

Conway School District

School Administrative Unit #9

Realizing the full potential of each and every student

176A Main Street, Conway, NH 03818

Phone 603-447-8368 Fax 603-447-8497

April 5, 2018

Letter: "Request for Waiver".

Federal Communication Commission

Office of the Secretary 445 12th Street, SW

Washington, DC 20554

Re: Waiver request of the Invoice/Bear Deadlines for Conway School District's Category 2, FRNs.
CC Docket No. 02-6

In re:

Billed Entity Number 121289

Applicant: Conway School District

Fund Year: 2017 FCC

Form 471: 171030097 for KHS-C2-BM-Filter-Palto Alto; FRN: 1799065055.

Form 471: 171028084 for CSD-(Elms)-C2-BM-WAPs-Areohive; FRN: 1799059942.

Form 471: 171030132 for CSD-(Elms)-C2-BM-Filter-Cyberoam; FRN: 1799065114.

Form 471: 171030120 for KMS-C2-BM-Filter-Cyberoam; FRN: 1799065084.

Form 471: 171030148 for KMS-C2-BM-HP Wireless Controller; FRN: 1799065146.

To Whom It May Concern:

The Conway School District certified their Funding year 2017 FCC Form 471 in the EPC portal of the Schools and Libraries Division of the Universal Service Administrative Company's (USAC) website on May 8, 2017.

The reason for this waiver is the persons who reviewed the BEAR Forms have denied funding for the eligible portions of these FRNs on Category 2 for Renewals and Software Supports of our WAPs, Switches, Wireless Controller and Filters. I need more time to re-submit the BEAR forms and provide acceptable supporting documentation and cost allocation request from USAC. Please refer to "Discussions" on following pages I had with USAC via the Customer Service Cases advising me to Appeal for that one or more of these FRNs should have been filed under Internal Connections instead of under Basic Maintenance of Internal Connections which I did not know or have proper knowledge of.

The Conway School District respectfully petitions the Commission to request a waiver of the Funding year 2017, FCC Form 471s, invoicing deadline due to my errors choosing wrong service. I have appealed to USAC # 92325 and will continue working with them to resolve issues and re-submit BEAR forms for these FRNs.

Sincerely,

Dana J. Pappalardo

Dana J. Pappalardo

Technology Aide & E-rate Administrator

d_pappalardo@sau9.org

603-447-4890

“Discussions”

Case #232551 - CSD-C2-BM-Aerohive_2017

UNFOLLOW THIS RECORD REOPEN CASE THIS FUNCTION ALLOWS YOU TO REOPEN A CASE.

Topic

FCC Form 472 - BEAR - Status Inquiry

Form Type

FCC Form 472

Form Number

2746308

Created By

USAC

Created On

3/30/2018 10:13 AM EDT

Organization

CONWAY SCHOOL DISTRICT

Description

Invoice was rejected and Dana is requesting more information on why since it appears as approved on the 471.

USAC

Dana,

Per USAC, Aerohive Networks Inc.: HiveManager 6 Online Subscription are eligible under Internal Connections.

Any decision made by USAC or the Schools and Libraries Program regarding eligibility, funding, or payment recovery, can be appealed by the impacted party.

USAC must receive a complete appeal within 60 days of the issuance of the decision by USAC; e.g., a FCDL must be appealed within 60 days of the date of the FCDL. To allow sufficient time for review, USAC encourages impacted parties to submit appeals as soon as possible following USAC's decision. Failure to provide all required documentation within 60 days of USAC's decision will result in dismissal of the appeal. See 47 C.F.R. Section 54.719-54.725 for the FCC's rules on filing an appeal.

Additional information about appeals appears on the following page on the Schools and Libraries website:
<http://www.usac.org/sl/about/program-integrity/appeals.aspx>

There are three paths to beginning an appeal in EPC:

1. You can reach it from the Landing Page. Click Appeal in the list of options at the top right, or
2. You can reach it from the top-right drop-down menu on the Entity Summary Page. Click Create Appeal, or
3. You can reach it from the Related Actions section of the Entity Summary Page. Click Create Appeal.

4/3/2018 8:07 AM EDT

Dana Pappalardo

Hello,

If I made a mistake on the Form 471 and will appeal if needed but last year these were approved and refunded by USAC under Basic Maintenance.

I have a questions as to how Aerohive's HiveManager 6 Online renewals / subscriptions and software updates not be a basic maintenance and be under internal connections?

Internal connections on the Form 471 gives you pull down menu for Components such as WAPs, Switches, etc...

There is nothing for the renewal software's under internal connections or I missed it.

Please help.

4/2/2018 8:42 AM EDT

USAC

Dana,

FRN 1799059942 was approved for Basic Maintenance of Internal Connections. It was determined that the Product/Services being invoiced: Aerohive Networks Inc.: HiveManager 6 Online Subscription is NOT eligible under this Type of Service. It is eligible under Internal Connections. If an error was made in filing for the Type of Service the Applicant will need to file an Appeal.

4/2/2018 8:02 AM EDT

Case Contact

Dana Pappalardo

Case #232081 - KMS-C2-BM-Filter-Cyberoam_2017

FOLLOW THIS RECORD TO SEE NEWS RELATED TO IT IN YOUR NEWS FEEDREOPEN CASETHIS FUNCTION ALLOWS YOU TO REOPEN A CASE.

Topic

FCC Form 472 - BEAR - Status Inquiry

Form Type

FCC Form 472

Form Number

2746296

Created By

USAC

Created On

3/26/2018 3:21 PM EDT

Organization

CONWAY SCHOOL DISTRICT

Description

Requesting additional information on Invoice# 2746296, FRN 1799065084

Case Artifacts Hide section contents

Documents

KMS #16046771 E-RATE 2017_KMS-C2-BM-Filter-Cyberoam_Breakdown_3-28-18

USAC

Dana,

You should be as clear and specific as possible, then re-file your invoice to USAC. If your reviewer has further questions about the cost allocation during review of your invoice, they will reach out to you.

If you have any additional questions or concerns, you may reopen the case and add a note. If the case cannot be reopened, please create a new customer service case or contact the Client Service Bureau at 888-203-8100.

3/28/2018 3:14 PM EDT

Dana Pappalardo

Hi Again and thank you.

Just a few questions please.

Talked with Service Provider about doing breakout and it cost more to do per items separate.

But will try to do a clear showing somehow, working with vendor now. See attachment does this work?

3/28/2018 2:20 PM EDT

USAC

Dana,

Unfortunately, since the bill from the Service Provider does not break up the service into each individual part, there is no way for USAC to determine how much of it is eligible. A cost allocation requires a clear delineation between the eligible and ineligible components. Unless there can be a clear delineation between eligible and ineligible components, you will not be able to receive funding.

If you have any additional questions or concerns, you may reopen the case and add a note. If the case cannot be reopened, please create a new customer service case or contact the Client Service Bureau at 888-203-8100.

3/28/2018 1:26 PM EDT

Dana Pappalardo

Hi Again and thank you,

Ok, now we are getting somewhere, so I see what is eligible now how do I submit?

We purchased and paid for the total value subscription but how do I submit

For the eligible parts?

On the billed invoice it states the total valued subscription that was denied first time but want to submit for eligible parts. There is no sku numbers available to break down eligible parts per my service provider, too hard to do.

I thought we did a cost allocation for basic maintenance but was denied second time.

What document do you need and what or how *do* I submit for eligible parts of filter?

Thank you

3/28/2018 12:56 PM EDT

USAC

Dana,

Ineligible Services that you have listed are:

- Anti-virus software
- Anti-Denial-of-Service Attack Software
- Content Filtering
- URL filtering

Eligible Services you have listed are:

- Basic technical support including online and telephone based technical support - Basic Maintenance of Internal Connections
- Software upgrades and patches including bug fixes and security patches - Basic Maintenance of Internal Connections
- Repair and upkeep of eligible hardware - Basic Maintenance of Internal Connections
- Warranty - Internal Connections

If you have any additional questions or concerns, you may reopen the case and add a note. If the case cannot be reopened, please create a new customer service case or contact the Client Service Bureau at 888-203-8100.