(s): 2733976
Decision on Appeal: **Denied**
Explanation:

- During review, it was determined the FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCC's competitive bidding rules. Specifically, The FRN requests 1 gbps optical internet WAN circuits. The 470 requests "internet access with firewall included and voip services 100 mbps thru Morenet." The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which the applicant sought funding were not

properly posted to the website for competitive bidding, the commitment was been rescinded in full and USAC made a determination to seek recovery of any improperly disbursed funds from the applicant. In your appeal, you did not provide any new information that could overturn the original decision. Your appeal did not show that USAC's determination was incorrect. Consequently, your appeal is denied.

If you wish to appeal this decision, you may file an appeal pursuant to 47 C.F.R. Part 54, Subpart I. Detailed instructions for filing appeals are available at:
<http://www.usac.org/sl/about/program-integrity/appeals.aspx>.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

Exhibit B
FY 2016 USAC Letter of Appeal

LETTER of APPEAL

COMAD Appeal # 87622 FY14

111775149-001 January 8, 2017

3/1/18 Pending

Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Applicant/Appellant Name:	Richard Senturia, Consultant for Applicant/Appellant
Applicant/Appellant:	School District of the City of St. Charles
FCC Registration Number:	0013934518
Billed Entity Number (BEN)	136937
Form 471 Application Number:	161029263
Funding Request Number(s):	1699059727
Commitment Adjustment Letter:	12/20/17

To whom it may concern:

We appeal the Commitment Adjustment Letter (“COMAD”) revoking funding for the School District of the City of St. Charles (BEN 136937) and seek restoration of funding for FRN 1699059727.

The COMAD revoked funding of FRN 1699059727 on the following basis:

[I]t has been determined that this funding commitment must be rescinded in full. The FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCCs competitive bidding rules. Specifically, the FRN requests 1gbps optical internet WAN circuits. The 470 requests “internet access with firewall included and voip services 100 mbps thru Morenet.” The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.

However, the purported insufficiency of the relevant Form 470 arose from a simple ministerial/clerical error, and USAC should not deny or adjust the FRN on that basis. The

ministerial/clerical error appears obvious from the face of the Form 470, and from the surrounding context and circumstances.

Moreover, the ministerial/clerical error does not obscure the meaning of the funding request or render it invalid. No waste, fraud or abuse arose from this funding request. The funding request resulted in receipt of eligible services from an eligible vendor, with no negative or improper effect on the Schools and Libraries Program.

This consultant files many Forms 470 listing internet specifications that state, "100 mbps or more." In the case of this particular FRN, the employee who prepared the Form 470 transcribed "or more" incorrectly onto the Form 470 as "100 Mbps thru Morenet."

As USAC records demonstrate, this applicant purchased internet WAN services at least as far back as 2001, and received funding for such service. Neither the applicant nor the consultant would have included the words "thru Morenet," because that vendor does not offer the WAN services sought by the applicant. Therefore, inclusion of the word "Morenet" was on its face a ministerial/clerical error.

The applicant also appropriately considered bids from all service providers who responded. No vendor ever complained that they were precluded from bidding on the applicant's request, and the applicant is unaware of any potential vendor offering the requested services that did not bid pursuant to the Form 470.

This consultant, eRate Program, LLC, filed thousands of Forms 470 over the course of more than a decade for thousands of applicants and, as standard practice, does not identify any specific vendors in a Form 470. The consultant scrupulously complies with all FCC and USAC rules, regulations and requirements in its filings. The consultant's employee who filed the Form 470 was relatively new at the time, and has not been employed by the consultant since March 2014.

Given the evidence presented, and in light of the ministerial/clerical error, we request restoration of funding for FRN 1699059727.

Please reference our appeals filed contemporaneously for the following:

Application 928601 FRN 2536087

Application 961287 FRN 2611835

Application 1006874 FRN 2733976

Please also reference our pending appeal, #87077 for Application 171037633 FRN 1799084213.

Respectfully,

Richard Senturia

eRate Program, LLC

9666 Olive Blvd., Suite 215

(314) 282-3676

rsenturia@erateprogram.com

Consultant for Applicant/Appellant

Exhibit C
USC COMAD Letters for FY 2013-2016

Emily Wisdom

SCHOOL DISTRICT OF THE CITY OF ST. CHARLES

400 NORTH SIXTH STREET

SAINT CHARLES, MO 63301



Commitment Adjustment Letter

Emily Wisdom

12/20/2017

SCHOOL DISTRICT OF THE CITY OF ST. CHARLES
400 NORTH SIXTH STREET
SAINT CHARLES, MO 63301

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 commitment adjustment: \$70,819.84

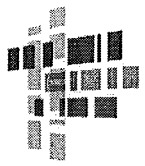
Total amount to be recovered: \$69,119.95

<i>FCC Form 471</i>	<i>FRN</i>	<i>Commitment adjustment</i>	<i>Total amount to be recovered</i>	<i>Explanation(s)</i>	<i>Party to recover from</i>
928601	2536087	\$70,819.84	\$69,119.95	Comp. Bidding Violation; Form 470 Not Posted	Applicant

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

Commitment Adjustment

FCC rules require the Universal Service Administrative Company (USAC) to rescind commitments and recover funding when it is determined that funding was committed and disbursed in violation of the rules. This letter notifies you that USAC will be adjusting your funding commitment(s) 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>

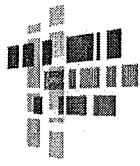
To Appeal This Decision

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., Commitment Adjustment Letter) 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. "Commitment Adjustment Letter," AND the exact text or 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.

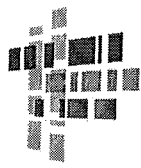
The FCC recommends filing appeals or waiver requests with the Electronic Comment Filing System (ECFS) to ensure timely filing. Electronic waiver requests or appeals will be considered filed on a business day if they are received at any time before 11:59 PM ET. If you have questions or comments about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

cc: Marcia Evans

Charter Fiberlink - Missouri, LLC



Adjustment Report

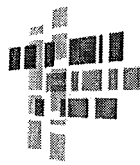
FCC Form 471 Application Number: 928601
Funding Request Number: 2536087
Commitment Adjustment: \$70,819.84
Total Amount to Be Recovered: \$69,119.95
Explanation(s): Comp. Bidding Violation; Form 470 Not Posted

Party to Recover From: Applicant
Funding Year: 2013
Billed Entity Number: 136937
Services Ordered: TELCOMM SERVICES
Service Provider Name: Charter Fiberlink - Missouri, LLC
SPIN: 143024207
Original Funding Commitment: \$70,819.84
Adjusted Funding Commitment: \$0.00
Funds Disbursed to Date: \$69,119.95

Funding Commitment Adjustment Explanation

After a thorough investigation, it has been determined that this funding commitment must be rescinded in full. The FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCC's competitive bidding rules. Specifically, The FRN requests 1gbps optical internet WAN circuits. The 470 requests "internet access with firewall included and voip services 100 mbps thru Morenet." The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.

Emily Wisdom
SCHOOL DISTRICT OF THE CITY OF ST. CHARLES
400 NORTH SIXTH STREET
SAINT CHARLES, MO 63301



Universal Service
Administrative Co.

Commitment Adjustment Letter

Emily Wisdom
SCHOOL DISTRICT OF THE CITY OF ST. CHARLES
400 NORTH SIXTH STREET
SAINT CHARLES, MO 63301

12/20/2017

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 commitment adjustment: \$72,372.96

Total amount to be recovered: \$72,372.96

<i>FCC Form 471</i>	<i>FRN</i>	<i>Commitment adjustment</i>	<i>Total amount to be recovered</i>	<i>Explanation(s)</i>	<i>Party to recover from</i>
961287	2611835	\$72,372.96	\$72,372.96	Comp. Bidding Violation; Form 470 Not Posted	Applicant

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

Commitment Adjustment

FCC rules require the Universal Service Administrative Company (USAC) to rescind commitments and recover funding when it is determined that funding was committed and disbursed in violation of the rules. This letter notifies you that USAC will be adjusting your funding commitment(s) 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

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

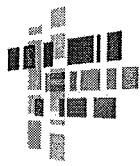
To Appeal This Decision

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.

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- 2) Indicate specifically that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., Commitment Adjustment Letter) 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. "Commitment Adjustment Letter," 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.

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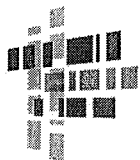
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Schools and Libraries Division

cc: Marcia Evans

Charter Fiberlink - Missouri, LLC



Adjustment Report

FCC Form 471 Application Number: 961287
Funding Request Number: 2611835
Commitment Adjustment: \$72,372.96
Total Amount to Be Recovered: \$72,372.96
Explanation(s): Comp. Bidding Violation; Form 470 Not Posted

Party to Recover From: Applicant
Funding Year: 2014
Billed Entity Number: 136937
Services Ordered: INTERNET ACCESS
Service Provider Name: Charter Fiberlink - Missouri, LLC
SPIN: 143024207
Original Funding Commitment: \$72,372.96
Adjusted Funding Commitment: \$0.00
Funds Disbursed to Date: \$72,372.96

Funding Commitment Adjustment Explanation

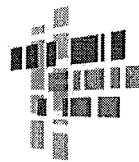
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Emily Wisdom

SCHOOL DISTRICT OF THE CITY OF ST. CHARLES

400 NORTH SIXTH STREET

SAINT CHARLES, MO 63301



Commitment Adjustment Letter

Emily Wisdom
SCHOOL DISTRICT OF THE CITY OF ST. CHARLES
400 NORTH SIXTH STREET
SAINT CHARLES, MO 63301

12/20/2017

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 commitment adjustment: \$65,793.60

Total amount to be recovered: \$61,743.60

<i>FCC Form 471</i>	<i>FRN</i>	<i>Commitment adjustment</i>	<i>Total amount to be recovered</i>	<i>Explanation(s)</i>	<i>Party to recover from</i>
1006874	2733976	\$65,793.60	\$61,743.60	Comp. Bidding Violation; Form 470 Not Posted	Applicant

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

Commitment Adjustment

FCC rules require the Universal Service Administrative Company (USAC) to rescind commitments and recover funding when it is determined that funding was committed and disbursed in violation of the rules. This letter notifies you that USAC will be adjusting your funding commitment(s) 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."

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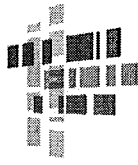
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 - e. "Commitment Adjustment Letter," AND the exact text or the decision that you are appealing.



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.

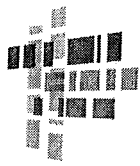
The FCC recommends filing appeals or waiver requests with the Electronic Comment Filing System (ECFS) to ensure timely filing. Electronic waiver requests or appeals will be considered filed on a business day if they are received at any time before 11:59 PM ET. If you have questions or comments about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

cc: Marcia Evans

Charter Fiberlink - Missouri, LLC



Adjustment Report

FCC Form 471 Application Number: 1006874
Funding Request Number: 2733976
Commitment Adjustment: \$65,793.60
Total Amount to Be Recovered: \$61,743.60
Explanation(s): Comp. Bidding Violation; Form 470 Not Posted

Party to Recover From: Applicant
Funding Year: 2015
Billed Entity Number: 136937
Services Ordered: INTERNET ACCESS
Service Provider Name: Charter Fiberlink - Missouri, LLC
SPIN: 143024207
Original Funding Commitment: \$65,793.60
Adjusted Funding Commitment: \$0.00
Funds Disbursed to Date: \$61,743.60

Funding Commitment Adjustment Explanation

After a thorough investigation, it has been determined that this funding commitment must be rescinded in full. The FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCC's competitive bidding rules. Specifically, The FRN requests 1gbps optical internet WAN circuits. The 470 requests "internet access with firewall included and voip services 100 mbps thru Morenet." The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.



Commitment Adjustment Letter

Emily Wisdom

11/20/2017

SCHOOL DISTRICT OF THE CITY
OF ST. CHARLES
400 NORTH SIXTH STREET
SAINT CHARLES, MO 63301

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 commitment adjustment: \$99,640.80

Total amount to be recovered: \$94,240.80

FCC Form 471	FRN	Commitment adjustment	Total amount to be recovered	Explanation(s)	Party to recover from
161029263	1699059727	\$99,640.80	\$94,240.80	Failure to post a FCC Form 470 for the category of service for which the applicant sought funding on the FCC Form 471	BEN

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

Commitment Adjustment

FCC rules require the Universal Service Administrative Company (USAC) to rescind commitments and recover funding when it is determined that funding was committed and disbursed in violation of the rules. This letter notifies you that USAC will be adjusting your funding commitment(s) 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., Commitment Adjustment Letter) 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. "Commitment Adjustment Letter," AND the exact text or 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:	161029263
Funding Request Number:	1699059727
Commitment Adjustment:	\$99,640.80
Total Amount to Be Recovered:	\$94,240.80
Explanation(s):	Failure to post a FCC Form 470 for the category of service for which the applicant sought funding on the FCC Form 471
Party to Recover From:	BEN
Funding Year:	2016
Billed Entity Number:	136937
Services Ordered:	Data Transmission and/or Internet Access
Service Provider Name:	Charter Fiberlink - Missouri, LLC
SPIN:	143024207
Original Funding Commitment:	\$99,640.80
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$94,240.80

Funding Commitment Adjustment Explanation:

After a thorough investigation, it has been determined that this funding commitment must be rescinded in full. The FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCC's competitive bidding rules. Specifically, The FRN requests 1gbps optical internet WAN circuits. The 470 requests "internet access with firewall included and voip services 100 mbps thru Morenet." The Form 470 doesn't correlate to the service requested in the FRN. Accordingly, the Form 470 doesn't properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.

Exhibit D
Letter of Appeals for FY 2013-2017

LETTER of APPEAL

COMAD Appeal FY13

January 8, 2017

Denied 1/23/18

Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Applicant/Appellant Name:	Richard Senturia, Consultant for Applicant/Appellant
Applicant/Appellant:	School District of the City of St. Charles
FCC Registration Number:	0013934518
Billed Entity Number (BEN)	136937
Form 471 Application Number:	928601
Funding Request Number(s):	2536087
Commitment Adjustment Letter:	12/20/17

To whom it may concern:

We appeal the Commitment Adjustment Letter (“COMAD”) revoking funding for the School District of the City of St. Charles (BEN 136937) and seek restoration of funding for FRN 2536087.

The COMAD revoked funding of FRN 2536087 on the following basis:

[I]t has been determined that this funding commitment must be rescinded in full. The FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCCs competitive bidding rules. Specifically, the FRN requests 1gbps optical internet WAN circuits. The 470 requests “internet access with firewall included and voip services 100 mbps thru Morenet.” The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.

However, the purported insufficiency of the relevant Form 470 arose from a simple ministerial/clerical error, and USAC should not deny or adjust the FRN on that basis. The

ministerial/clerical error appears obvious from the face of the Form 470, and from the surrounding context and circumstances.

Moreover, the ministerial/clerical error does not obscure the meaning of the funding request or render it invalid. No waste, fraud or abuse arose from this funding request. The funding request resulted in receipt of eligible services from an eligible vendor, with no negative or improper effect on the Schools and Libraries Program.

This consultant files many Forms 470 listing internet specifications that state, "100 mbps or more." In the case of this particular FRN, the employee who prepared the Form 470 transcribed "or more" incorrectly onto the Form 470 as "100 Mbps thru Morenet."

As USAC records demonstrate, this applicant purchased internet WAN services at least as far back as 2001, and received funding for such service. Neither the applicant nor the consultant would have included the words "thru Morenet," because that vendor does not offer the WAN services sought by the applicant. Therefore, inclusion of the word "Morenet" was on its face a ministerial/clerical error.

The applicant also appropriately considered bids from all service providers who responded. No vendor ever complained that they were precluded from bidding on the applicant's request, and the applicant is unaware of any potential vendor offering the requested services that did not bid pursuant to the Form 470.

This consultant, eRate Program, LLC, filed thousands of Forms 470 over the course of more than a decade for thousands of applicants and, as standard practice, does not identify any specific vendors in a Form 470. The consultant scrupulously complies with all FCC and USAC rules, regulations and requirements in its filings. The consultant's employee who filed the Form 470 was relatively new at the time, and has not been employed by the consultant since March 2014.

Given the evidence presented, and in light of the ministerial/clerical error, we request restoration of funding for FRN 2536087.

Please reference our appeals filed contemporaneously for the following:

Application 961287 FRN 2611835

Application 1006874 FRN 2733976

Application 161029263 FRN 1699059727

Please also reference our pending appeal, #87077 for Application 171037633 FRN 1799084213.

Respectfully,

Richard Senturia

eRate Program, LLC

9666 Olive Blvd., Suite 215

(314) 282-3676

rsenturia@erateprogram.com

Consultant for Applicant/Appellant

LETTER of APPEAL

COMAD Appeal FY14

Denied 1/23/18

January 8, 2017

Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Applicant/Appellant Name:	Richard Senturia, Consultant for Applicant/Appellant
Applicant/Appellant:	School District of the City of St. Charles
FCC Registration Number:	0013934518
Billed Entity Number (BEN)	136937
Form 471 Application Number:	961287
Funding Request Number(s):	2611835
Commitment Adjustment Letter:	12/20/17

To whom it may concern:

We appeal the Commitment Adjustment Letter (“COMAD”) revoking funding for the School District of the City of St. Charles (BEN 136937) and seek restoration of funding for FRN 2611835.

The COMAD revoked funding of FRN 2611835 on the following basis:

[I]t has been determined that this funding commitment must be rescinded in full. The FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCCs competitive bidding rules. Specifically, the FRN requests 1gbps optical internet WAN circuits. The 470 requests “internet access with firewall included and voip services 100 mbps thru Morenet.” The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.

However, the purported insufficiency of the relevant Form 470 arose from a simple ministerial/clerical error, and USAC should not deny or adjust the FRN on that basis. The

ministerial/clerical error appears obvious from the face of the Form 470, and from the surrounding context and circumstances.

Moreover, the ministerial/clerical error does not obscure the meaning of the funding request or render it invalid. No waste, fraud or abuse arose from this funding request. The funding request resulted in receipt of eligible services from an eligible vendor, with no negative or improper effect on the Schools and Libraries Program.

This consultant files many Forms 470 listing internet specifications that state, "100 mbps or more." In the case of this particular FRN, the employee who prepared the Form 470 transcribed "or more" incorrectly onto the Form 470 as "100 Mbps thru Morenet."

As USAC records demonstrate, this applicant purchased internet WAN services at least as far back as 2001, and received funding for such service. Neither the applicant nor the consultant would have included the words "thru Morenet," because that vendor does not offer the WAN services sought by the applicant. Therefore, inclusion of the word "Morenet" was on its face a ministerial/clerical error.

The applicant also appropriately considered bids from all service providers who responded. No vendor ever complained that they were precluded from bidding on the applicant's request, and the applicant is unaware of any potential vendor offering the requested services that did not bid pursuant to the Form 470.

This consultant, eRate Program, LLC, filed thousands of Forms 470 over the course of more than a decade for thousands of applicants and, as standard practice, does not identify any specific vendors in a Form 470. The consultant scrupulously complies with all FCC and USAC rules, regulations and requirements in its filings. The consultant's employee who filed the Form 470 was relatively new at the time, and has not been employed by the consultant since March 2014.

Given the evidence presented, and in light of the ministerial/clerical error, we request restoration of funding for FRN 2611835.

Please reference our appeals filed contemporaneously for the following:

Application 928601 FRN 2536087

Application 1006874 FRN 2733976

Application 161029263 FRN 1699059727

Please also reference our pending appeal, #87077 for Application 171037633 FRN 1799084213.

Respectfully,

Richard Senturia
eRate Program, LLC
9666 Olive Blvd., Suite 215
(314) 282-3676
rsenturia@erateprogram.com
Consultant for Applicant/Appellant

LETTER of APPEAL

COMAD Appeal FY15

January 8, 2017

Denied 11/23/18

Schools and Libraries Division – Correspondence Unit

30 Lanidex Plaza West

PO Box 685

Parsippany, NJ 07054-0685

Applicant/Appellant Name:	Richard Senturia, Consultant for Applicant/Appellant
Applicant/Appellant:	School District of the City of St. Charles
FCC Registration Number:	0013934518
Billed Entity Number (BEN)	136937
Form 471 Application Number:	1006874
Funding Request Number(s):	2733976
Commitment Adjustment Letter:	12/20/17

To whom it may concern:

We appeal the Commitment Adjustment Letter ("COMAD") revoking funding for the School District of the City of St. Charles (BEN 136937) and seek restoration of funding for FRN 2733976.

The COMAD revoked funding of FRN 2733976 on the following basis:

[I]t has been determined that this funding commitment must be rescinded in full. The FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCC's competitive bidding rules. Specifically, the FRN requests 1gbps optical internet WAN circuits. The 470 requests "internet access with firewall included and voip services 100 mbps thru Morenet." The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.

However, the purported insufficiency of the relevant Form 470 arose from a simple ministerial/clerical error, and USAC should not deny or adjust the FRN on that basis. The

ministerial/clerical error appears obvious from the face of the Form 470, and from the surrounding context and circumstances.

Moreover, the ministerial/clerical error does not obscure the meaning of the funding request or render it invalid. No waste, fraud or abuse arose from this funding request. The funding request resulted in receipt of eligible services from an eligible vendor, with no negative or improper effect on the Schools and Libraries Program.

This consultant files many Forms 470 listing internet specifications that state, "100 mbps or more." In the case of this particular FRN, the employee who prepared the Form 470 transcribed "or more" incorrectly onto the Form 470 as "100 Mbps thru Morenet."

As USAC records demonstrate, this applicant purchased internet WAN services at least as far back as 2001, and received funding for such service. Neither the applicant nor the consultant would have included the words "thru Morenet," because that vendor does not offer the WAN services sought by the applicant. Therefore, inclusion of the word "Morenet" was on its face a ministerial/clerical error.

The applicant also appropriately considered bids from all service providers who responded. No vendor ever complained that they were precluded from bidding on the applicant's request, and the applicant is unaware of any potential vendor offering the requested services that did not bid pursuant to the Form 470.

This consultant, eRate Program, LLC, filed thousands of Forms 470 over the course of more than a decade for thousands of applicants and, as standard practice, does not identify any specific vendors in a Form 470. The consultant scrupulously complies with all FCC and USAC rules, regulations and requirements in its filings. The consultant's employee who filed the Form 470 was relatively new at the time, and has not been employed by the consultant since March 2014.

Given the evidence presented, and in light of the ministerial/clerical error, we request restoration of funding for FRN 2733976.

Please reference our appeals filed contemporaneously for the following:

Application 928601 FRN 2536087

Application 961287 FRN 2611835

Application 161029263 FRN 1699059727

Please also reference our pending appeal, #87077 for Application 171037633 FRN 1799084213.

Respectfully,

Richard Senturia

eRate Program, LLC

9666 Olive Blvd., Suite 215

(314) 282-3676

rsenturia@erateprogram.com

Consultant for Applicant/Appellant

LETTER of APPEAL

COMAD Appeal # 87622 FY14

111775149-001 January 8, 2017

3/1/18 Pending

Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Applicant/Appellant Name:	Richard Senturia, Consultant for Applicant/Appellant
Applicant/Appellant:	School District of the City of St. Charles
FCC Registration Number:	0013934518
Billed Entity Number (BEN)	136937
Form 471 Application Number:	161029263
Funding Request Number(s):	1699059727
Commitment Adjustment Letter:	12/20/17

To whom it may concern:

We appeal the Commitment Adjustment Letter (“COMAD”) revoking funding for the School District of the City of St. Charles (BEN 136937) and seek restoration of funding for FRN 1699059727.

The COMAD revoked funding of FRN 1699059727 on the following basis:

[I]t has been determined that this funding commitment must be rescinded in full. The FCC Form 470 did not properly include the service for which funding was sought in the FCC Form 471 application, which is a violation of the FCCs competitive bidding rules. Specifically, the FRN requests 1gbps optical internet WAN circuits. The 470 requests “internet access with firewall included and voip services 100 mbps thru Morenet.” The Form 470 does not correlate to the service requested in the FRN. Accordingly, the Form 470 does not properly competitively bid for the services requested in the FRN. FCC rules require that, except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support by submitting a complete FCC Form 470 to USAC web site for potential service providers to evaluate. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the applicant.

However, the purported insufficiency of the relevant Form 470 arose from a simple ministerial/clerical error, and USAC should not deny or adjust the FRN on that basis. The

ministerial/clerical error appears obvious from the face of the Form 470, and from the surrounding context and circumstances.

Moreover, the ministerial/clerical error does not obscure the meaning of the funding request or render it invalid. No waste, fraud or abuse arose from this funding request. The funding request resulted in receipt of eligible services from an eligible vendor, with no negative or improper effect on the Schools and Libraries Program.

This consultant files many Forms 470 listing internet specifications that state, "100 mbps or more." In the case of this particular FRN, the employee who prepared the Form 470 transcribed "or more" incorrectly onto the Form 470 as "100 Mbps thru Morenet."

As USAC records demonstrate, this applicant purchased internet WAN services at least as far back as 2001, and received funding for such service. Neither the applicant nor the consultant would have included the words "thru Morenet," because that vendor does not offer the WAN services sought by the applicant. Therefore, inclusion of the word "Morenet" was on its face a ministerial/clerical error.

The applicant also appropriately considered bids from all service providers who responded. No vendor ever complained that they were precluded from bidding on the applicant's request, and the applicant is unaware of any potential vendor offering the requested services that did not bid pursuant to the Form 470.

This consultant, eRate Program, LLC, filed thousands of Forms 470 over the course of more than a decade for thousands of applicants and, as standard practice, does not identify any specific vendors in a Form 470. The consultant scrupulously complies with all FCC and USAC rules, regulations and requirements in its filings. The consultant's employee who filed the Form 470 was relatively new at the time, and has not been employed by the consultant since March 2014.

Given the evidence presented, and in light of the ministerial/clerical error, we request restoration of funding for FRN 1699059727.

Please reference our appeals filed contemporaneously for the following:

Application 928601 FRN 2536087

Application 961287 FRN 2611835

Application 1006874 FRN 2733976

Please also reference our pending appeal, #87077 for Application 171037633 FRN 1799084213.

Respectfully,

Richard Senturia

eRate Program, LLC

9666 Olive Blvd., Suite 215

(314) 282-3676

rsenturia@erateprogram.com

Consultant for Applicant/Appellant

LETTER of APPEAL

USAC Appeal (CHARTER) FY17

December 22, 2017

Denied 2/27/18

Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Applicant/Appellant Name:	Richard Senturia, Consultant for Applicant/Appellant
Applicant/Appellant:	School District of the City of St. Charles
FCC Registration Number:	0013934518
Billed Entity Number (BEN)	136937
Form 471 Application Number:	171037633
Funding Request Number(s):	1799084213

To whom it may concern:

We appeal the Funding Commitment Decision denying funding for the School District of the City of St. Charles (BEN 136937) and seek restoration of funding for FRN 1799084213.

The reviewer denied funding of FRN 1799084213 on the following basis:

The FCC Form 470 that established the competitive bidding process for this FRN did not include service of this type; therefore it does not meet the 28 day competitive bidding requirement.

However, the purported insufficiency of the relevant Form 470 arose from a simple ministerial/clerical error, and USAC should not deny the FRN on that basis. The ministerial/clerical error appears obvious from the face of the Form 470, and from the surrounding context and circumstances.

Moreover, the ministerial/clerical error does not obscure the meaning of the funding request or render it invalid. No waste, fraud or abuse arose from this funding request. The funding request resulted in receipt of eligible services from an eligible vendor, with no negative or improper effect on the Schools and Libraries Program.

This consultant files many Forms 470 listing internet specifications that state, "100 mbps or more." In the case of this particular FRN, the employee who prepared the Form 470 transcribed "or more" incorrectly onto the Form 470 as "100 Mbps thru Morenet."

As USAC records demonstrate, this applicant purchased internet WAN services at least as far back as 2001, and received funding for such service. Neither the applicant nor the consultant would have included the words "thru Morenet," because that vendor does not offer the WAN services sought by the applicant. Therefore, inclusion of the word "Morenet" was on its face a ministerial/clerical error.

The applicant also appropriately considered bids from all service providers who responded. No vendor ever complained that they were precluded from bidding on the applicant's request, and the applicant is unaware of any potential vendor offering the requested services that did not bid pursuant to the Form 470.

This consultant, eRate Program, LLC, filed thousands of Forms 470 over the course of more than a decade for thousands of applicants and, as standard practice, does not identify any specific vendors in a Form 470. The consultant scrupulously complies with all FCC and USAC rules, regulations and requirements in its filings. The consultant's employee who filed the Form 470 was relatively new at the time, and has not been employed by the consultant since March 2014.

Given the evidence presented, and in light of the ministerial/clerical error, we request restoration of funding for FRN 1799084213.

Respectfully,

Richard Senturia
eRate Program, LLC
9666 Olive Blvd., Suite 215
(314) 282-3676
rsenturia@erateprogram.com
Consultant for Applicant/Appellant

Exhibit E
FY 2013 Form 470

Schools and Libraries Universal Service Description of Services Requested and Certification Form 470

Estimated Average Burden Hours per Response: 3 hours

This form is designed to help you describe the eligible services you seek so that this data can be posted on
the Fund Administrator Internet Site

and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before beginning this form.

Form 470 Application Number: 568560001042719	Applicant's Form Identifier: StChasSDMO13
Application Status: CERTIFIED	Posting Date: 08/23/2012
Allowable Contract Date: 09/20/2012	Certification Received Date: 08/23/2012

Block 1: Applicant Address and Information

1 Name of Applicant:

SCHOOL DISTRICT OF THE CITY OF ST. CHARLES

2 Funding Year: 2013 (Funding years run from July 1 through the following June 30)

3 Entity Number: 136937

4a Street Address, P.O.Box, or Route Number:

400 NORTH SIXTH STREET

City: SAINT CHARLES State: MO Zip Code: 63301 -0000

4b Telephone Number: (636) 443 -4000

4c Fax Number: (636) 443 -4001

5a Eligible Entities That Will Receive Services:

Check the ONE choice in 5a that best describes the eligible entities that will receive the services described in this form. You will then list in Item 15 the entity/entities that will pay the bills for these services.

- ☐ Individual School (individual public or non-public school)
- ☒ School District (LEA; public or non-public [e.g., diocesan] local district representing multiple schools)
- ☐ Library (including library system, library outlet/branch or library consortium as defined under LSTA)
- ☐ Consortium (intermediate service agencies, states, state networks, consortia of schools and/or libraries)
- ☐ Statewide application for (enter 2-letter state code)

representing (check all that apply)

☐ All public schools/districts in the state

☐ All non-public schools in the state

☐ All libraries in the state

5b Recipient(s) of Services - Check all that apply:

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	-------------------------------------	--------------------------

Private	Public	Charter
<input type="checkbox"/> Tribal	<input type="checkbox"/> Head Start	<input type="checkbox"/> State Agency

5c Number of eligible entities for which services are sought: 1

Block 1: Applicant Address and Information (continued)	
<p>6a Contact Person's Name: Richard Senturia</p> <p>If the Contact Person's Street Address is the same as Item 4a above, check here. <input type="checkbox"/> If not, complete Item 6b.</p> <p>6b Street Address, P.O.Box, or Route Number: NOTE: USAC will use this address to mail correspondence 9666 Olive Blvd. Suite 215 City: Olivette State: MO Zip Code: 63132 -3032</p> <p>Check the box next to your preferred mode of contact and provide your contact information. One box MUST be checked and an entry provided.</p> <p><input type="checkbox"/> 6c Telephone Number: (314) 282 -3676</p> <p><input type="checkbox"/> 6d Fax Number: (314) 395 -5882</p> <p><input checked="" type="checkbox"/> 6e E-Mail Address: rsenturia@erateprogram.com Re-enter E-mail Address: rsenturia@erateprogram.com</p> <p>If a consultant is assisting you with your application process, please complete Item 7 below:</p> <p>7 Consultant Name: RICHARD A SENTURIA Name of Consultant's Employer: ERateProgram, LLC Consultant's Street Address: 9666 Olive Blvd City: St. Louis State: MO Zip Code: 63132 Consultant's Telephone Number: (314) 282-3665 Ext. Consultant's Fax Number: (314) 395-5882 Consultant's E-mail Address: rsenturia@erateprogram.com Re-enter E-mail Address: rsenturia@erateprogram.com Consultant Registration Number: 16048902</p>	
Entity Number: 136937	Applicant's Form Identifier: StChasSDMO13
Contact Person: Richard Senturia	Phone Number: (314) 282-3676

Block 2: Summary Description of Needs or Services Requested	
8Telecommunication Services	
<p>If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.</p> <p>a <input type="checkbox"/> YES, I have released or intend to release an RFP for these services. It is available or will become available on the Internet at: or via (check one) <input type="checkbox"/> the contact person in Item 6 or <input type="checkbox"/> the contact person listed in Item 12 Your RFP Identifier:</p> <p>b <input checked="" type="checkbox"/> NO, I have not released and do not intend to release an RFP for these services.</p>	
Service	Quantity and/or Capacity

local telephone service with voice mail and VOIP service	T-1 1000 lines
long distance services	for all lines
cell phone services w/Email and unlimited data	85 or more phones
Other eligible telecom services	as needed

9Internet Access

If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.

a ☐ YES, I have released or intend to release an RFP for these services. It is available or will become available on the Internet at:
or via (check one) ☐ the contact person in Item 6 or ☐ the contact person listed in Item 12
Your RFP Identifier:

b ☒ NO, I have not released and do not intend to release an RFP for these services.

Whether you check YES or NO, you must list below the Internet Access services you seek. Specify each service (e.g., monthly Internet service) and quantity and/or capacity (e.g., for 500 users).

Service	Quantity and/or Capacity
internet access with firewall included and voip services	100 mbps thru Morenet
cell phone Plans with voice and unlimited data plans	85 plans or more
e-mail services and accounts	5200 or more
web hosting	invoice to show web hosting seperately
other eligible internet services	as needed

Entity Number: 136937

Applicant's Form Identifier: StChasSDMO13

Contact Person: Richard Senturia

Phone Number: (314) 282-3676

10Internal Connections Other Than Basic Maintenance

If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.

a ☐ YES, I have released or intend to release an RFP for these services. It is available or will become available on the Internet at:
or via (check one) ☐ the contact person in Item 6 or ☐ the contact person listed in Item 12
Your RFP Identifier:

b ☐ NO, I have not released and do not intend to release an RFP for these services.

Whether you check YES or NO, you must list below the Internal Connections services you seek. Specify each service (e.g., a router, hub and cabling) and quantity and/or capacity (e.g., connecting 1 classroom of 30 students).

11Basic Maintenance of Internal Connections

If you check YES to indicate you have a Request for Proposals (RFP) that specifies the services you are seeking, your RFP must be available to all interested bidders for at least 28 days. If your RFP is not available

to all interested bidders, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.

a ☐ YES, I have released or intend to release an RFP for these services. It is available or will become available on the Internet at:

or via (check one) ☐ the contact person in Item 6 or ☐ the contact person listed in Item 12

Your RFP Identifier:

b ☐ NO, I have not released and do not intend to release an RFP for these services.

Whether you check YES or NO, you must list below the Basic Maintenance services you seek. Specify each service (e.g., basic maintenance of routers) and quantity and/or capacity (e.g., for 10 routers).

Entity Number: 136937

Applicant's Form Identifier: StChasSDMO13

Contact Person: Richard Senturia

Phone Number: (314) 282-3676

12(Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This person does not need to be the contact person(s) listed in Item 6 nor the Authorized Person who signs this form.

Name:

Charles Brazeale

Title:

Superintendent

Telephone Number: (636) 443 - 4028

Fax Number:

Email Address: cbrazeale@stcharlessd.org

Re-enter E-mail Address: cbrazeale@stcharlessd.org

13 ☒ Check this box if there are any restrictions imposed by state or local laws or regulations on how or when service providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures and/or provide an Internet address where they are posted and a contact name and telephone number.

☐ Check this box if no state and local procurement/competitive bidding requirements apply to the procurement of services sought on this Form 470.

If you are requesting services for a funding year for which a Form 470 cannot yet be filed online, include that information here.

ATTENTION VENDORS: VENDORS MUST CONTACT ONLY THE APPLICANT'S CONTACT PERSON LISTED ABOVE FOR ANY QUESTIONS, BIDS, AND OR PROPOSALS. For our protection, the consultant does not talk with vendors by phone. Technical questions will be answered Only by the applicant contact person listed above.

Block 3:

14. [Reserved]

Entity Number: 136937

Applicant's Form Identifier: StChasSDMO13

Contact Person: Richard Senturia

Contact Phone Number: (314) 282-3676

Block 4: Recipients of Service

15 Billed Entities

List the entity/entities that will be paying the bills directly to the provider for the services requested in this form.

These are known as Billed Entities. At least one line of this item must be completed. If a Billed Entity cited on your FCC Form 471 is not listed below, funding may be denied for the funding requests associated with this FCC Form 470. Attach additional pages if needed.

Entity Number Entity Name

136937 SCHOOL DISTRICT OF THE CITY OF ST. CHARLES

Entity Number: 136937	Applicant's Form Identifier: StChasSDMO13
Contact Person: Richard Senturia	Contact Phone Number: (314) 282-3676

Block 5: Certifications and Signature

16 I certify that the applicant includes: (Check one or both.)

a 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; and/or

b libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools (including, but not limited to elementary and secondary schools, colleges, and universities).

17 ☐ I certify that, if required by Commission rules, all of the individual schools and libraries receiving services under this form are covered by technology plans that do or will cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, or an SLD-certified technology plan approver, prior to the commencement of service.

☒ Or I certify that no technology plan is required by Commission rules.

18 ☒ I certify that I will post my FCC Form 470 and (if applicable) make any applicable RFP available 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.

19 ☒ I certify that I will retain required documents for a period of at least five years after the last day of service delivered. 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.

20 ☒ 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.

21 ☒ 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.

22	<input checked="" type="checkbox"/> 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. 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
23	<input checked="" type="checkbox"/> 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.
24	<input checked="" type="checkbox"/> 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.

Entity Number: 136937	Applicant's Form Identifier: StChasSDMO13
Contact Person: Richard Senturia	Contact Phone Number: (314) 282-3676

25	Signature of authorized person: <input checked="" type="checkbox"/>	26	Date: 08/23/2012
27a Printed name of authorized person: Richard Senturia 27b Title or position of authorized person: Consultant <input checked="" type="checkbox"/> Check here if the consultant in Item 7 is the Authorized Person. 27c Street Address, P.O. Box, Route Number, City, State, Zip Code: 9666 Olive Blvd. Suite 215 City: Olivette State: MO Zip Code: 63132-3032 27d Telephone Number of Authorized Person: (314) 282-3676 27e Fax Number of Authorized Person: (314) 395-5882 27f E-mail Address of Authorized Person: rsenturia@erateprogram.com Re-enter E-mail Address: rsenturia@erateprogram.com 27g Name of Authorized Person's Employer: Erate Program, LLC			

<p align="center"> Service provider involvement with preparation or certification of an FCC Form 470 can taint the competitive bidding process and result in the denial of funding requests. For more information, refer to the Schools and Libraries area of the USAC web site at www.usac.org/sl or call the SLD Client Service Bureau at 1-888-203-8100. </p>
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Entity Number: 136937	Applicant's Form Identifier: StChasSDMO13
Contact Person: Richard Senturia	Phone Number: (314) 282-3676

NOTICE: In accordance with Section 54.503 of the Federal Communications Commission's rules, certain schools and libraries ordering services that are eligible for and seeking universal service discounts must file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator. 47 C.F.R. § 54.503(c). 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 competitive bidding requirement contained in 47 C.F.R. § 54.503. 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 this application 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 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, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

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 may delay processing of your application or may return your form 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 3 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.

Exhibit F
St. Charles's 2017 Selective Review Response

8/22/2017

BEN 136937 – School District of the City of St. Charles – Selective Review Follow Up #1

Application #171037633, 171003802

I. CDW Government (Form 471 #171003802 FRNs 17990006340, 1799006352, 1799006364, 1799006375, 1799006379, 1799006387, 1799006400, 1799006411)

- (a) Please provide copies of the bids received from Gov Connection and CDW Government.
- (b) Please provide a copy of the documentation that shows how you selected CDW Government.
- (c) In your response to the Selective Review Information Request, you indicated that Persevus LLC had inquired about equipment and then never responded to your follow up email. However, that correspondence was not included in your response. Please provide a copy of your correspondence with Persevus LLC.

II. Charter Fiberlink-Missouri (Form 471 #171037633, FRN 1799084213)

- 1. You have indicated in your response to the Selective Review Information Request that four bids were received for the services requested in this FRN.
 - (a) Please provide a list of the four bidders and the date on which each bid was received.
This was a project from 2013. We did not have separate bidders, to my knowledge we simply signed a new 5 year agreement with Charter.
 - (b) Please provide copies of all bids.
There were no separate bids for this project from 2013. We renewed our contract with Charter for an additional 5 years (60 months)
 - (c) Please indicate whether any bids were disqualified or non-responsive. If this is the case, please identify the reason why each of the bids was disqualified and where the requirement that was not met is cited in documentation available to the vendor, i.e., RFP or Form 470.
There were no separate bids for this project from 2013. We renewed our contract with Charter for an additional 5 years (60 months)
 - (d) Please provide a copy of the Vendor Selection score sheet.
There were no separate bids for this project from 2013. We renewed our contract with Charter for an additional 5 years (60 months)
 - (e) It appears that the Charter Fiberlink contract which you provided is a copy of the contract renewal which is dated 1/29/2014 by the vendor, and supports \$9,138/month. Please provide a copy of the original contract which was signed in 2013, and documentation supporting the 5-year term of the contract – i.e. contract expiration date of 6/30/2018
The Charter signed agreement is signed and dated by the school district in 2013, but we did not receive a counter signed copy from Charter until 1/29/14. The document provided is the original signed document. In this same document on pg 4 is the documentation supporting the 5 year term of the contract.

8/22/2017

BEN 136937 – School District of the City of St. Charles – Selective Review Follow Up #1

Application #171037633, 171003802

III. City of St. Charles Missouri (Form 471 #171037633, FRNs 1799084275, 1799084299)

- (a) You have indicated in your response to the Selective Review Information Request that an Addendum to the RFP “City of St Charles School District Wide Area Network Improvement Project” was issued on 12/19/2016. Please provide a copy of this Addendum.
- (b) You have indicated that four bids were received from Unite Private Network, City of St. Charles, Fidelity Link and Charter. You provided copies of bids from Unite Private Network, City of St. Charles and Fidelity Link. Please provide a copy of the Charter bid.
- (c) The bid from the City of St. Charles refers to a “15-year lease schedule on page 11”. However, this was not included in the bid documents which you provided. Please provide a copy of the bid received from the City of St Charles with all referenced attachments.
The documents were re-scanned and the 15 year lease schedule should be visible now. The reference to page 11 can be ignored because page numbering is different than the verbiage.
- (d) You have indicated that four bids were received. Please provide a copy of the Vendor Selection Score Sheet.

Exhibit G
FCC Form 471 RAL Correction, dated April 4, 2013

FORM 471 RECEIPT ACKNOWLEDGMENT LETTER
(Funding Year 2013: 07/01/2013 - 06/30/2014)

March 22, 2013

Richard Senturia
SCHOOL DISTRICT OF THE CITY OF ST. CHARLES
9666 Olive Street Blvd
Suite 215
Olivette, MO 63132

Re: Form 471 Application Number: 928601
Funding Year 2013: 07/01/2013 - 06/30/2014
Applicant's Form Identifier: StCharsDM013-add-on
Billed Entity Number: 136937

Your certified FCC Form 471, "Services Ordered and Certification Form," requested \$110,656.00 in total Schools and Libraries Program (Program) pre-discount costs for services. A copy of this information has been provided to the service provider(s) whose Service Provider Identification Number(s) (SPIN) is featured on this Form 471.

USAC provides a separate Form 471 Receipt Acknowledgment Letter (RAL) with a RAL Funding Requests Report (Report) for each application certified within the application window. The Report summarizes the information provided to USAC. A space is provided for you to make allowable corrections to any clerical errors or errors that you realize may result in reduction or denial of funding. USAC will perform a complete analysis before funds are committed. If additional errors are found during our review we will attempt to contact you for clarification before making a decision that results in denials or reductions.

Review this Report to verify that the information accurately reflects your request. If the information is accurate, file this letter with your records.

DO NOT SEND CORRECTIONS TO THE CLIENT SERVICE BUREAU. To make corrections, please do the following:

- Corrections may be made until a Funding Commitment Decision Letter for this FCC Form 471 application is issued.
- If you would like to request a correction to a field that does not appear in the attached Report, print a copy of your FCC Form 471 and clearly note your requested correction.
- If contact information provided above is incorrect, note any correction above and submit a signed copy of this page as a correction.
- Indicate any corrections you wish to make in the Report in the spaces indicated.
- Sign where indicated, and provide your name, title, contact information and date.
- Submit a copy of your marked-up RAL to the email address, fax number or mailing address posted in the "Ministerial & Clerical Errors" page of our website.
- Retain a copy of the RAL and any submitted corrections.

REMINDERS REGARDING THE RAL

- This letter does NOT contain any decisions concerning your requests for discounts.
- Funding requests that did not pass Minimum Processing Standards are not included in the Report following this letter.
- See "Guide to USAC Letter Reports" posted in the Reference Area of our website for a description of each individual field in the following Report.

Form 471 928601 RAL Funding Requests Report

THIS REPORT DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS.

USE THIS REPORT TO LIST OR INDICATE CORRECTIONS YOU WISH TO MAKE TO YOUR FCC FORM 471.

Follow the guidance posted on the "Ministerial & Clerical Errors" page on our website to make allowable corrections. All corrections - including corrections to new fields - are subject to review for Program compliance and approval.

Corrections Submitted by:

Signature:

Richard Senturia

Date:

4-4-2013

Printed Name:

Richard Senturia

Title:

Consultant

Email, Fax Number or Phone Number:

rsenturia@erateprogram.com

Item

Data Entered on FCC Form 471

Make Corrections Here

1a. Name of Billed Entity

SCHOOL DISTRICT OF THE CITY OF ST. CHARLES

3. Billed Entity Number

136937

6. Contact Person's Name

Richard Senturia

6. Preferred mode of contact Email

6c. Contact Phone

314-282-3676

6d. Contact Fax

314-395-5882

6e. Email

rsenturia@erateprogram.com

6f. Holiday/vacation/summercontact information - if provided

Corrections Not Allowed

Corrections Not Allowed

Corrections Not Allowed

6g. Consultant Name

RICHARD A SENTURIA

Consultant Number

16048902

Consultant Employer

ERateProgram, LLC

The Billed Entity name, address, phone and fax numbers cannot be changed via the RAL correction process.

Form 471 928601 RAL Funding Requests Report

336087

IF YOU WISH TO CANCEL THIS FRN, PLEASE CHECK HERE _____

Item #	Data Entered on FCC Form 471	Make Corrections Here
11. Category of Service	Internet Access Telecommunications	
12. 470 App#	568560001042719	Service
13. SPIN	143005817 143004207	Rs
14. Service Provider Name	Charter Communications Charter MO	
15b. Contract Number	Control acct #8345786800000078	
16a. Billing Account Number		
16b. Multiple Billing Account Numbers	N	
18. Contract Award Date	03/14/2013	
19. Service Start Date	07/01/2013	
20a. Service End Date		
20b. Contract Expiration Date	06/30/2018	
22. Block 4 Entity or Worksheet No	1604349	
23a. Monthly Charges	\$9,138.00	
23b. Ineligible Monthly Amt	\$0.00	
23c. Eligible Monthly Amt	\$9,138.00	
23d. Number of months of service	12	
23e. Annual pre-discount Amount for eligible recurring charges	\$109,656.00	Calculated - Not Input
23f. Annual Non-Recurring (One-Time) Charges	\$1,000.00	
23g. Ineligible Non-Recurring Amt	\$0.00	
23h. Annual pre-discount amount for eligible non-recurring charges	\$1,000.00	Calculated - Not Input
23i. Total Pre-discount Amt	\$110,656.00	Calculated - Not Input
23j. Discount from Block 4	64	See Block 4 Above
23k. Funding Commitment Request	\$70,819.84	Calculated - Not Input
25f. Service provider assistance with funding	No	



www.eRateProgram.com

9666 Olive Blvd, Suite 215
St. Louis, MO 63132
314-282-3676
Fax: 314-395-5882

Fax

To: RAL Corrections

From: Richard Senturia

Fax: 1-973-599-6526

FAX # 1-314-395-5882

Phone:

Pages: 5

Re: RAL Corrections

Date: 4/4/13

Attached is the Form 471 928601 RAL. We made a ministerial error and used the wrong Charter SPIN and filed for internet access instead of telecommunications services.

I sent the email from Charter reporting our ministerial error.

Please contact me if you have further questions.

Thank you
Richard Senturia
314-282-3676

Cricky Cirillo

From: Pickens, Matthew R <Matthew.Pickens@chartercom.com>
Sent: Wednesday, April 03, 2013 2:17 PM
To: Cricky Cirillo
Subject: RE: School District of the City of St. Charles - RAL

Cricky,

I apologize I must have had the incorrect FRN #. The RFN on my spreadsheet is 2444197. Currently, it is listed as Internet Access and appears to be a WAN connection. I would recommend a SPIN change from 143005817 to 14324207.

Again, I am sorry for my error.

Thank you,

Matt Pickens



Matt Pickens | E-Rate Account Specialist CB | 314.288.3218
12405 Powerscourt Dr | St. Louis, MO 63131

From: Cricky Cirillo [<mailto:cricky@erateprogram.com>]
Sent: Wednesday, April 03, 2013 12:03 PM
To: Pickens, Matthew R
Subject: FW: School District of the City of St. Charles - RAL

Hello Matthew,

I cannot locate that FRN for School District of the City of St. Charles. I have FRN 2536087. Please let me know if that is the FRN that I need to change from internet SPIN 143005817 to telecom SPIN 143024207.

Thank you

Cricky Cirillo

eRateProgram, LLC.
A Private Consulting Company

cricky@erateprogram.com
www.eRateProgram.com

phone: (314) 282-3676
direct line: (314) 282-3675
fax: (314) 395-5882
9666 Olive Blvd, Ste 215
St. Louis, MO 63132

Sent from my HTC on the Now Network from Sprint!

----- Forwarded message -----

From: "Pickens, Matthew R" <Matthew.Pickens@chartercom.com>

Date: Tue, Apr 2, 2013 2:44 pm

Subject: School District of the City of St. Charles - RAL

To: "Richard Senturia" <rsenturia@erateprogram.com>

Hello Mr. Senturia,

When verifying the most recent RAL for the School District of the City of St. Charles, I noticed that FRN 4434000 appears to be for a WAN service but is listed as Internet Access along with an Internet SPIN. I believe that this needs to be updated to Telecom Service including the Charter Fiberlink-Missouri, LLC SPIN of 143024207.

Charter Communications will now use three Primary SPINs in Missouri.

Telephone/PRI:	143037016
WAN:	143024207
Internet:	143005817

<http://www.usac.org/sl/applicants/before-youre-done/spin-changes/corrective-changes.aspx>

Thank you,

Matt Pickens



Matt Pickens | E-Rate Account Specialist CB | 314.288.3218
12405 Powerscourt Dr | St. Louis, MO 63131

E-MAIL CONFIDENTIALITY NOTICE:

The contents of this e-mail message and any attachments are intended solely for the addressee(s) and may contain confidential and/or legally privileged information. If you are not the intended recipient of this message or if this message has been addressed to you in error, please immediately alert the sender by reply e-mail and then delete this message and any attachments. If you are not the intended recipient, you are notified that any use, dissemination, distribution, copying, or storage of this message or any attachment is strictly prohibited.

E-MAIL CONFIDENTIALITY NOTICE:

The contents of this e-mail message and any attachments are intended solely for the addressee(s) and may contain confidential and/or legally privileged information. If you are not the intended recipient of this message or if this message has been addressed to you in error, please immediately alert the sender by reply e-mail and then delete this message and any attachments. If you are not the intended recipient, you are notified that any use, dissemination, distribution, copying, or storage of this message or any attachment is strictly prohibited.

TRANSACTION REPORT

APR/04/2013/THU 02:13 PM

FAX(TX)

#	DATE	START T.	RECEIVER	COM.TIME	PAGE	TYPE/NOTE	FILE
	APR/04	02:11PM	19735996526	0:01:58	5	MEMORY OK	ECM 4150