

May 14, 2018

Federal Communications Commission
Office of the Secretary
445 - 12th Street, SW
Washington, DC 20554

Dear Sirs:

**CC Docket No. 02-6
Appeal Request**

This is an Appeal Letter.

Contact Information:	Greg Spencer WGS Consulting CRN 16062188 7512 Tottenham Place New Albany, Ohio 43054-9444 Telephone Number: 614.989.5399 Fax Number: 614.882.2556 Email Address: wgs003@gmail.com
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Appellant Name:	Columbus Metropolitan Library
Applicant BEN:	129176
Form 471 Application Number:	161000206
Funding Request Number:	1699040192
Service Provider Name:	Time Warner Cable
Service Provider Number:	143048275

Appeal Narrative

The Columbus Metropolitan Library (CML BEN – 129176) respectfully appeals the decision by USAC (attached document - Post Commitment Request - 84932 - COLUMBUS METROPOLITAN LIBRARY.pdf) that denied CML's appeal (attached document – USAC Appeal.pdf) of the processing of the BEAR Form 472# 2702389.

USAC denied the appeal based on the initial filing of the Form 471 for Funding Year 2016.

CML is an urban metropolitan library system located in Columbus, Ohio. For Funding Year 2016, CML's discount percentage was 90%. The denial of the \$27,823.50 based on the reasons outlined in the USAC Appeal would place an undue burden on an already financially stressed applicant.

The following is a summary of the facts for this FRN:

1. Under E-Rate rules, CML bid, selected a vendor, and signed a multi-year agreement with the winning bidder, Time Warner Cable, for services to begin on 7/1/2016. CML filed the Form 471 which included FRN 1699040192 with a requested Total Eligible Pre-Discount Recurring Charges amount of \$134,580.00 and a Funding Commitment Request amount of \$121,122.00 (90 percent discount).
2. As you can see in the USAC Appeal (attached document – USAC Appeal.pdf), the reviewer requested evidence from CML to prove CML was not requesting duplicative services. CML explained this was a transitional year to new circuits with the incumbent service provider, Time Warner Cable, for all 23 branches. Due to Time Warner Cable's determination at the Form 471 posting period that they may not be able to have two of our locations operational by 7/1/2016, CML prepared a contingency FRN (FRN 1699069814) for the two legacy circuits for the three months (7/2016 through 9/2016) they were in use with Time Warner Cable. The reviewer accepted the information and had no further communication with CML for any information or clarification. The Funding Commitment Decision Letter was issued with no comments for the entire requested commitment amount of \$121,122.00; however, the reviewer had erroneously adjusted the Service Start Date for the FRN 1699040192 to 10/1/2016 which affected all 23 circuits. This modification was never communicated to CML and CML received

\$90,841.50 for FRN 1699040192 which represents just nine months of funding for the 23 new circuits.

3. My culpability in this issue is clear— I should have seen and understood the impact of the change in Start Date to 10/1/2016. After reviewing the information provided on the FCDL for the FCDL Comments, Total Eligible Pre-Discount Recurring Charges, and the Funding Commitment Request columns and observing **the amounts were unchanged from our Form 471 (\$134,580 and \$122,122, respectively) and the FCDL Comments column was blank**, I determined the approval of FRN 1699040192 would satisfy our transitional circumstances. I erroneously determined CML would receive the following funding:

- FRN 1699069814 - funding for three months for the two legacy circuits
- FRN 1699040192 - funding for nine months for the 2 new circuits which replaced the legacy circuits (FRN 1699069814) and funding for twelve months for 21 new circuits

4. Without any notification regarding a reduction in funding, CML moved through the Funding Year 2016 ignorant of the impending BEAR Form 472 problem. In October, 2017, CML submitted the BEAR Form 472 for FRN 1699040192 and received the reduced amount of \$90,841.50. Upon investigation, USAC informed me that CML was not eligible for any additional funding for FRN 1699040192 because the Service Start Date had been modified to 10/1/2016.

5. CML filed the attached USAC Appeal in November, 2017. USAC issued the RCFDL on April 17, 2018 which denied the CML appeal. The USAC denial did not address CML's appeal of the BEAR Form, rather USAC denied the CML appeal because it was filed more than 60 days after the date of the Funding Commitment Decision Letter.

Requested Action

CML respectfully requests the following:

1. The FCC reinstate the full funding in the amount of \$121,122.00 for FRN 1699040192.
2. The FCC reset the BEAR Form 472 calendar for FRN 1699040192 to allow CML to file for the remaining \$27,823.50 of funding for FRN 1699040192 which represents three months of the 21 new circuits (July 1, 2016 through September 30, 2016).

The Columbus Metropolitan Library sincerely appreciates the FCC's consideration of this matter.

BEN	BEN Name	Post-Commitment Request Type
129176	COLUMBUS METROPOLITAN LIBRARY	Appeals

Post-Commitment Application/Request Number	FRN	Post-Commitment Decision (FRN Level)
84932	1699040192	Denied

Post-Commitment Rationale (FRN Level)

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 11/23/2017. The Funding Commitment Decision Letter was issued on 12/28/2016.

Original FRN Funding Decision	Revised FRN Funding Decision	RFCDL Comments (FRN Level)
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Funded		
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	Funded	
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FCC Form 471	Service Type	Establishing FCC Form 470	SPIN
161000206	Data Transmission and/or Internet Access	160010538	143048275

Service Provider	Contract Number	Account Number (for SPIN)	Service Start Date
Time Warner Cable Business LLC			01-Oct-2016

Contract Expiration Date (Original)	Contract Award Date
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30-Jun-2021	19-May-2016
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Contract Expiration Date (After Extension Exercised)

Months Of Service In Funding Year

Total Eligible Recurring Charges	Total Eligible One Time Charges	Total Pre-Discount Charges
\$100,935.00	\$0.00	\$100,935.00

Discount Rate	Revised Commitment Amount	Invoice Deadline Date	Wave Number
90.00%	\$90,841.50	08-May-2018	45

Service Delivery Deadline	Consultant Name	CRN	Consultant Employer Name
30-Jun-2017	Greg Spencer	16062188	WGS Consulting

USAC Appeal Narrative

Appealed Form

The Columbus Metropolitan Library (CML BEN – 129176) is appealing the processing of the BEAR Form 472# 2702389 based on contributory negligence with regard to ministerial errors by both CML and USAC, respectively.

On October 24, 2017, I submitted the Form 472 BEAR form for Funding Year 2016 (attached document: Form 472 - TWC – Circuits.pdf) to USAC for payment. On October 30, 2017, CML received an electronic funds transfer in the amount of \$90,841.50 for FRN 1699040192. CML applied for reimbursement in the amount of \$121,122.00 but only received \$90,841.50. My research revealed that for FRN 1699040192 the Service Start Date and Total Eligible Charges had been modified during the PIA review process. **The Service Start Date had been changed from 07/2016 to 10/2016 and the Total Eligible Charges were modified to \$100,935.00.**

Services Background

The Columbus Metropolitan Library (CML) system has 23 locations. For Funding Year 2016, CML signed a new agreement with Time Warner Cable for 23 leased-lit fiber services to serve all library branch locations. Time Warner notified CML that 21 locations would be completed by 07/01/2016 and 2 locations **may not** be completed by the 07/01/2016 Service Start Date, but would be completed no later than 12/31/2016.

The 21 locations were completed and operational on the 07/01/2016 Service Start Date. The remaining 2 locations were completed and operational on a 10/01/2016 Service Start Date. Therefore, 21 locations had 12 months of costs; 2 locations (Northern Lights & Shepard) had 3 months of costs filed under FRN 1699069814 and 9 months of costs filed under FRN 1699040192. Please see the FRN Service Period Graph (attached document: FRN Service Period Graph.pdf)

PIA Review Summary

I received a PIA inquiry (attached document: FY2016-Cat 1 - CML - #161000206 - Review INITIAL Inquiry.pdf) on 11/12/2016 regarding Duplicate Services for our Northern Lights location on FRNs 1699040192 and 1699069814, respectively. Through our response on 11/22/2016 (attached documents: FY2016-Cat 1 - CML - #161000206 - Review Inquiry RESPONSE.pdf and Northern Lights Legacy Circuit Narrative.pdf), I attempted to explain the following:

CML will have a total of 23 circuits for all 12 months of Funding Year 2016:

- 2 circuits for 3 months under the old contract (FRN 1699069814)
- 2 circuits for 9 months under the new contract (FRN 1699040192)
- 21 circuits for 12 months under the new contract (FRN 1699040192)

The total requested funding amount for each FRN is:

FRN 1699040192 - \$121,122.00

FRN 1699069814 - \$ 2,897.21

I received no follow-up requests or communications from the PIA reviewer. At this point, I was awaiting the Funding Commitment Decision Letter.

Funding Commitment Decision Letter Summary

I received the FCDL in Wave 27 on December 28, 2016. The .CSV file (attached document: FCDL – FCC Form 471 – 161000206 - COLUMBUS METROPOLITAN LIBRARY.pdf) displayed the following:

The dollar amounts on the FCDL .CSV file appear as follows:

Total Pre-Discount Charges	Discount Rate	Committed Amount
\$134,580.00	90.00%	\$121,122.00
\$3,219.12	90.00%	\$2,897.21

- There were no comments in the Application FCDL Comments or FCDL Comments columns (Page 5) on the CSV file provided with the Funding Commitment Decision Letter (document attached - FCDL - FCC Form 471 - 161000206 - COLUMBUS METROPOLITAN LIBRARY.pdf).

Based on the reported funding information and the absence of any FCDL Comments on the Funding Commitment Decision Letter, I concluded our funding requests were approved as submitted allowing CML to receive 12 months of funding for 21 new circuits and 9 months of funding for the 2 new circuits installed on 10/1/2016.

Appeal Action Request

I readily admit I am culpable in this situation. However, I believe the PIA reviewer has a responsibility in this situation as well. He did not follow standard operating procedures when modifying an FRN for any reason. I was not made aware of any changes to the FRN's Service Start Date post review either by telephone, email, or FCDL Comment which affected **all 23 leased-lit fiber services**.

I respectfully request USAC restore the Service Start Date on FRN 1699040192 to 07/01/2016 in order for the Columbus Metropolitan Library to continue with the Form 472 BEAR process.

The remaining Total Pre-Discount Charges are calculated as follows:

Total Pre-Discount Charges	\$134,580.00
USAC Reduced Total Eligible Recurring Charges	<u>- \$100,935.00</u>
Remaining Total Eligible Recurring Charges	\$ 33,915.00
Cost Reduction for Two Leased-lit Fiber Services	<u>- \$ 3,000.00***</u>
Remaining Eligible Recurring Charges	<u>\$ 30,915.00</u>

*****(Shepard & Northern Lights cost for the period of 07/01/2016 through 09/30/2016)**

This restoration will allow CML to receive the full 12 months for which funding was requested for 21 locations and 9 months for which funding was requested for 2 locations under FRN 1699040192. CML is an urban library with an approved 90 percent discount rate. This restoration will provide E-Rate Funding in the amount of \$27,823.50.

Thank you for your consideration of this matter.

Attached Document List:

- Exhibit 1 - Form 472 - TWC – Circuits.pdf
- Exhibit 2 - FRN Service Period Graph.pdf
- Exhibit 3 - FY2016-Cat 1 - CML - #161000206 - Review INITIAL Inquiry.pdf
- Exhibit 4 - FY2016-Cat 1 - CML - #161000206 - Review Inquiry RESPONSE.pdf
- Exhibit 5 - Northern Lights Legacy Circuit Narrative.pdf
- Exhibit 6 - FCDL - FCC Form 471 - 161000206 - COLUMBUS METROPOLITAN LIBRARY.pdf

Universal Service for Schools and Libraries

Please read instructions before completing.

(To be completed by schools, libraries, or consortia.)

BILLED ENTITY APPLICANT REIMBURSEMENT FORM

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.
Only one Service Provider Identification Number (SPIN) per form.
Must be completed and signed by the Billed Entity Applicant.

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 54 of the Commission's Rules authorizes the FCC to collect the information on this form. 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 range from 1 to 2 hours 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-PERM, Paperwork Reduction Act Project (3060-0856), 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 FORM 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 3060-0856.

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.

Applicant Form Identifier (Create an identifier for your own reference) TWC - Circuits	FCC Form 472 Invoice # (To be inserted by administrator) 2702389
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BLOCK 1: HEADER INFORMATION

1. Billed Entity Name	COLUMBUS METROPOLITAN LIBRARY
2. Billed Entity Number	129176
3. Service Provider Identification Number (SPIN)	143048275
Applicant FCC Form 498 ID	443012994
4. Contact Name	GREG SPENCER
5. Contact Telephone Number	614- 9895399 ext
6. Total Reimbursement Amount (total from Block 2, Column 14)	\$121,122.00

Billed Entity Applicant Reimbursement Form

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Billed Entity Name COLUMBUS METROPOLITAN LIBRARY Billed Entity Number 129176Contact Name GREG SPENCER Contact Telephone Number 614-9895399Applicant Form Identifier TWC - Circuits**BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER**

	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
	FCC Form 471 Application Number (from Funding Commitment Decision Letter)	Funding Request Number (FRN) (from Funding Commitment Decision Letter)	Bill Frequency	Customer Billed Date (mm/yyyy)	Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	Total (Undiscounted) Amount for Service	Discount Rate	Amount Billed to USAC (Column 12 multiplied by Column 13)
			DO NOT WRITE IN THIS COLUMN.	For each FRN, complete either Column (10) or Column (11), but not both Columns				
1	161000206	1699040192	MONTHLY	7/1/2016		\$134,580.00	90.00	\$121,122.00
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (6)								\$121,122.00

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name COLUMBUS METROPOLITAN LIBRARY

Billed Entity Number 129176

Contact Name GREG SPENCER

Applicant Form Identifier TWC - Circuits

Block 3: Billed Entity Certification

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and I certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in this Billed Entity Applicant Reimbursement Form represent charges for eligible services and/or equipment delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated FCC Form 486.
- B. The discount amounts listed in this Billed Entity Applicant Reimbursement Form were already billed by the Service Provider and paid for by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in this Billed Entity Applicant Reimbursement Form are for eligible services and/or equipment approved by the Fund Administrator pursuant to a Funding Commitment Decision Letter (FCDL).
- D. I acknowledge that I may be audited pursuant to this application and will retain for at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification), after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request any and all records that I rely upon to complete this form.
- E. I certify that, in addition to the foregoing, this Billed Entity Applicant is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

15. Signature of authorized person Signed electronically by PAULA MILLER

16. Date 10/15/2017

17. Printed name of authorized person PAULA MILLER

18. Title or position of authorized person CHIEF FINANCIAL OFFICER

19. Telephone number of authorized person 614- 4793047

20. Address of authorized person 96 SOUTH GRANT AVENUE, 1331 EDGEHILL ROAD, COLUMBUS OH 43215-4702

Time Warner Service Cost Information (FRN 1699040192)

SERVICE PERIOD 07/01/2016 - 06/30/2017

	July	August	September	October	November	December	January	February	March	April	May	June
L Canal Winchester												
I Driving Park												
B Dublin												
R Franklinton												
A Gahanna												
R Hilliard												
Y Hilltop												
Linden												
B Livingston												
R Main Library												
A Marion Franklin												
N Martin Luther King												
C New Albany												
H Northern Lights	NOT YET INSTALLED											
E Northside												
S Parsons												
Reynoldsburg												
Shepard	NOT YET INSTALLED											
South High												
Southeast												
Whetstone												
Whitehall												

Legend

12 Month Service - 21 Library Branches

9 Month Service - 2 Library Branches

Duplicate Services

Issue

USAC's Program Integrity Assurance (PIA) team is currently reviewing your FCC Form 471 application, and we have identified an issue that we need you to help us resolve.

What is the issue?

On your form, you requested funding on FRN 1699040192, which appears to be a request for the same service as FRN 1699069814. This is an issue because duplicative services, which are defined as services that deliver the same functionality to the same population in the same location during the same period of time, are ineligible to receive E-rate funding.

Before we can progress with processing your application, PIA needs to ensure that your requests do not include duplicative services. (For reference, please read USAC's information on duplicative services at <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>).

You have NORTHERN LIGHTS BRANCH LIBRARY receiving duplicate services on the two above mentioned FRN's. The same library cannot receive similar or duplicative services. Please review your funding request and make the appropriate changes and respond back to the this inquiry as soon as possible.

Please read all of the questions, descriptions, and requests below. Please give enough detail, insight, and clarity to help the reviewers fully understand your specific situation.

Check the boxes for statements that apply, and where applicable, type the information requested into the text boxes. If your information is too detailed for the text box, or if you need to provide additional documentation, click "Browse" to upload relevant files or documentation.

Question(s)

This page will timeout after an extended period of inactivity. Please periodically save your work using the 'Save & Close' button below. You may then use your browser's 'Back' button to return to your work.

Your response to PIA's questions:

#	Question	Response
1	Are the funding requests mentioned above providing duplicative services?	
a	If Yes, please provide one of the following:	---
	Please send us written authorization to cancel the FRN that is providing duplicative services. In your written reply, please specify which funding request you wish to cancel.	
	Please send us written authorization to remove the FRN line item that is providing duplicative services. In your written reply, please specify which funding request line item you wish to remove.	
b	If No, please provide all of the following:.	---
	Please provide third-party documentation verifying that the requests are not duplicates such as bills or signed copies of contracts verifying different services being delivered, applicant's statement in writing that FRNs are for different locations or other detailed information specifying the recipients of service and/or types of services being provided.	
	Please provide a written explanation as to why these FRNs are not duplicates.	
2	If you would like to provide any additional information about these issues that have not been addressed above: Use the text box to type information, or upload additional documentation using the "Browse" button.	

CLOSE

Duplicate Services*Issue*

USAC's Program Integrity Assurance (PIA) team is currently reviewing your FCC Form 471 application, and we have identified an issue that we need you to help us resolve.

What is the issue?

On your form, you requested funding on FRN 1699040192, which appears to be a request for the same service as FRN 1699069814. This is an issue because duplicative services, which are defined as services that deliver the same functionality to the same population in the same location during the same period of time, are ineligible to receive E-rate funding.

Before we can progress with processing your application, PIA needs to ensure that your requests do not include duplicative services. (For reference, please read USAC's information on duplicative services at <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>).

You have NORTHERN LIGHTS BRANCH LIBRARY receiving duplicate services on the two above mentioned FRN's. The same library cannot receive similar or duplicative services. Please review your funding request and make the appropriate changes and respond back to the this inquiry as soon as possible.

Please read all of the questions, descriptions, and requests below. Please give enough detail, insight, and clarity to help the reviewers fully understand your specific situation.

Check the boxes for statements that apply, and where applicable, type the information requested into the text boxes. If your information is too detailed for the text box, or if you need to provide additional documentation, click "Browse" to upload relevant files or documentation.

Question(s)

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Your response to PIA's questions:

#	Question	Response
1	Are the funding requests mentioned above providing duplicative services?	No
a	If Yes, please provide one of the following:	---
	Please send us written authorization to cancel the FRN that is providing duplicative services. In your written reply, please specify which funding request you wish to cancel.	
	Please send us written authorization to remove the FRN line item that is providing duplicative services. In your written reply, please specify which funding request line item you wish to remove.	
b	If No, please provide all of the following:.	---
	Please provide third-party documentation verifying that the requests are not duplicates such as bills or signed copies of contracts verifying different services being delivered, applicant's statement in writing that FRNs are for different locations or other detailed information specifying the recipients of service and/or types of services being provided.	Northern Lights Legacy Circuit Narrative.docx
	Please provide a written explanation as to why these FRNs are not duplicates.	Monthly data communications for two locations as we transition to our new Time Warner Cable connections. These two circuits were de-installed by 9/30/2016 giving CML 3 months of service for FRN 1699069814.
2	If you would like to provide any additional information about these issues that have not been addressed above: Use the text box to type information, or upload additional documentation using the "Browse" button.	This FRN configuration, legacy (1699069814) and new (1699040192), have been the typical FRN configuration for mid-year circuit replacements since the inception of the E-Rate program.

CLOSE

The Columbus Metropolitan Library system (CML) selected Time Warner as their service provider for data transmission services for all locations (see FRN 1699040192). The installation for the Northern Lights Branch (BEN 46437) could not be completed by July 1, 2016. Therefore, it was necessary to file an additional FRN (see FRN 1699069814) as a month-to-month cost for the Northern Lights Branch in order to receive funding for the portion of costs for the legacy circuit. FRN 1699069814 was for circuit costs between the period of 7/1/2016 and 12/31/2016 or as soon as the legacy Northern Lights Branch circuit was disconnected, whichever is the lesser time frame. For example, if the legacy circuit is disconnected on 12/1/2016, then CML will have legacy costs for 5 months and new circuit costs for 7 months for its Northern Lights Branch.

BEN	BEN_NAME	FRN	FCC Form 471	Status	Service Type
129176	COLUMBUS METROPOLITAN LIBRARY	1699040192	161000206	Funded	Data Transmission and/or Internet Access
129176	COLUMBUS METROPOLITAN LIBRARY	1699069814	161000206	Funded	Data Transmission and/or Internet Access

Establishing FCC Form 470	SPIN	Service Provider	Contract Number
160010538	143048275	Time Warner Cable Business LLC	
160010538	143048275	Time Warner Cable Business LLC	

Account Number	Service Start Date	Contract Expiration Date	Award Date	Expiration Date (All Extensions)
	10/1/16	6/30/21	5/19/16	
7196030-01	7/1/16	9/30/16		

Months Of Service In Funding Year	Total Eligible Recurring Charges	Total Eligible One Time Charges	Total Pre-Discount Charges
9	\$100,935.00	\$0.00	\$134,580.00
3	\$1,609.56	\$0.00	\$3,219.12

Discount Rate	Committed Amount	Application FCDL Comments	FCDL Comments	Wave Number
90.00%	\$121,122.00			27
90.00%	\$2,897.21			27

Last Allowable Date For One Time Services	Consultant Name	CRN	Consultant Employer Name
9/30/17	Greg Spencer	16062188	WGS Consulting
9/30/17	Greg Spencer	16062188	WGS Consulting