

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

In the Matter of)	
)	WC Docket No. 02-60
Request for Review and/or Waiver by)	
Southside Community Services Board)	
of Funding Decisions by the)	
Universal Service Administrative Company)	

**REQUEST FOR REVIEW AND/OR WAIVER
BY SOUTHSIDE COMMUNITY SERVICES BOARD
OF FUNDING DECISIONS BY THE
UNIVERSAL SERVICE ADMINISTRATIVE COMPANY**

Pursuant to sections 54.719 and 54.722 of the Commission's rules,¹ Southside Community Services Board² (Southside) hereby respectfully requests a review of a Universal Service Administrative Company (USAC) decision to deny Funding Year (FY) 2016 applications³ submitted by Southside under the Rural Health Care ("RHC") Telecommunications Program.⁴

Southside believes this appeal is simply the result of a misunderstanding. USAC denied Southside's four requests for funding because it found that Southside did not provide sufficient documentation to demonstrate that it complied with the Commission's competitive bidding rules. To the contrary, Southside complied with the Commission's competitive bidding process. For its

¹ 47 C.F.R. §§ 54.719(b), (c); *id.* § 54.722(a).

² HCP Numbers 28296, 30947, 38311, and 38319.

³ Funding Request Numbers 1688066, 1688063, 1688069, 1688068, 1694413, 1694411, 1694417, and 1694415. *See also* Exhibit 1 for the FRNs at issue.

⁴ Exhibit 2, *e.g.*, email from Rural Health Care Division, USAC, to Southside Community Services Board, October 10, 2016 (USAC October 2016 Denial); Exhibit 3, *e.g.*, email from Rural Health Care Division, USAC, to Southside Community Services Board, December 6, 2016 (USAC December 2016 Denial). We have only provided one example of each denial because the remaining emails are the same for each set of FRNs.

FY 2016 applications, however, Southside accidentally provided to USAC a copy of the undated bid evaluation matrix from FY 2014 competitive bidding processes instead of the one bid it received in response to its FY 2016 competitive bidding processes. Southside tried to tell USAC multiple times that it had made a mistake, but USAC did not understand Southside's attempted clarifications. Ultimately, USAC denied Southside's funding requests because Southside did not provide the one FY 2016 bid, even though Southside did not realize USAC was seeking a copy of the bid until it received USAC's denial of its appeal. Southside herein provides a copy of the one bid it received in FY 2016 and urges the Commission to direct USAC to accept it as the requested documentation of the competitive bidding process.

Therefore, Southside respectfully requests that the Commission reverse USAC's finding and remand the applications to USAC for further review. If the Commission nevertheless believes there has been a violation of Commission rules, Southside respectfully requests a waiver of those rules to the extent necessary to grant the requested relief.

I. BACKGROUND

Established in 1972 as a public, non-profit organization, the Southside Community Services Board (Southside) provides behavior health, intellectual/developmental disability and substance abuse services to the residents of Southside Virginia in Halifax, Mecklenburg, and Brunswick Counties. All Southside programs and services are licensed by the Virginia Department of Behavioral Health and Developmental Services. Funding for the many services provided through Southside comes from local, state, and federal governments and consumer fees. Southside services are provided at program sites or at the individual's or family's residence located throughout the three-county catchment area.

On March 18, 2016, Southside submitted three FCC Forms 465 for Funding Year 2016 that requested service and initiated a competitive bidding process.⁵ On April 6, 2016, Southside submitted a Form 465 also requesting an additional telecommunication circuit for Funding Year 2016.⁶ After the competitive bidding process, Southside selected TeleQuality Communications, Inc. (TeleQuality), a non-dominant competitive telecommunications carrier, as its service provider. Southside proceeded to file its FCC Forms 466 on August 31, 2016. As supporting documentation for the FCC Forms 466, Southside also accidentally submitted copies of its undated bid evaluation matrix from funding year 2014.⁷

⁵ Exhibit 4, FY 2016 FCC Form 465 No. 43161941 (filed March 18, 2016); FY 2016 FCC Form 465 No. 43161942 (filed March 18, 2016); FY 2016 FCC Form 465 No. 43161943 (filed March 18, 2016).

⁶ Exhibit 5, FY 2016 FCC Form 465 No. 43162477 (filed April 6, 2016).

⁷ Exhibit 6, Southside Community Services Board, Bid Evaluation Matrix. However, as noted below, the bid evaluation matrix was from funding year 2014, even though it was not dated. The bid evaluation matrix from Funding Year 2014 provided scores for three service providers: TeleQuality (dba RHT), GCR Telecommunications, Inc., and Network Services Solutions, LLC. These three service providers submitted bids in 2014, but TeleQuality was the only bidding service provider in Funding Year 2016. *See* Exhibit 7, Letter from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, to Rural Health Care Division, USAC, dated Dec. 8, submitted Dec. 9, 2016 (Southside Appeal).

On September 30, 2016, Southside received a request for information from USAC.⁸ USAC asked Southside to provide copies of the bids it received in response to its Forms 465, as well as copies of any other documentation related to the competitive bidding process.⁹ Southside responded that TeleQuality was the only bidding service provider.¹⁰ On October 6, 2016, USAC sent a follow-up request for information seeking copies of Southside's competitive bidding documentation.¹¹ In response, Southside reiterated that TeleQuality was the only bidding service provider. Additionally, Southside noted that it had inadvertently submitted a FY 2014 bid evaluation matrix with its FCC Forms 466.¹² The bid evaluation matrix from 2014 provided scores for three service providers: TeleQuality, GCR Telecommunications, Inc., and Network Services Solutions, LLC. However, Southside explained that TeleQuality was the only bidding service provider in Funding Year 2016.¹³

On October 10, 2016, USAC denied Southside's funding requests for support under the RHC Telecommunications Program (Telecom Program) for Funding Year 2016.¹⁴ In the denial,

⁸ Exhibit 8, *e.g.*, email from Rural Health Care Division, USAC, to Southside Community Services Board, September 30, 2016 (USAC Sept. 30 Request for Information). The actual information request is in Exhibit 9, along with the response. All of the requests to Southside were the same, so we have provided only one example.

⁹ *Id.*

¹⁰ Exhibit 9, responses from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, to Rural Health Care Division, USAC, October 6, 2016 in USAC Portal (Southside Oct. 6 Initial Response).

¹¹ Exhibit 10, *e.g.*, email from Rural Health Care Division, USAC, to Southside Community Services Board, October 6, 2016 (USAC Oct. 6 Request for Information). The actual information request is in Exhibit 11, along with the response. All of the requests to Southside were the same, so we have provided only one example.

¹² Exhibit 11, responses from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, to Rural Health Care Division, USAC, October 6, 2016, in USAC's portal (Southside Oct. 6 Second Response).

¹³ Exhibit 7, Southside Appeal. Southside had repeatedly asked USAC to disregard the 2014 competitive bidding documents it had inadvertently submitted with its 2016 funding requests. *Id.* TeleQuality submitted a bid on April 29, 2016. Exhibit 12, TeleQuality bid response.

USAC found Southside did not submit copies of the bids received in response to Southside's request for services and concluded that Southside did not comply with the competitive bidding rules.¹⁵

On November 4, 2016, Southside tried again to seek funding for FY 2016 for the same four circuits by filing four new FCC Forms 466.¹⁶ Southside thought that if it filed the Forms 466 again—this time omitting the incorrect FY 2014 competitive bidding matrix—it would eliminate the confusion regarding the competitive bidding process. On December 6, 2016, however, USAC issued a denial of Southside's new funding requests for support.¹⁷ USAC found that because Southside's new funding requests involved the same services, at the same location, and were supported by the same documentation, these funding requests were duplicates of the funding requests USAC previously denied.¹⁸ USAC also noted that, for the new funding requests, Southside's FCC Forms 466 indicated that Southside did not receive any bids associated with the FCC Forms 465 while Southside had previously said it did receive bids.¹⁹ For these reasons, USAC denied the new funding requests.²⁰

On December 9, 2016, Southside filed an appeal requesting USAC to reverse its funding decisions for FY 2016 for both sets of funding requests.²¹ More than two years later—on March

¹⁴ Exhibit 2, USAC October 2016 Denial.

¹⁵ *Id.*

¹⁶ *See* Exhibit 1 for the FRNs at issue.

¹⁷ Exhibit 3, USAC December 2016 Denial. Additionally, USAC found that the FRNs for the new funding requests were associated with the same FCC Forms 465 and the same competitive bidding processes as the previously denied funding requests. *Id.*

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.*

²¹ Southside appealed the USAC denials issued on October 10, 2016, and December 6, 2016. Exhibit 7, Southside Appeal to USAC. The HCPs at issue in the appeal are: HCP Number 28296, Southside

15, 2019—USAC issued a denial of Southside’s appeal finding Southside “did not provide sufficient documentation to demonstrate that it complied with the FCC’s competitive bidding rules.”²² Specifically, USAC found Southside did not submit copies of the bids it received in response to the FY 2016 request for services.²³

Appeals of USAC decisions are due within 60 days.²⁴ As such, this appeal is timely filed.

II. USAC SHOULD REVERSE ITS DENIAL BECAUSE SOUTHSIDE DID NOT VIOLATE THE COMPETITIVE BIDDING PROCESS

As described above, USAC found that Southside did not provide sufficient documentation to demonstrate that it complied with the Commission’s competitive bidding rules. To the contrary, Southside adhered to and followed the Commission’s competitive bidding rules. Any documentation errors concerning Southside’s funding requests are the result of a miscommunication between USAC and Southside.

The Commission’s competitive bidding process requires eligible health care providers (HCPs) to complete and post an FCC Form 465, wait at least 28 days before selecting a service provider, and then submit an FCC Form 466 certifying that the services selected are the most cost-effective.²⁵ As required by Commission rules, Southside completed and submitted its FCC Forms 465 requesting service for Funding Year 2016 and initiating a 28-day competitive bidding process. In response to its request for services, Southside received one bid from TeleQuality.²⁶

Community Services Board; HCP Number 30947, Southside Community Services Board, HCP Number 38311, Southside Community Services Board – HDTC/CSP South Boston; HCP Number 38319, Southside Community Services Board – MCSP South Hill.

²² Exhibit 13, USAC Appeal Denial at 1.

²³ *Id.*

²⁴ 47 C.F.R. §§ 54.719(b), 54.720(a).

²⁵ 47 C.F.R. § 54.603 (Commission’s competitive bidding and certification requirements); *see also* 47 C.F.R. § 54.615(a), (c)(7); Form 466 Instructions, Rural Health Care Universal Service Mechanism, OMB 3060-0804, at 1-2 (FCC Form 466 Instructions).

After completion of the 28-day waiting period, Southside selected TeleQuality as its service provider and signed contracts in June 2016 and submitted its FCC Forms 466 in August 2016.

Southside's only error was that it mistakenly provided its FY 2014 bid evaluation matrix to USAC. As a result, USAC mistakenly believed Southside had received multiple bids for Funding Year 2016 when, in fact, Southside received only one bid. After realizing its mistake, Southside asked USAC to disregard the FY 2014 competitive bidding documentation.²⁷ USAC's second request for information, again, incorrectly stated that Southside had received multiple bids and asked Southside to submit copies of those bids. Southside's second response explained that it had received only one bid from TeleQuality in FY 2016.²⁸

At worst, this case involved miscommunication between USAC and Southside concerning the number of bids Southside received in Funding Year 2016. USAC's requests for information incorrectly asserted that Southside had received multiple bids and asked for copies of those bids.²⁹ Southside made a good faith effort to clarify that it had inadvertently submitted supporting documentation from the wrong funding year, which indicated Southside had received multiple bids, and to explain that it received only one bid in FY 2016. Southside would have provided the one FY 2016 bid it received had it realized that is what USAC was seeking and it has provided it to the Commission with this appeal.

III. IN THE ALTERNATIVE, A WAIVER OF THE COMMISSION'S RULES IS IN THE PUBLIC INTEREST

As explained above, Southside complied with the competitive bidding process. In addition, Southside has now provided documentation with this appeal showing that TeleQuality

²⁶ Exhibit 9, Southside Oct. 6 Initial Response.

²⁷ *Id.*

²⁸ Exhibit 11, Southside Oct. 6 Second Response.

²⁹ Exhibit 8, USAC Sept. 30 Request for Information; Exhibit 10, USAC Oct. 6 Request for Information.

submitted a bid in Funding Year 2016 and this was the only bid Southside received in response to its request for services. If the Commission believes Southside did not meet a program rule, however, Southside respectfully requests a waiver of the Commission's rules to the extent necessary to grant the requested relief.

Any of the Commission's rules may be waived if good cause is shown.³⁰ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.³¹ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.³²

A waiver in this case would be in the public interest. The budgetary ramifications of Southside being denied appropriate and proper funding would be devastating to this non-profit health care provider. The loss of RHC program funding could force Southside to make difficult choices that would have an adverse impact on the individuals and rural communities that rely upon the health care services it provides.

It is not in the public interest to deny funding for telecommunications services needed due to miscommunication and a documentation error, as in this case. This is especially true when the issue is not a substantive violation, but a procedural one. Additionally, a waiver would further the goals of the Rural Health Care program without undermining the purpose of the Commission's rules and would thus be in the public interest. As explained above, Southside complied with the competitive bidding process. Southside posted its FCC Form 465, waited 28 days before selecting a service provider, and submitted its FCC Form 466 certifying that it had

³⁰ 47 C.F.R. § 1.3.

³¹ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).


³² *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

selected the most cost-effective services. There was no fraud, bad faith, or negligence on the part of Southside. It does not further the goals of the RHC program to deny these funds. A documentation error should not result in the denial of all funding for an entire year for all of Southside's funding requests.

IV. CONCLUSION

For the reasons discussed above, Southside respectfully asks the Commission to grant this appeal and reverse USAC's denials, or, in the alternative, to waive the Commission's rules to the extent necessary to grant the requested relief. Southside notes that, because it refiled its funding requests in FY 2016 to try to correct the issue, it is only seeking funding for either the FRNs submitted in August or November, but not both.

Respectfully submitted,


Kenneth R. Schwartz
Director of Information Services & Quality
Southside Community Services Board
P.O. Box 1478
143 Industrial Parkway
Clarksville, VA 23927
kschwartz@sscsb.org
(434) 572-6916

May 9, 2019

List of Exhibits

- Exhibit 1 List of FRNs
- Exhibit 2 Email from Rural Health Care Division, USAC, to Southside Community Services Board, October 10, 2016 (USAC October 2016 Denial)
- Exhibit 3 Email from Rural Health Care Division, USAC, to Southside Community Services Board, December 6, 2016 (USAC December 2016 Denial)
- Exhibit 4 FY 2016 FCC Form 465 No. 43161941 (filed March 18, 2016); FY 2016 FCC Form 465 No. 43161942 (filed March 18, 2016); FY 2016 FCC Form 465 No. 43161943 (filed March 18, 2016)
- Exhibit 5 FY 2016 FCC Form 465 No. 43162477 (filed April 6, 2016)
- Exhibit 6 Southside Community Services Board, Bid Evaluation Matrix for FY 2014
- Exhibit 7 Letter from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, to Rural Health Care Division, USAC, Dec. 9, 2016 (Southside Appeal)
- Exhibit 8 Email from Rural Health Care Division, USAC, to Southside Community Services Board, September 30, 2016 (USAC Sept. 30 Request for Information)
- Exhibit 9 Response from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, to Rural Health Care Division, USAC, October 6, 2016 in USAC Portal (Southside Oct. 6 Initial Response)
- Exhibit 10 Email from Rural Health Care Division, USAC, to Southside Community Services Board, October 6, 2016 (USAC Oct. 6 Request for Information)
- Exhibit 11 Response from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, to Rural Health Care Division, USAC, October 6, 2016 in the USAC Portal (Southside Oct. 6 Second Response)
- Exhibit 12 TeleQuality bid response
- Exhibit 13 Letter from USAC to Betty Rose, Southside Community Services Board, Administrator's Decision on Rural Health Care Program Appeal, March 15, 2019, at 1 (USAC Appeal Denial)

EXHIBIT 1

Southside Community Services Board FY 2016 FRNs Filed on August 31, 2016

HCP Number	HCP Name	FRN	Form 465 Application Number
28296	Southside Community Services Board	1688066	43161941
30947	Southside Community Services Board	1688063	43162477
38311	Southside Community Services Board – HDTC/CSP South Boston	1688069	43161942
38319	Southside Community Services Board – MCSP South Hill	1688068	43161943

Southside Community Services Board FY 2016 FRNs Filed on November 4, 2016

HCP Number	HCP Name	FRN	Form 465 Application Number
28296	Southside Community Services Board	1694413	43161941
30947	Southside Community Services Board	1694411	43162477
38311	Southside Community Services Board – HDTC/CSP South Boston	1694417	43161942
38319	Southside Community Services Board – MCSP South Hill	1694415	43161943

EXHIBIT 2



Rose, Betty <brose@sscsb.org>

RHC Telecommunications Program - FCC Form 466 - Denial Notice - HCP # 28296

3 messages

rhc-assist@usac.org <rhc-assist@usac.org>

Mon, Oct 10, 2016 at 4:20 PM

To: brose@sscsb.org, funding@telequality.com, kschwartzsscsb@gmail.com, kschwartz@sscsb.org

Date: 10-Oct-2016
Program: Telecommunications Program
Funding Year: 2016
Health Care Provider (HCP) Name: Southside Community Services Board
HCP Number: 28296
Funding Request Number (FRN): 1688066
FCC Form 465 Application Number: 43161941

The Universal Service Administrative Company (USAC)'s Rural Health Care (RHC) Program reviewed the FCC Form 466 (Funding Request and Certification Form) and supporting documentation submitted by the HCP referenced above. Based on the information provided, USAC is unable to provide support for the following reason(s):

1. The HCP did not provide paper copies of the offers or bids received in response to the posted FCC Form 465. See 47 C.F.R Section 54.603(b)(4).
2. The HCP has violated the Telecommunication's Program competitive bidding rules. See 47 C.F.R. Section 54.603.

Service Provider Name: TeleQuality Communications, Inc.
Service Provider Identification Number (SPIN): 143031579

Next Steps

To appeal this decision, deliver a letter of appeal to USAC within 60 days of the date of this letter. Detailed instructions for filing appeals are available at: <http://www.usac.org/about/about/program-integrity/appeals.aspx>.

For More Information

Please do not reply directly to this email, as emails to this account will not be delivered to the RHC Program team. For questions or assistance, contact the Rural Health Care Program Help Desk at (800) 453-1546 or by email at rhc-assist@usac.org.

For more information about the Telecommunications Program application process, refer to the Telecom Program Getting Started web page at <http://www.usac.org/rhc/telecommunications/getting-started/>.

For more information about the FCC Form 466, visit the Telecommunications Program Forms web page at <http://www.usac.org/rhc/telecommunications/tools/forms/>.

The HCP mailing contact, all account holders related to this circuit, the contact at the HCP's physical location have been copied on this email. In addition, a copy of this letter has been sent to the entity identified below as your selected telecommunications carrier.

EXHIBIT 3



Rose, Betty <brose@sscsb.org>

RHC Telecommunications Program - FCC Form 466 - Denial Notice - HCP # 28296

2 messages

rhc-assist@usac.org <rhc-assist@usac.org>

Tue, Dec 6, 2016 at 9:00 AM

To: brose@sscsb.org, funding@telequality.com, kschwartzsscsb@gmail.com, kschwartz@sscsb.org

Date: 06-Dec-2016
Program: Telecommunications Program
Funding Year: 2016
Health Care Provider (HCP) Name: Southside Community Services Board
HCP Number: 28296
Funding Request Number (FRN): 1694413
FCC Form 465 Application Number: 43161941

The Universal Service Administrative Company (USAC)'s Rural Health Care (RHC) Program reviewed the FCC Form 466 (Funding Request and Certification Form) and supporting documentation submitted by the HCP referenced above. Based on the information provided, USAC is unable to provide support for the following reason(s):

1. The HCP has violated the Telecommunication's Program competitive bidding rules. See 47 C.F.R. Section 54.603.

Service Provider Name: TeleQuality Communications, Inc.
Service Provider Identification Number (SPIN): 143031579

Next Steps

To appeal this decision, deliver a letter of appeal to USAC within 60 days of the date of this letter. Detailed instructions for filing appeals are available at: <http://www.usac.org/about/about/program-integrity/appeals.aspx>.

For More Information

Please do not reply directly to this email, as emails to this account will not be delivered to the RHC Program team. For questions or assistance, contact the Rural Health Care Program Help Desk at (800) 453-1546 or by email at rhc-assist@usac.org.

For more information about the Telecommunications Program application process, refer to the Telecom Program Getting Started web page at <http://www.usac.org/rhc/telecommunications/process-overview/default.aspx/>.

For more information about the FCC Form 466, visit the Telecommunications Program Forms web page at <http://www.usac.org/rhc/telecommunications/tools/forms/>.

The HCP mailing contact, all account holders related to this circuit, the contact at the HCP's physical location have been copied on this email. In addition, a copy of this letter has been sent to the entity identified below as your selected telecommunications carrier.

EXHIBIT 4

Health Care Providers Universal Service
Description of Services Requested & Certification Form

Estimated time per response: 1 hour

Read instructions thoroughly before completing this form. Failure to comply may cause delayed or denied funding.

Form 465 Application Number (assigned by RHCD) 43161941

Block 1: HCP Location InformationInformation required in this block applies to the **physical location** of the HCP. Do not enter a "PO Box" or "Rural Route" address.

1 HCP Number 28296	2 Consortium Name	
3 HCP Name Southside Community Services Board	4 HCP FCC Registration Number (FCC RN) 0021625215	
5 Contact Name Kenneth R Schwartz		
6 Address Line 1 450 Washington Street		
7 Address Line 2	8 County Mecklenburg	
9 City Boydton	10 State VA	11 ZIP Code 23917
12 Phone # (434) 572-1565 1565	13 Fax # (434) 374-3221	14 E-mail kschwartzsscsb@gmail.com

Block 2: HCP Mailing Contact Information

15 Is the HCP's mailing address (where correspondence should be sent) different from its physical location described in Block 1?		<input checked="" type="checkbox"/> Yes, complete Block 2
		<input type="checkbox"/> No, go to Block 3.
16 Contact Name Kenneth R Schwartz		17 Organization Southside Community Services Board
18 Address Line 1 PO Box 1478		
19 Address Line 2		
20 City Clarksville	21 State VA	22 ZIP Code 23927
23 Phone # (434) 572-1565 1565	24 Fax # (434) 374-3221	25 E-mail kschwartz@sscsb.org

Block 3: Funding Year Information

26 Funding Year (Check only one box)		
<input checked="" type="checkbox"/> Year 2016 (7/1/2016-6/30/2017)	<input type="checkbox"/> Year 2017 (7/1/2017-6/30/2018)	<input type="checkbox"/> Year 2018 (7/1/2018-6/30/2019)

Block 4: Eligibility

27 Only the following types of HCPs are eligible. Indicate which category describes the applicant. (Check only one.)	
<input type="checkbox"/> Post-secondary educational institution offering health care instruction, teaching hospital or medical school	<input type="checkbox"/> Rural health clinic
<input type="checkbox"/> Community health center or health center providing health care to migrants	<input type="checkbox"/> Consortium of the above
<input type="checkbox"/> Local health department or agency	<input type="checkbox"/> Dedicated ER of rural, for-profit hospital
<input checked="" type="checkbox"/> Community mental health center	<input type="checkbox"/> Part-time eligible entity
<input type="checkbox"/> Not-for-profit hospital	

28 If consortium, dedicated emergency department, or part-time eligible entity was selected in Line 27, please describe the entity.

29 Please describe the eligible health care provider's telecommunications and/or Internet service needs, so that service providers may bid to provide the services. The description should describe whether video or store and forward consultations will be used, whether large image files or X-rays will be transmitted, the quality of connection needed, or other relevant considerations. Services required to support tele-medicine services, support access use and maintenance EHR, patient portals and data transfers.

Block 5: Request for Services

30 Is the HCP requesting reduced rates for:		
<input type="checkbox"/> Both Telecommunications & Internet Services	<input checked="" type="checkbox"/> Telecommunications Service ONLY	<input type="checkbox"/> Internet Service ONLY

Block 6: Certification

31 ☒ I certify that I am authorized to submit this request on behalf of the above-named entity or entities, that I have examined this request, and that to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

32 ☒ I certify that the health care provider has followed any applicable State or local procurement rules.

33 ☒ I certify that the telecommunications services and/or Internet access charges that the HCP receives at reduced rates as a result of the HCPs' participation in this program, pursuant to 47 U.S.C. Sec. 254 as implemented by the Federal Communications Commission, will be used solely for purposes reasonably related to the provision of health care service or instruction that the HCP is legally authorized to provide under the law of the state in which the services are provided and will not be sold, resold, or transferred in consideration for money or any other thing of value.

34 ☒ I certify that the health care provider is a non-profit or public entity.

35 ☒ I certify that the health care provider is located in a rural area. Visit the RHCD website: (<http://www.usac.org/rhc/tools/rhcd/Rural/2005/search.asp>) or contact RHCD at 1-800-229-5476 for a listing of rural areas.

36 ☒ Pursuant to 47 C.F.R. Secs. 54.601 and 54.603, I certify that the HCP or consortium that I am representing satisfies all of the requirements herein and will abide by all of the relevant requirements, including all applicable FCC rules, with respect to funding provided under 47 U.S.C. Sec. 254.

37 Signature Electronically signed

38 Date 18-Mar-2016

39 Printed name of authorized person
Kenneth Schwartz

40 Title or position of authorized person
Director of Information Services & Quality

41 Employer of authorized person
Southside Community Services Board

42 Employer's FCC RN
0021625215

Please remember:

- Form 465 is the **first** step a health care provider must take in order to receive the benefit of reduced rates resulting from participation in this universal service support program.
- After the HCP submits a complete and accurate Form 465, the RHCD will post it on the RHCD web site for 28 days.
- HCPs may not enter into agreements to purchase eligible services from service providers before the **28 days expire**.
- After the HCP selects a service provider, the HCP must initiate the **next** step in the application process, the filing of Form 466 and/or 466A.

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 3 of the Commission's Rules authorize the FCC to request the information on this form. The purpose of the information is to determine your eligibility for certification as a health care provider. The information will be used by the Universal Service Administrative Company and/or the staff of the Federal Communications Commission, to evaluate this form, to provide information for enforcement and rulemaking proceedings and to maintain a current inventory of applicants, health care providers, billed entities, and service providers. No authorization can be granted unless all information requested is provided. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Act Project (3060-0804), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to pra@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0804.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

This form should be submitted to:

Rural Health Care Division
30 Lanidex Plaza West, P.O.Box 685
Parsippany NJ 07054-0685

Health Care Providers Universal Service
Description of Services Requested & Certification Form

Estimated time per response: 1 hour

Read instructions thoroughly before completing this form. Failure to comply may cause delayed or denied funding.

Form 465 Application Number (assigned by RHCD) 43161942

Block 1: HCP Location InformationInformation required in this block applies to the **physical location** of the HCP. Do not enter a "PO Box" or "Rural Route" address.

1 HCP Number 38311	2 Consortium Name	
3 HCP Name Southside Community Services Board - HDTC/CSP South Boston	4 HCP FCC Registration Number (FCC RN) 0021625215	
5 Contact Name Kenneth R Schwartz		
6 Address Line 1 3030 Philpott Rd.		
7 Address Line 2	8 County Halifax	
9 City South Boston	10 State VA	11 ZIP Code 24592
12 Phone # 4345726916 1565	13 Fax # (434) 374-3221	14 E-mail kschwartz@sscsb.org

Block 2: HCP Mailing Contact Information

15 Is the HCP's mailing address (where correspondence should be sent) different from its physical location described in Block 1?		<input checked="" type="checkbox"/> Yes, complete Block 2
		<input type="checkbox"/> No, go to Block 3.
16 Contact Name Kenneth R Schwartz		17 Organization Southside Community Services Board
18 Address Line 1 P.O. Box 1478		
19 Address Line 2		
20 City Clarksville	21 State VA	22 ZIP Code 23927
23 Phone # 4345726916 1565	24 Fax # (434) 374-3221	25 E-mail kschwartz@sscsb.org

Block 3: Funding Year Information

26 Funding Year (Check only one box)		
<input checked="" type="checkbox"/> Year 2016 (7/1/2016-6/30/2017)	<input type="checkbox"/> Year 2017 (7/1/2017-6/30/2018)	<input type="checkbox"/> Year 2018 (7/1/2018-6/30/2019)

Block 4: Eligibility

27 Only the following types of HCPs are eligible. Indicate which category describes the applicant. (Check only one.)	
<input type="checkbox"/> Post-secondary educational institution offering health care instruction, teaching hospital or medical school	<input type="checkbox"/> Rural health clinic
<input type="checkbox"/> Community health center or health center providing health care to migrants	<input type="checkbox"/> Consortium of the above
<input type="checkbox"/> Local health department or agency	<input type="checkbox"/> Dedicated ER of rural, for-profit hospital
<input checked="" type="checkbox"/> Community mental health center	<input type="checkbox"/> Part-time eligible entity
<input type="checkbox"/> Not-for-profit hospital	

28 If consortium, dedicated emergency department, or part-time eligible entity was selected in Line 27, please describe the entity.

29 Please describe the eligible health care provider's telecommunications and/or Internet service needs, so that service providers may bid to provide the services. The description should describe whether video or store and forward consultations will be used, whether large image files or X-rays will be transmitted, the quality of connection needed, or other relevant considerations. Services required to support tele-medicine services, support access use and maintenance EHR, patient portals and data transfers.

Block 5: Request for Services

30 Is the HCP requesting reduced rates for:		
<input type="checkbox"/> Both Telecommunications & Internet Services	<input checked="" type="checkbox"/> Telecommunications Service ONLY	<input type="checkbox"/> Internet Service ONLY

Block 6: Certification

31 ☒ I certify that I am authorized to submit this request on behalf of the above-named entity or entities, that I have examined this request, and that to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

32 ☒ I certify that the health care provider has followed any applicable State or local procurement rules.

33 ☒ I certify that the telecommunications services and/or Internet access charges that the HCP receives at reduced rates as a result of the HCPs' participation in this program, pursuant to 47 U.S.C. Sec. 254 as implemented by the Federal Communications Commission, will be used solely for purposes reasonably related to the provision of health care service or instruction that the HCP is legally authorized to provide under the law of the state in which the services are provided and will not be sold, resold, or transferred in consideration for money or any other thing of value.

34 ☒ I certify that the health care provider is a non-profit or public entity.

35 ☒ I certify that the health care provider is located in a rural area. Visit the RHCD website: (<http://www.usac.org/rhc/tools/rhcd/Rural/2005/search.asp>) or contact RHCD at 1-800-229-5476 for a listing of rural areas.

36 ☒ Pursuant to 47 C.F.R. Secs. 54.601 and 54.603, I certify that the HCP or consortium that I am representing satisfies all of the requirements herein and will abide by all of the relevant requirements, including all applicable FCC rules, with respect to funding provided under 47 U.S.C. Sec. 254.

37 Signature
Electronically signed

38 Date
18-Mar-2016

39 Printed name of authorized person
Kenneth Schwartz

40 Title or position of authorized person
Director of Information Services & Quality

41 Employer of authorized person
Southside Community Services Board

42 Employer's FCC RN
0021625215

Please remember:

- ♦ Form 465 is the **first** step a health care provider must take in order to receive the benefit of reduced rates resulting from participation in this universal service support program.
- ♦ After the HCP submits a complete and accurate Form 465, the RHCD will post it on the RHCD web site for 28 days.
- ♦ HCPs may not enter into agreements to purchase eligible services from service providers before the **28 days expire**.
- ♦ After the HCP selects a service provider, the HCP must initiate the **next** step in the application process, the filing of Form 466 and/or 466A.

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 3 of the Commission's Rules authorize the FCC to request the information on this form. The purpose of the information is to determine your eligibility for certification as a health care provider. The information will be used by the Universal Service Administrative Company and/or the staff of the Federal Communications Commission, to evaluate this form, to provide information for enforcement and rulemaking proceedings and to maintain a current inventory of applicants, health care providers, billed entities, and service providers. No authorization can be granted unless all information requested is provided. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Act Project (3060-0804), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to pra@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0804.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

This form should be submitted to:

Rural Health Care Division
30 Lanidex Plaza West, P.O.Box 685
Parsippany NJ 07054-0685

Health Care Providers Universal Service
Description of Services Requested & Certification Form

Estimated time per response: 1 hour

Read instructions thoroughly before completing this form. Failure to comply may cause delayed or denied funding.

Form 465 Application Number (assigned by RHCD) 43161943

Block 1: HCP Location InformationInformation required in this block applies to the **physical location** of the HCP. Do not enter a "PO Box" or "Rural Route" address.

1 HCP Number 38319	2 Consortium Name	
3 HCP Name Southside Community Services Board - MCSP South Hill	4 HCP FCC Registration Number (FCC RN) 0021625215	
5 Contact Name Kenneth R Schwartz		
6 Address Line 1 823 N. Mecklenburg Ave		
7 Address Line 2	8 County Mecklenburg	
9 City South Hill	10 State VA	11 ZIP Code 23970
12 Phone # 434 572 6916 1565	13 Fax # (434) 374-3221	14 E-mail kschwartz@sscsb.org

Block 2: HCP Mailing Contact Information

15 Is the HCP's mailing address (where correspondence should be sent) different from its physical location described in Block 1?		<input checked="" type="checkbox"/> Yes, complete Block 2
		<input type="checkbox"/> No, go to Block 3.
16 Contact Name Kenneth R Schwartz		17 Organization Southside Community Services Board
18 Address Line 1 P.O. Box 1478		
19 Address Line 2		
20 City Clarksville	21 State VA	22 ZIP Code 23927
23 Phone # 434 572 6916 1565	24 Fax # (434) 374-3221	25 E-mail kschwartz@sscsb.org

Block 3: Funding Year Information

26 Funding Year (Check only one box)		
<input checked="" type="checkbox"/> Year 2016 (7/1/2016-6/30/2017)	<input type="checkbox"/> Year 2017 (7/1/2017-6/30/2018)	<input type="checkbox"/> Year 2018 (7/1/2018-6/30/2019)

Block 4: Eligibility

27 Only the following types of HCPs are eligible. Indicate which category describes the applicant. (Check only one.)	
<input type="checkbox"/> Post-secondary educational institution offering health care instruction, teaching hospital or medical school	<input type="checkbox"/> Rural health clinic
<input type="checkbox"/> Community health center or health center providing health care to migrants	<input type="checkbox"/> Consortium of the above
<input type="checkbox"/> Local health department or agency	<input type="checkbox"/> Dedicated ER of rural, for-profit hospital
<input checked="" type="checkbox"/> Community mental health center	<input type="checkbox"/> Part-time eligible entity
<input type="checkbox"/> Not-for-profit hospital	

28 If consortium, dedicated emergency department, or part-time eligible entity was selected in Line 27, please describe the entity.

29 Please describe the eligible health care provider's telecommunications and/or Internet service needs, so that service providers may bid to provide the services. The description should describe whether video or store and forward consultations will be used, whether large image files or X-rays will be transmitted, the quality of connection needed, or other relevant considerations. Services required to support tele-medicine services, support access use and maintenance EHR, patient portals and data transfers.
--

Block 5: Request for Services

30 Is the HCP requesting reduced rates for:		
<input type="checkbox"/> Both Telecommunications & Internet Services	<input checked="" type="checkbox"/> Telecommunications Service ONLY	<input type="checkbox"/> Internet Service ONLY

Block 6: Certification

31 <input checked="" type="checkbox"/> I certify that I am authorized to submit this request on behalf of the above-named entity or entities, that I have examined this request, and that to the best of my knowledge, information, and belief, all statements of fact contained herein are true.	
32 <input checked="" type="checkbox"/> I certify that the health care provider has followed any applicable State or local procurement rules.	
33 <input checked="" type="checkbox"/> I certify that the telecommunications services and/or Internet access charges that the HCP receives at reduced rates as a result of the HCPs' participation in this program, pursuant to 47 U.S.C. Sec. 254 as implemented by the Federal Communications Commission, will be used solely for purposes reasonably related to the provision of health care service or instruction that the HCP is legally authorized to provide under the law of the state in which the services are provided and will not be sold, resold, or transferred in consideration for money or any other thing of value.	
34 <input checked="" type="checkbox"/> I certify that the health care provider is a non-profit or public entity.	
35 <input checked="" type="checkbox"/> I certify that the health care provider is located in a rural area. Visit the RHCD website: (http://www.usac.org/rhc/tools/rhcd/Rural/2005/search.asp) or contact RHCD at 1-800-229-5476 for a listing of rural areas.	
36 <input checked="" type="checkbox"/> Pursuant to 47 C.F.R. Secs. 54.601 and 54.603, I certify that the HCP or consortium that I am representing satisfies all of the requirements herein and will abide by all of the relevant requirements, including all applicable FCC rules, with respect to funding provided under 47 U.S.C. Sec. 254.	
37 Signature Electronically signed	38 Date 18-Mar-2016
39 Printed name of authorized person Kenneth Schwartz	40 Title or position of authorized person Director of Information Services & Quality
41 Employer of authorized person Southside Community Services Board	42 Employer's FCC RN 0021625215

Please remember:

- ♦ Form 465 is the **first** step a health care provider must take in order to receive the benefit of reduced rates resulting from participation in this universal service support program.
- ♦ After the HCP submits a complete and accurate Form 465, the RHCD will post it on the RHCD web site for 28 days.
- ♦ HCPs may not enter into agreements to purchase eligible services from service providers before the **28 days expire**.
- ♦ After the HCP selects a service provider, the HCP must initiate the **next** step in the application process, the filing of Form 466 and/or 466A.

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

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This form should be submitted to:

Rural Health Care Division
30 Lanidex Plaza West, P.O.Box 685
Parsippany NJ 07054-0685

EXHIBIT 5

Health Care Providers Universal Service
Description of Services Requested & Certification Form

Estimated time per response: 1 hour

Read instructions thoroughly before completing this form. Failure to comply may cause delayed or denied funding.

Form 465 Application Number (assigned by RHCD) 43162477

Block 1: HCP Location InformationInformation required in this block applies to the **physical location** of the HCP. Do not enter a "PO Box" or "Rural Route" address.

1 HCP Number 30947	2 Consortium Name	
3 HCP Name Southside Community Services Board	4 HCP FCC Registration Number (FCC RN) 0021625215	
5 Contact Name Kenneth R Schwartz		
6 Address Line 1 523 Madison Street		
7 Address Line 2	8 County Mecklenburg	
9 City Boydton	10 State VA	11 ZIP Code 23917
12 Phone # (434) 572-1565 1565	13 Fax # (434) 374-3221	14 E-mail kschwartzsscsb@gmail.com

Block 2: HCP Mailing Contact Information

15 Is the HCP's mailing address (where correspondence should be sent) different from its physical location described in Block 1?	<input checked="" type="checkbox"/> Yes, complete Block 2 <input type="checkbox"/> No, go to Block 3.	
16 Contact Name Kenneth R Schwartz	17 Organization Southside Community Services Board	
18 Address Line 1 PO Box 1478		
19 Address Line 2		
20 City Clarksville	21 State VA	22 ZIP Code 23927
23 Phone # (434) 572-1565 1565	24 Fax # (434) 374-3221	25 E-mail kschwartz@sscsb.org

Block 3: Funding Year Information

26 Funding Year (Check only one box)
<input checked="" type="checkbox"/> Year 2016 (7/1/2016-6/30/2017) <input type="checkbox"/> Year 2017 (7/1/2017-6/30/2018) <input type="checkbox"/> Year 2018 (7/1/2018-6/30/2019)

Block 4: Eligibility

27 Only the following types of HCPs are eligible. Indicate which category describes the applicant. (Check only one.)	
<input type="checkbox"/> Post-secondary educational institution offering health care instruction, teaching hospital or medical school	<input type="checkbox"/> Rural health clinic
<input type="checkbox"/> Community health center or health center providing health care to migrants	<input type="checkbox"/> Consortium of the above
<input type="checkbox"/> Local health department or agency	<input type="checkbox"/> Dedicated ER of rural, for-profit hospital
<input checked="" type="checkbox"/> Community mental health center	<input type="checkbox"/> Part-time eligible entity
<input type="checkbox"/> Not-for-profit hospital	

28 If consortium, dedicated emergency department, or part-time eligible entity was selected in Line 27, please describe the entity.

29 Please describe the eligible health care provider's telecommunications and/or Internet service needs, so that service providers may bid to provide the services. The description should describe whether video or store and forward consultations will be used, whether large image files or X-rays will be transmitted, the quality of connection needed, or other relevant considerations. Services required to support tele-medicine services, support access use and maintenance EHR, patient portals and data transfers.

Block 5: Request for Services

30 Is the HCP requesting reduced rates for:
<input type="checkbox"/> Both Telecommunications & Internet Services <input checked="" type="checkbox"/> Telecommunications Service ONLY <input type="checkbox"/> Internet Service ONLY

Block 6: Certification

31 <input checked="" type="checkbox"/> I certify that I am authorized to submit this request on behalf of the above-named entity or entities, that I have examined this request, and that to the best of my knowledge, information, and belief, all statements of fact contained herein are true.	
32 <input checked="" type="checkbox"/> I certify that the health care provider has followed any applicable State or local procurement rules.	
33 <input checked="" type="checkbox"/> I certify that the telecommunications services and/or Internet access charges that the HCP receives at reduced rates as a result of the HCPs' participation in this program, pursuant to 47 U.S.C. Sec. 254 as implemented by the Federal Communications Commission, will be used solely for purposes reasonably related to the provision of health care service or instruction that the HCP is legally authorized to provide under the law of the state in which the services are provided and will not be sold, resold, or transferred in consideration for money or any other thing of value.	
34 <input checked="" type="checkbox"/> I certify that the health care provider is a non-profit or public entity.	
35 <input checked="" type="checkbox"/> I certify that the health care provider is located in a rural area. Visit the RHCD website: (http://www.usac.org/rhc/tools/rhcd/Rural/2005/search.asp) or contact RHCD at 1-800-229-5476 for a listing of rural areas.	
36 <input checked="" type="checkbox"/> Pursuant to 47 C.F.R. Secs. 54.601 and 54.603, I certify that the HCP or consortium that I am representing satisfies all of the requirements herein and will abide by all of the relevant requirements, including all applicable FCC rules, with respect to funding provided under 47 U.S.C. Sec. 254.	
37 Signature Electronically signed	38 Date 06-Apr-2016
39 Printed name of authorized person Kenneth Schwartz	40 Title or position of authorized person Director of Information Services & Quality
41 Employer of authorized person Southside Community Services Board	42 Employer's FCC RN 0021625215

Please remember:

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- After the HCP submits a complete and accurate Form 465, the RHCD will post it on the RHCD web site for 28 days.
- HCPs may not enter into agreements to purchase eligible services from service providers before the **28 days expire**.
- After the HCP selects a service provider, the HCP must initiate the **next** step in the application process, the filing of Form 466 and/or 466A.

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This form should be submitted to:

Rural Health Care Division
30 Lanidex Plaza West, P.O.Box 685
Parsippany NJ 07054-0685

EXHIBIT 6

Factor	Point Available	GCR	Network Solutions	RHT
Price of the eligible products and Services	30	15	20	25
Prior experience with the vendor	20	20	0	0
Prices for ineligible services products, and fees	25	15	20	25
Flexible invoicing: FCC Form 472 or FCC Form 474	15	0	0	15
Local or in-state vendor	10	10	0	0
Totals:	100	60	40	65

List of Disqualified Bidders:

None

EXHIBIT 7

**Universal Service Administrative Company
Rural Healthcare
Attn: Letter of Appeal
700 12th Street NW, Suite 900
Washington D.C. 20005**

December 8, 2016

- HCP 30947 FRN 16944111
- HCP 30947 FRN 16880631
- HCP 28296 FRN 16944131
- HCP 28296 FRN 16880661
- HCP 38319 FRN 16944151
- HCP 38319 FRN 16880681
- HCP 38311 FRN 16944171
- HCP 38311 FRN 16880691

Southside Community Services Board would like to file an appeal for the FRN's referenced above. The denial reasons for each FRN are as follows: *"The HCP has violated the Telecommunication's Program competitive bidding rules. See 47 C.F.R. Section 54.603."*

The BID matrix that was submitted was for the funding year 2014. This submission was a mistake on our part. We asked the reviewer to disregard the documents that were originally attached. The reason that we asked the reviewer to disregard the originally attached documents was because they were from the previous funded year 2014. After we received an additional request for information, we responded again as well as contacted the reviewer via telephone.

Attached you will find BID's that we received during the 2014 funding year. Each document is date stamped with the month and year we received the BID's. Based on these listed facts, Southside Community Service Board is requesting that the denial of funding should be revised.

If any additional documentation or information needs to be provided, please don't hesitate to contact Betty Rose or Kenneth Schwartz.

Kenneth Schwartz
143 Industrial Parkway
Clarksville, VA 23927
kschwartz@sscsb.org
434-572-6916 EXT 1565

Betty Rose
143 Industrial Parkway
Clarksville, VA 23927
brose@sscsb.org
434-572-6916 EXT 1530

Thank you,

Betty Rose
Quality Assurance Coordinator

EXHIBIT 8



Rose, Betty <brose@sscsb.org>

Action Required - RHC Telecommunications Program - Submit Requested Information - FCC Form 466 HCP # 28296, FRN 1688066

3 messages

rhc-assist@usac.org <rhc-assist@usac.org>
To: brose@sscsb.org, kschwartz@sscsb.org

Fri, Sep 30, 2016 at 9:00 AM

Date: 30-Sep-2016

HCP Number:	28296
FCC Form 465 Application Number:	43161941
Funding Request Number (FRN):	1688066
Service Type:	T3 or DS3
Funding Year:	2016

The Rural Health Care (RHC) division of the Universal Service Administrative Company (USAC) has received the FCC Form 466 submitted by the HCP referenced above. However, RHC cannot process the form without information for FRN 1688066. To view and respond to the request for information, log into My Portal at <https://rhc.usac.org/rhc/>, go to Information Requested on the My Documents tab, and click on the "Request Type" hyperlink. Click on "Submit Response" to submit the information requested. Any account holder will be able to respond to an Information Request; once it has been completed, the request is removed from the Information Requests section and the information provided will be saved to your My Documents folder.

The information requested is required to process the above referenced form, and must be submitted to RHC by the deadline. Failure to respond to the email may impact funding.

Do not reply to this email - RHC does not monitor this account. For questions or assistance about the information request, contact the RHC Help Desk at 800-453-1546 or click on the "Contact RHC Help Desk" link in My Portal.

EXHIBIT 9

Information Request

Support Documentation

Request Type

Bid Documentation

Deadline

10/15/2016

Requested information.

FRN: 1688063 The HCP must submit to USAC all responses or bids received in response to the requested services posted on the FCC Form 465. The FCC Form 465 shows that the HCP received multiple bids in response to the posted Form 465 Request for Services. However, no bids were submitted with the funding request. Please respond to this Information Request as soon as possible with the following: 1) all bids received, 2) bid evaluation criteria, 3) the executed bid evaluation (if distinct from the evaluation criteria), and 4) any bid solicitation materials used by the HCP to request the services in addition to the FCC Form 465. The funding request cannot be processed without the bids. A response is required. Responses not received within 14 calendar days may result in a denial of this funding request. For questions or assistance about this information request, contact Jeremy Mathovich at 202-772-8290.

Response

We did not receive any bid requests besides TOC's. Please contact me if there are any questions and/or concerns.

A reply was made in response to this request.

LEAC x Rural Health Care - USA x

https://rhc.usac.org/rhc/external/ApplicantPortal?cid=76922

Virginia Medicaid Web The Mantri System Credible CHRIS SSCSB tobacco ESS Bryant Email Blackboard USAC Sharepoint

Supporting documentation
Communication between the
Other information listed in the
The PDF of the submitted forms
All times and related documents
Application Number and Extension

Information Request

Support Documentation

Request Type
Bid Documentation

Deadline
10/15/2016

Requested Information.
FRN: 1688066 The HCP must submit to USAC all responses or bids received in response to the requested services posted on the FCC Form 465. The FCC Form 466 shows that the HCP received multiple bids in response to the posted Form 465 Request for Services. However, no bids were submitted with the funding request. Please respond to this Information Request as soon as possible with the following: 1) all bids received, 2) bid evaluation criteria, 3) the executed bid evaluation (if distinct from the evaluation criteria), and, 4) any bid solicitation materials used by the HCP to request the services in addition to the FCC Form 465. The funding request cannot be processed without the bids. A response is required. Responses not received within 14 calendar days may result in a denial of this funding request. For questions or assistance about this information request, contact Jeremy Matkovich at 202-772-6290.

Response
We did not receive any bid requests besides FCC's. Please contact me if there are any questions and/or concerns.
Betsy

Request Date
Oct 8, 2016
Exp. Date
Sep 30, 2016

Response Date
Oct 8, 2016
Exp. Date
Sep 30, 2016

Response
A reply was made in response to this request.

Terms and Conditions

HCP Number: 28298

- Supporting documentation
- Communication between the
- Other information used in the
- The PDF of the submitted form
- All forms and related document
- Attribution Number and Filing

Information Request

Support Documentation

Request Type
Bid Documentation

Deadline
10/15/2016

Requested information.
FRN: 1688068 The HCP must submit to USAC all responses or bids received in response to the requested services posted on the FCC Form 465. The FCC Form 466 shows that the HCP received multiple bids in response to the posted Form 465 Request for Services. However, no bids were submitted with the funding request. Please respond to this Information Request as soon as possible with the following: 1) all bids received, 2) bid evaluation criteria, 3) the executed bid evaluation (if distinct from the evaluation criteria), and, 4) any bid solicitation materials used by the HCP to request the services in addition to the FCC Form 465. The funding request cannot be processed without the bids. A response is required. Responses not received within 14 calendar days may result in a denial of this funding request. For questions or assistance about this information request, contact Jeremy Matkovich at 202-772-6290.

Response
We did not receive any bid requests besides TOC's. Please contact me if there are any questions and/or concerns.
Betsy

Send Message

A reply was made in response to this request

Terms and Conditions

Modules (HSS)

process

ated:

ed 465 plus the 465

HCP HCP Number: 38319

Responded Date

10/15/2016

10/16/2016

- Supporting documentation
 - Communication between the
 - Other information used in the
- The PDF of the submitted form
- All forms and related documents
- Application Number and Financial

Information Request

Support Documentation

Request Type
Bid Documentation

Deadline
10/15/2016

Requested information.
FRN: 1688069 The HCP must submit to USAC all responses or bids received in response to the requested services posted on the FCC Form 465. The FCC Form 465 shows that the HCP received multiple bids in response to the posted Form 465 Request for Services. However, no bids were submitted with the funding request. Please respond to this Information Request as soon as possible with the following: 1) all bids received, 2) bid evaluation criteria, 3) the executed bid evaluation (if distinct from the evaluation criteria), and, 4) any bid solicitation materials used by the HCP to request the services in addition to the FCC Form 465. The funding request cannot be processed without the bids. A response is required. Responses not received within 14 calendar days may result in a denial of this funding request. For questions or assistance about this information request, contact Jeremy Matkovich at 202-772-6290.

Response

We did not receive any bid requests besides TDC's. Please contact me if there are any questions and/or concerns.

Betty

Submit response

A reply was made in response to this request.

[Terms and Conditions](#)

modules (HSS)

process

med:

ted 465 plus the 465

ston HCP Number: 39311

Responded Date

5/2016

6/2016

EXHIBIT 10



Rose, Betty <brose@sscsb.org>

Action Required - RHC Telecommunications Program - Submit Requested Information - FCC Form 466 HCP # 28296, FRN 1688066

2 messages

rhc-assist@usac.org <rhc-assist@usac.org>
To: brose@sscsb.org, kschwartz@sscsb.org

Thu, Oct 6, 2016 at 9:30 AM

Date: 06-Oct-2016

HCP Number:	28296
FCC Form 465 Application Number:	43161941
Funding Request Number (FRN):	1688066
Service Type:	T3 or DS3
Funding Year:	2016

The Rural Health Care (RHC) division of the Universal Service Administrative Company (USAC) has received the FCC Form 466 submitted by the HCP referenced above. However, RHC cannot process the form without information for FRN 1688066. To view and respond to the request for information, log into My Portal at <https://rhc.usac.org/rhc/>, go to Information Requested on the My Documents tab, and click on the "Request Type" hyperlink. Click on "Submit Response" to submit the information requested. Any account holder will be able to respond to an Information Request; once it has been completed, the request is removed from the Information Requests section and the information provided will be saved to your My Documents folder.

The information requested is required to process the above referenced form, and must be submitted to RHC by the deadline. Failure to respond to the email may impact funding.

Do not reply to this email - RHC does not monitor this account. For questions or assistance about the information request, contact the RHC Help Desk at 800-453-1546 or click on the "Contact RHC Help Desk" link in My Portal.

EXHIBIT 11

The PDF of the submitted form

All forms and related documents
Application Number and Form

MY FORMS

MY DOCUMENTS

- 2018
- 2012
- 2014

Requested Date

- Oct 8, 2016
- Sep 30, 2016
- Aug 16, 2012
- Aug 16, 2012
- Aug 16, 2012
- Aug 16, 2012
- Aug 15, 2012
- Aug 7, 2012
- Aug 7, 2012

[Terms and Conditions](#)

Information Request

Re: Support Documentation

This request was made in response to [Support Documentation](#).

Request Type
Bid Documentation

Deadline
10/15/2016

Requested information.

FRN: 1688063 The HCP must submit to USAC all responses or bids received in response to the requested services posted on the FCC Form 465. The FCC Form 465 shows that the HCP received multiple bids in response to the posted Form 465 Request for Services. However, no bids were submitted with the funding request. Please respond to this Information Request as soon as possible with the following: 1) all bids received, 2) bid evaluation criteria, 3) the executed bid evaluation (if distinct from the evaluation criteria), and 4) any bid solicitation materials used by the HCP to request the services in addition to the FCC Form 465. The funding request cannot be processed without the bids. A response is required. Responses not received within 9 calendar days may result in a denial of this funding request. For questions or assistance about this information request, contact Jeremy Matkovich at 202-772-6290.

Response

The BID number that was submitted was for the funding year 2014. This submission was a mistake on our part. Please disregard the BID number that was submitted. For funding year 2016, we did not receive any bid requests besides TOCs.

[Submit a Response](#)

ited.

ed 465 plus the 465

ard HCP Number: 30947

Requested Date

- Oct 5, 2016
- Oct 1, 2016

AC X Rural Health Care - USAC X

s://rhc.usac.org/rhc/external/ApplicantPortal?cid=76822

Virginia Medicaid Web The Marist System Credible CHRIS SSCSB tobacco ESS Bryant Email Blackboard USAC SharePoint

Supporting documentation
Communication between the
Other information used in the
The FCC of the submitted form
All forms and related documents
Application Number and Email

Information Request

Re: Support Documentation

This request was made in response to [Support Documentation](#).

Request Type
Bid Documentation

Deadline
10/15/2016

Requested Information.
FRN: 1688066 The HCP must submit to USAC all responses or bids received in response to the requested services posted on the FCC Form 465. The FCC Form 466 shows that the HCP received multiple bids in response to the posted Form 465 Request for Services. However, no bids were submitted with the funding request. Please respond to this Information Request as soon as possible with the following: 1) all bids received, 2) bid evaluation criteria, 3) the executed bid evaluation (if distinct from the evaluation criteria), and, 4) any bid solicitation materials used by the HCP to request the services in addition to the FCC Form 465. The funding request cannot be processed without the bids. A response is required. Responses not received within 9 calendar days may result in a denial of this funding request. For questions or assistance about this information request, contact Jeremy Melkovich at 202-772-6290.

Response
The Bid history that was submitted was for the funding year 2014. This submission was a mistake on our part. Please disregard the BID history that was submitted. For funding year 2016, we did not receive any bid requests besides TOC's.

Requested Date
Oct 5, 2016
Sep 30, 2016

Submitted Date
Oct 5, 2016

Terms and Conditions

Module (HSS)
Process
Bid
and 465 plus the 465

and HCP Number: 28290

Requested Date
Oct 5, 2016
Oct 6, 2016

- Supporting documentation
- Communication between the
- Other information used in the
- The PDP of the submitted form
- All forms and related information
- Application Number and Extension

MY FORMS MY DOCUMENTS

- 2015
- 2014

Requested Date

Oct 6, 2016

Sep 30, 2016

Terms and Conditions

Information Request

Re: Support Documentation

This request was made in response to [Support Documentation](#)

Request Type
Bid Documentation

Deadline
10/15/2016

Requested information

FRN: 1688008 The HCP must submit to USAC all responses or bids received in response to the requested services posted on the FCC Form 465. The FCC Form 465 shows that the HCP received multiple bids in response to the posted Form 465 Request for Services. However, no bids were submitted with the funding request. Please respond to this Information Request as soon as possible with the following: 1) all bids received, 2) bid evaluation criteria, 3) the executed bid evaluation (if distinct from the evaluation criteria) and, 4) any bid solicitation materials used by the HCP to request the services in addition to the FCC Form 465. The funding request cannot be processed without the bids. A response is required. Responses not received within 9 calendar days may result in a denial of this funding request. For questions or assistance about this information request, contact Jeremy Matlovich at 202-772-6290.

Response

The BID matrix that was submitted was for the funding year 2014. This submission was a mistake on our part. Please disregard the BID matrix that was submitted. For funding year 2016, we did not receive any bid requests besides TOC's.

Submit Document

advises (HSS)

process

ited.

led 465 plus the 465

HCP Number: 38319

Requested Date

Oct 6, 2016

Oct 6, 2016

- Supporting documentation
- Communication between the
- Other information used in the
- The PDF of the submitted form
- All forms and related documents
- stabilization Number and Prior

MY FORMS MY DOCUMENTS

2014
2015

Requested Date

Oct 5, 2016
Feb 30, 2016

Terms and Conditions

Information Request

Re: Support Documentation

This request was made in response to [Support Documentation](#).

Request Type
Bid Documentation

Deadline
10/15/2016

Requested information.
FRN: 1688089 The HCP must submit to USAC all responses or bids received in response to the requested services posted on the FCC Form 465. The FCC Form 466 shows that the HCP received multiple bids in response to the posted Form 465 Request for Services. However, no bids were submitted with the funding request. Please respond to this Information Request as soon as possible with the following: 1) all bids received, 2) bid evaluation criteria, 3) the executed bid evaluation (if distinct from the evaluation criteria), and, 4) any bid solicitation materials used by the HCP to request the services in addition to the FCC Form 465. The funding request cannot be processed without the bids. A response is required. Responses not received within 9 calendar days may result in a denial of this funding request. For questions or assistance about this information request, contact Jeremy Matkovich at 202-772-8290.

Response
The BID matrix that was submitted was for the funding year 2014. This submission has a mistake on our part. Please disregard the BID matrix that was submitted. For funding year 2016, we did not receive any bid requests besides TCC1.

Submitted documents

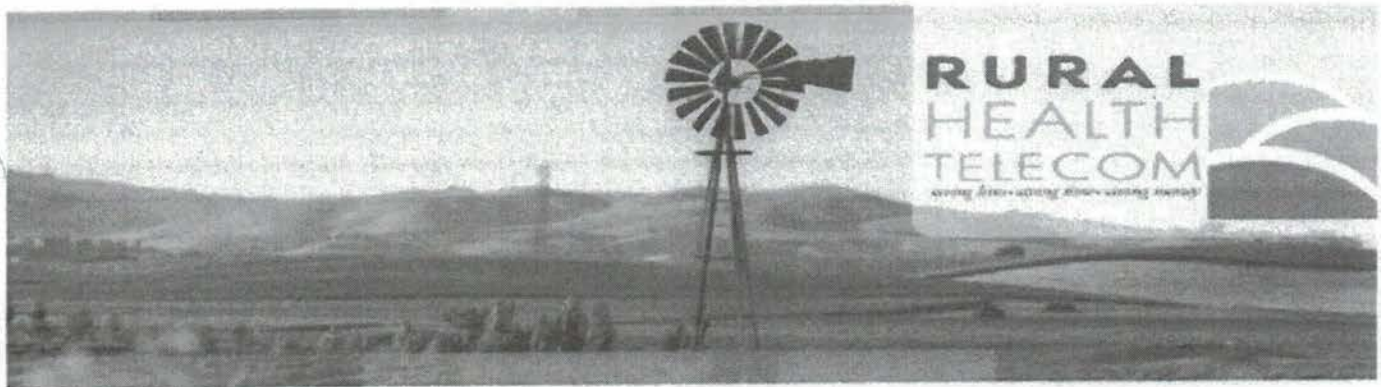
modules (HSS)
process
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ed 465 plus the 465

ston HCP Number: 38311

Requested Date

6, 2016
16, 2016

EXHIBIT 12



Proposed Network Pricing - Gross Monthly Recurring/Installation

Network Type:	Healthnet with Internet Access
Pricing Term:	60 Months

[illegible]

Notes:

Quote is valid for 30 days from issue date of: April 29, 2016
All pricing presented is contingent on available facilities from the carrier(s).
Charges reflect gross charges and do not include possible funding through the Universal Service Fund.
This proposal does not constitute a contractual agreement.
*Promotional Offer: Service qualifies for the Crash Cart Diagnostic Network Assessment promotion.

EXHIBIT 13

Administrator's Decision on Rural Health Care Program Appeal

Via Electronic Mail

March 15, 2019

Ms. Betty Rose
Southside Community Services Board
143 Industrial Parkway
Clarksville, VA 23927

Re: Southside Community Services Board – Appeal of USAC's Decision for Funding
Request Numbers Listed in Appendices A and B

Dear Ms. Rose:

The Universal Service Administrative Company (USAC) has completed its evaluation of the December 9, 2016 letter of appeal (Appeal) submitted by Southside Community Services Board (SCSB) for the health care providers listed in Appendices A and B.¹ On October 10, 2016 and December 6, 2016, USAC denied SCSB's funding requests for support under the Rural Health Care Telecommunications Program (Telecom Program) for funding year 2016 (FY 2016).² The Appeal requests that USAC reverse the denial of the funding request numbers (FRNs) listed in Appendices A and B in the Telecom Program.³

USAC has reviewed the Appeal and the facts related to this matter and has determined that Federal Communications Commission (FCC) rules and requirements support the denial of the FRNs listed in Appendices A and B because SCSB did not provide sufficient documentation to demonstrate that it complied with the FCC's competitive bidding rules. Specifically, SCSB failed to submit copies of the bids received in response to the FY 2016 request for services. As a result, USAC denies the Appeal.

Background

FCC rules require eligible health care providers (HCPs) seeking funding from the Telecom Program to conduct a competitive bidding process for eligible services by submitting an FCC

¹ See Letter from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, to Rural Health Care Division, USAC (Dec. 9, 2016) (Appeal). Although the Appeal is dated December 8, 2016, it was submitted to USAC on December 9, 2016 via email. See Appeal; Email from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, to Rural Health Care Division, USAC (Dec. 9, 2016).

² See Emails from Rural Health Care Division, USAC, to Southside Community Services Board (Oct. 10, 2016) (Administrator's Denials of FRNs listed in Appendix A); Emails from Rural Health Care Division, USAC, to Southside Community Services Board (Dec. 6, 2016) (Administrator's Denials of FRNs listed in Appendix B).

³ See Appeal.

Form 465 (Description of Services Requested & Certification Form) and waiting at least 28 days before selecting a service provider.⁴ Once an HCP selects a service provider, it submits an FCC Form 466 (Funding Request & Certification Form) to provide information about the services selected and to certify that the services selected are the most cost-effective options of the offers received.⁵ With the FCC Form 466, the HCP must provide copies of all bids received in response to its FCC Form 465.⁶ HCPs are required to submit the FCC Form 466 and all supporting documentation prior to the end of the relevant funding year.⁷

The FCC clarified that, beginning with FY 2015, when USAC determines that an applicant lacks all supporting documentation accompanying its FCC Form 466 or the supporting documentation is inadequate, USAC shall inform the applicant promptly in writing of the omission or inadequacy and give the applicant 14 calendar days from receipt of that notice to submit the missing or relevant supporting documentation.⁸ If applicants do not provide timely responses to USAC's requests for omitted or adequate supporting documentation, USAC must deny the associated funding request.⁹ The responsibility to submit complete and accurate information remains at all times the sole responsibility of the applicant.¹⁰ USAC is not authorized to waive the FCC's rules and requirements governing the Telecom Program.¹¹

SCSB's Funding Requests

FRNs Listed in Appendix A. Between March 18, 2016 and April 6, 2016, SCSB submitted four FCC Forms 465, requesting bids for services for FY 2016.¹² On August 31, 2016, SCSB submitted four corresponding FCC Forms 466 for the FRNs in Appendix A, seeking support for services from TeleQuality Communications, Inc. (TeleQuality).¹³ On each of the FCC Forms

⁴ See 47 C.F.R. § 54.603(a), (b)(3); Health Care Providers Universal Service, Description of Services Requested & Certification Form, OMB 3060-0804 at 2 (July 2014) (FCC Form 465); Form 465 Instructions, Rural Health Care Universal Service Mechanism, OMB 3060-0804 at 1 (July 2014) (FCC Form 465 Instructions).

⁵ See 47 C.F.R. §§ 54.603(b)(4), 54.615(a), (c)(7); Health Care Providers Universal Service, Funding Request and Certification Form, OMB 3060-0804 (July 2014) (FCC Form 466); Form 466 Instructions, Rural Health Care Universal Service Mechanism, OMB 3060-0804 (July 2014) (FCC Form 466 Instructions).

⁶ See 47 C.F.R. § 54.603(b)(4); FCC Form 466 at 1; FCC Form 466 Instructions at 9.

⁷ See 47 C.F.R. § 54.675(b); FCC Form 466 at 1; FCC Form 466 Instructions at 1.

⁸ See *Form 466 Deadline Order*, 30 FCC Rcd at 231, para. 3.

⁹ See *id.*

¹⁰ See *Rural Health Care Support Mechanism*, WC Docket No. 02-60, Report and Order, 27 FCC Rcd 16678, 16785, para. 242; 16803, para. 300 (2012).

¹¹ See generally, 47 C.F.R. § 54.702(c) (2014) (“[USAC] may not make policy, interpret unclear provisions of the statute or rules, or interpret the intent of Congress.”); 47 C.F.R. § 1.3 (2014) (“The provisions of this chapter may be suspended, revoked, amended, or waived for good cause shown, in whole or in part, at any time by the Commission, subject to the provisions of the Administrative Procedures Act and the provisions of this chapter.”).

¹² See FY 2016 FCC Forms 465 Nos. 43161941, 43161942, and 43161943 (Mar. 18, 2016); FY 2016 FCC Form 465 No. 43162477 (Apr. 18, 2016).

¹³ See FY 2016 FCC Form 466 for FRNs listed in Appendix A (Aug. 31, 2016).

466, SCSB indicated that it received bids in response to its FCC Forms 465.¹⁴ To support the information on the FCC Forms 466, SCSB submitted a copy of its bid evaluation matrix, which provided scores for three service providers, including TeleQuality.¹⁵ SCSB did not provide copies of the bids it received in response to its FCC Forms 465.

On September 30, 2016, USAC sent information requests to SCSB for the FRNs in Appendix A, requesting that it provide copies of the bids submitted in response to its FCC Forms 465, the bid criteria and any other documentation used to evaluate bids, and any materials used in addition to the FCC Forms 465 to request the services.¹⁶ In the information requests, USAC noted that SCSB had indicated in its FCC Forms 466 that it received bids in response to its FCC Forms 465.¹⁷ In response to USAC's information request, SCSB stated that TeleQuality was the only bidding service provider, but did not provide a copy of TeleQuality's bid or any other competitive bidding documentation.¹⁸

On October 6, 2016, USAC sent follow-up information requests to SCSB for the FRNs in Appendix A, requesting the same information and documentation identified in USAC's September 30, 2016 information requests.¹⁹ In response to USAC's follow-up requests, SCSB again stated that TeleQuality was the only bidding service provider, and asserted that the bid evaluation matrix it submitted with its FCC Forms 466 was for FY 2014, and was submitted in error.²⁰ As in its previous response, SCSB did not provide a copy of TeleQuality's bid or any other competitive bidding documentation. On October 10, 2016, USAC denied the FRNs in Appendix A because SCSB did not submit copies of the bids it received in response to its FCC Forms 465, and failed to demonstrate that its funding requests complied with the FCC's competitive bidding rules.²¹

FRNs Listed in Appendix B. After the denial of the FRNs listed in Appendix A, on November 4, 2016, SCSB submitted four more FY 2016 FCC Forms 466 for the FRNs in Appendix B.²² Because SCSB sought support for the same services from TeleQuality at the same locations, and were supported by the same documentation, USAC determined that the new funding requests

¹⁴ See *id.*

¹⁵ See Southside Community Services Board, Bid Evaluation Matrix (filed Aug. 31, 2016).

¹⁶ See Emails from Rural Health Care Division, USAC to Southside Community Services Board (Sept. 30, 2016).

¹⁷ See *id.*

¹⁸ See Email from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board, Rural Health Care Division, USAC (Oct. 6, 2016).

¹⁹ See Emails from Rural Health Care Division, USAC, to Southside Community Services Board (Oct. 6, 2016).

²⁰ See Email from Betty Rose, Quality Assurance Coordinator, Southside Community Services Board to the Rural Health Care Division, USAC (Oct. 6, 2016).

²¹ See Administrator's Denials of FRNs listed in Appendix A.

²² See FY 2016 FCC Forms 466 for FRNs listed in Appendix B (Nov. 4, 2016).

were duplicates of the FRNs in Appendix A.²³ The FRNs in Appendix B were also associated with the same FCC Forms 465 and competitive bidding process as the FRNs in Appendix A.²⁴ However, whereas SCSB had previously indicated in its forms and information request responses for the FRNs in Appendix A that it received bids in response to its FCC Forms 465,²⁵ SCSB indicated on the new FCC Forms 466 that it did not receive any bids in response to the same requests for services.²⁶ SCSB did not provide any information or documentation to resolve this discrepancy. On December 6, 2016, USAC denied the FRNs in Appendix B because SCSB failed to demonstrate that its funding requests complied with the FCC's competitive bidding rules.²⁷

SCSB's Appeal

On December 9, 2016, SCSB appealed USAC's denial of the FRNs in Appendices A and B.²⁸ In the Appeal, SCSB reiterates its assertion that the bidding matrix that it submitted was for FY 2014, and provides copies of a bid from TeleQuality dated September 25, 2014 and bids from two other service providers dated September 30, 2014 and December 18, 2014.²⁹ SCSB did not provide any other competitive bidding documentation, including a copy of its bid from TeleQuality for FY 2016.

Administrator's Decision on Appeal

Based on a review of the facts and documentation provided, USAC finds that SCSB did not comply with the FCC's competitive bidding rules as SCSB failed to submit copies of the bids it received in response to its FY 2016 request for services.³⁰ As stated previously, SCSB indicated that it received a bid from TeleQuality in response to its FY 2016 request for services. However, SCSB did not provide a copy of TeleQuality's bid in response to USAC's information requests or with the FCC Forms 466. As a result, USAC was unable to determine whether the FRNs listed in Appendices A and B complied with the FCC's competitive bidding rules. Therefore, USAC denies the Appeal.

²³ Compare FY 2016 FCC Form 466 for FRNs listed in Appendix A (Aug. 31, 2016) with FY 2016 FCC Forms 466 for FRNs listed in Appendix B (Nov. 4, 2016) (requesting support for the services, from the same service provider, at the same locations).

²⁴ See *id.*

²⁵ See *supra* notes 16, 18, 20.

²⁶ See FY 2016 FCC Forms 466 for FRNs listed in Appendix B (Nov. 4, 2016).

²⁷ See Administrator's Denials of FRNs listed in Appendix B.

²⁸ See *Appeal*.

²⁹ See TeleQuality Communications, Bid for Southside Community Services Board (Sept. 25, 2014); Network Services Solutions, LLC, Bid for Southside Community Services Board (Sept. 30, 2014); GCR Communications, Bid for Southside Community Services Board (Dec. 18, 2014).

³⁰ 47 C.F.R. § 54.603(b)(4).

Ms. Betty Rose & Mr. Kenneth Schwartz
Southside Community Services Board
March 15, 2019
Page 5 of 7

Conclusion

USAC finds that SCSB did not provide sufficient documentation to demonstrate that the FRNs in Appendices A and B complied with the FCC's competitive bidding rules. Specifically, SCSB failed to submit copies of the bids received in response to the FY 2016 request for services. As a result, USAC denies the Appeal.

If you wish to appeal this decision to the FCC or request a waiver, you can follow the instructions pursuant to 47 C.F.R. Part 54, Subpart I (47 C.F.R. §§ 54.719 to 725). Further instructions for filing appeals or requesting waivers are available at:

<http://www.usac.org/about/about/program-integrity/appeals.aspx>

Sincerely,

/s/ Universal Service Administrative Company

Cc:

Ms. Betty Rose & Mr. Kenneth Schwartz
Southside Community Services Board
450 Washington Street
Boydton, VA 23917

Ms. Betty Rose & Mr. Kenneth Schwartz
Southside Community Services Board – HDTC/CSP
3030 Philpott Road
South Boston, VA 24592

Ms. Betty Rose & Mr. Kenneth Schwartz
Southside Community Services Board
523 Madison Street
Boydton, VA 23917

Ms. Betty Rose & Mr. Kenneth Schwartz
Southside Community Services Board – MCSP
823 N. Mecklenburg Ave.
South Hill, VA 23970

APPENDIX A

Southside Community Services Board FY 2016 FRNs Submitted August 31, 2016

HCP Number	HCP Name	FRN	Form 465 Application Number	Allowable Contract Selection Date (ACSD)
28296	Southside Community Services Board	1688066	43161941	April 16, 2016
30947	Southside Community Services Board	1688063	43162477	May 5, 2016
38311	Southside Community Services Board – HDTC/CSP South Boston	1688069	43161942	April 16, 2016
38319	Southside Community Services Board – MCSP South Hill	1688068	43161943	April 16, 2016

APPENDIX B

Southside Community Services Board FY 2016 FRNs Submitted November 4, 2016

HCP Number	HCP Name	FRN	Form 465 Application Number	Allowable Contract Selection Date (ACSD)
28296	Southside Community Services Board	1694413	43161941	April 16, 2016
30947	Southside Community Services Board	1694411	43162477	May 5, 2016
38311	Southside Community Services Board – HDTC/CSP South Boston	1694417	43161942	April 16, 2016
38319	Southside Community Services Board – MCSP South Hill	1694415	43161943	April 16, 2016