



Office of the Chief Executive Officer

April 2, 2019

FCC

To Whom It May Concern,

We are writing this letter to request a waiver of the Form 471 application filing window deadline under the E-Rate program.

Catholic Charities of the Archdiocese of Newark (BEN # 230720) submitted its Form 471 application (#191037371) on time within the timeline of midnight March 27, 2019, but failed to certify it by the deadline. (See attached). The certification was completed in the morning on March 28, 2019. In the E-Rate Productivity Center online system, all items were completed except for the certification. We are hopeful that you will find that our Form 471 application is substantially in compliance and that this procedural violation not be held against us.

Catholic Charities of the Archdiocese of Newark is a small school district, and not a typical school district. Catholic Charities is primarily a non-profit social service organization that also has under its auspices three schools. As such, we do not have robust staff who handle the administration of federal grants like USAC on a regular basis. We have one staff person who has knowledge of USAC and the EPC system. Unfortunately, she needed to leave as her elderly mother was seriously ill and indeed brought to the hospital the following day for an infection. (Documentation available if needed.) In her rush to leave for her mother's home, due to an inadvertent error, the "certify" button was selected, but was not successfully received by the EPC system. This was not known to us until the following morning.

Further, we hope that the FCC take into consideration that granting this waiver will serve the public interest. Catholic Charities of the Archdiocese of Newark's three schools are all in urban settings, and for many years, our discount rate has been 90%. This calculation is based on the fact that over 90% of our students qualify for free/reduced lunch, which is a proxy for students living below the poverty level. One school serves special needs students such as those with severe behavioral and learning disabilities, including autism.

Catholic Charities has been a grateful participant in the E-Rate program for over 14 years. Internet access is used in all aspects of instruction in our schools. Failure to receive these funds to support access to the internet for these inner city children, including those with special needs, would create a hardship for our schools.

We are hopeful that you will consider our request for a waiver, and that in light of public interest, rigid adherence to the filing procedures will be waived.

Very truly yours,

John Westervelt, Chief Executive Officer

Supporting the Mission of the Archdiocese of Newark – Providing Help, Creating Hope



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname	CCAN 471 2019	Application Number	191037371
Funding Year	2019	Category of Service	Category 1

Billed Entity

CATHOLIC CHARITIES OF THE ARCHDIOCESE OF NEWARK
37 EVERGREEN PLACE EAST ORANGE NJ 07018
973-596-4050

Contact Information

Maria F Biancheri
973-596-3985
mbiancheri@ccannj.org

Billed Entity Number	230720
FCC Registration Number	0013537345
Applicant Type	School District

Holiday/Summer Contact Information SAME Maria F Biancheri Email - mbiancheri@ccannj.org Phone Number - 973-596-3985

Entity Information

School District Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	School District Attributes	Endowment
230720	CATHOLIC CHARITIES OF THE ARCHDIOCESE OF NEWARK	Urban				Public School District	None

Related Entity Information

Related Child School Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
219572	MOUNT CARMEL GUILD ACADEMY	Urban				None	Public School	None
14408980	THE LITTLE SCHOOLHOUSE FOR PRESCHOOL STUDENTS	Urban				None	Pre-K; Public School	None
14409000	MOUNT CARMEL GUILD CARES	Urban				None	Pre-K; Public School	None

Related Child School Entity - Discount Rate Calculation Details

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
219572	MOUNT CARMEL GUILD ACADEMY	Urban	91	N/A	
14408980	THE LITTLE SCHOOLHOUSE FOR PRESCHOOL STUDENTS	Urban	90	N/A	
14409000	MOUNT CARMEL GUILD CARES	Urban	120	N/A	

Discount Rate

School District Enrollment	School District NSLP Count	School District NSLP Percentage	School District Urban/Rural Status	Category One Discount Rate	Category Two Discount Rate
301	284	94.0%	Urban	90%	85%

Funding Request for FRN #1999067580

Funding Request Nickname: Internet Access

Service Type: Data Transmission and/or Internet Access

Agreement Information - Contract

Contract Number	CCH-001	Account Number	CH00289
Establishing FCC Form 470	190028145	Service Provider	Quick Copper Communications, LLC (SPN: 143032885)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	March 27, 2019	Based on a multiple award schedule?	No
How many bids were received for this contract?	2	Includes Voluntary Extensions?	No
What is the service start date?	July 01, 2019	Remaining Voluntary Extensions	
		Total Remaining Contract Length	
		What is the date your contract expires for the current term of the contract?	June 30, 2020

Pricing Confidentiality

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

Narrative

The services include MCG Academy 75Meg Fios with Static POTS linesFaxAlarm (5) Sip Lines (20) Fortinet Firewall 80D, Allworx Little Schoolhouse 75Meg Fios with Static POTS linesFaxAlarm (5) Sip Lines (6) Fortinet Firewall 80D, Allworx MCG Cares 100Meg Fiber Circuit POTS LinesFaxAlarm (5), Sip Lines (6), and Allworx. MCG Academy has a slightly lower enrollment right now - it is 74, with 51 children eligible for NSLP. Enrollment and eligibility at the other two schools remains the same.

Line Item # 1999067580.001

Product and Service Details

Purpose	Internet access service that includes a connection from any applicant site directly to the Internet Service Provider		
Function	Copper		
Type of Connection	T-1		
Bandwidth Speed			
Upload Speed	1.544 Mbps	Download Speed	1.544 Mbps

Connection Information

Does this include firewall services?	Yes	Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)?	Yes
Is this a direct connection to a single school, library or a NIF for Internet access?	No		

Cost Calculation for FRN Line Item # 1999067580.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$3,274.00	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$499.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$2,775.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$2,775.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$33,300.00	Total Eligible Recurring Costs	\$33,300.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$33,300.00

Recipients of Services

BEN	Name
219572	MOUNT CARMEL GUILD ACADEMY
14408980	THE LITTLE SCHOOLHOUSE FOR PRESCHOOL STUDENTS
14409000	MOUNT CARMEL GUILD CARES

FRN Calculation for FRN #1999067580

Monthly Charges	
Total Monthly Recurring Charges	\$3,274.00
Total Monthly Ineligible Charges	- \$499.00
Total Monthly Eligible Charges	= \$2,775.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$33,300.00

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

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$33,300.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$33,300.00
Discount Rate	90%
Funding Commitment Request	= \$29,970.00

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

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

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	\$33,300.00
Total funding commitment request amount on this FCC Form 471	\$29,970.00
Total applicant non-discount share of the eligible amount	\$3,330.00
Total budgeted amount allocated to resources not eligible for E-rate support	\$0.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$3,330.00
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share?	No

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

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

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

Authorized Person

Title:	Senior Grants Specialist	Name:	Maria F Biancheri
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Address:	590 North 7th Street Newark NJ 07107	Employer:	CATHOLIC CHARITIES OF THE ARCHDIOCESE OF NEWARK

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