

as their provider for their telecom and internet services after the company agreed to provide the services on the same terms that was previously agreed with Central Telecom Group Inc.

### USAC Review and School Response

In September of 2017 we got a review from USAC (Machado Glisban) asking the school to provide documentation to verify service delivery, such as Service Provider bills and to provide proof of payment. At that time the school provided the Top Quality Communication invoices for the above mentioned FRNs and they also sent copies of the school payments to Top Quality Communication. At that time we brought up an issue with the reviewer (Machado Glisban), that these invoices are from a different service provider for what was originally entered on the form 471, I also advised her of our intention to file for Correctional SPIN Change and I asked her if I should submit a RAL at that time. Her response to me was, I should not file for any changes at this time, and that she will make the changes and let me know if there are any other questions or if additional information is needed

### USAC FCDL

On 2/13/2018 we received an FCDL denying the above FRNs. The reason given was: DR1: The FRN is denied because the applicant failed to provide at the request of the Program Administrator all requested documentation. Specifically, prior to commitment of the FRN, you were asked to submit documentation to support that the services requested in the FRN were delivered during the funding year and/or you were asked to provide vendor documentation in support of the FRN. You provided a response which failed to demonstrate that services were delivered by the service provider listed for the FRN. Therefore, your FRN is denied.

### Appeal to USAC and USAC Decision on Appeal

We appealed this directly with USAC on the grounds that we believe that we provided just that and we did not receive any follow up questions on our response. On 04/04/2018 we received an RFCDL denying our appeal the reason given was: -USAC denied your funding requests because the applicant failed to provide at the request of the Program Administrator all requested documentation. Specifically, prior to commitment of the FRN, you were asked to submit documentation to support that the services requested in the FRN were delivered during the funding year and/or you were asked to provide vendor documentation in support of the FRN. You provided a response which failed to demonstrate that services were delivered by the service provider listed for the FRN. During the PIA review of the FRNs, the applicant provided documentation which does not indicate that the services requested in the FRNs were delivered by the service provider listed for the FRN, Central Telecom Group Inc, SPIN 143048853. Since documents were provided with a different service provider, the FRNs were denied for failure to demonstrate delivery of service with the service provider listed for the FRNs. On appeal you have submitted the same documentation and accordingly have failed to demonstrate delivery of service from Central Telecom Group Inc, for the FRNs. On appeal you have provided no new information that could overturn the denial of the FRN. Consequently, your appeal is denied.