

# Appeal/Waiver Request

CC Docket # 02-6

Applicant Name: **Recovery School District**

Entity Number: **16063831**

Funding Year: 2011-2012

## CONTACT INFORMATION

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## APPLICANT INFORMATION

Appellant Name: Carol Mosley

Applicant Name: Recovery School District

BEN: 16042306

Application #: 821130

**This is a request for a Waiver/Appeal of the USAC Audit  
finding to seek recovery of improperly disbursed funds from  
the applicant  
Recovery School District**

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### Waiver/Appeal Request Detail:

**Funding Year 2012 Form 471 Number: 821130**

Funding Request Number: **2235911**

**TOTAL Dollar Amount: \$42,514.00**

Service Provider Name: Bellsouth Telecommunications LLC

Service Provider Identification Number: 143004824

### Reason for Recovery of Funds from Applicant:

The audit firm identified the payments requested by the Recovery School District for telecommunication services provided under FRN 2235911 were not substantiated by the invoices submitted for payment.

**Rationale for Request:**

In an effort to submit accurate invoices to USAC for services rendered by Bellsouth Communications related to FRN 2235911, Bellsouth and the Recovery School District held multiple meeting to adjust the invoices to reflect the services received as the services for this FRN as well as other FRNs were spread across multiple billing accounts and invoices. The invoices selected in the audit were only a portion of the total invoices that were paid and then submitted for reimbursement. The Recovery School District submitted invoices under the Bellsouth account number 504-M01-3977-977 which clarified the correct billing for subaccounts 504-MO1-1891 001 and 504-MO1-1890 001 as well as account number 831-000-2580 632 with sub accounts of 831-000-25800637 which should have also been included for substantiating the invoiced amount.

**Process that Lead To The Error**

Under FRN 2235911, the Recovery School District was establishing a point to point connection between its main data center located in New Orleans, LA and one of its school sites, located across the state in Greensburg , LA. These two entities are located in different Bellsouth local access transport areas (LATA) which necessitated separate billing accounts for the single end-to-end connection. In addition, because these were located in different areas, the installation and “turn-up” of services for each end of the circuit happened on different schedules. The Recovery School District held multiple meetings with Bellsouth Telecommunications, LLC related to multiple billing disputes regarding these circuits and the services being both functionally available for actual use versus being “turned-on” for solely billing purposes. This led to Bellsouth Telecommunications, LLC creating new accounts for which “cleaner” versions of the invoices would reflect credits and charges based on the dispute resolution meetings. These changes and multiple invoices and account numbers made the process of billing, reconciling and filing very difficult and confusing for both the applicant as well as the auditors.

**Circumstances to Consider**

- The Recovery School District has copies of the invoice and services which align to their FRN request for services.
- The invoices under Bellsouth account number 831-000-2580 632 with sub accounts of 831-000-25800637 for the circuit installed at LB Landry which served as the Recovery School District’s data center were not included in the audit finding for substantiating the original invoice claim.
- The invoices under Bellsouth account number 504-M01-3977-977 for the St Helena side of the connection totaled \$13,682.34 of which only \$2,170 associated with the subaccounts 504-MO1-1891 001 and 504-MO1-1890 001 were used to substantiate the funding request.

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This request is made on behalf of the Billed Entity for a Waiver/appeal to be granted. By granting this Waiver/Appeal, USAC could be directed to review the additional invoices as support and documentation of the Recovery School Districts reimbursement request and amend its audit finding for FRN 2235911 to reflect the additional invoices which were used to substantiate the funding received by the Recovery School District.

Your favorable consideration in this matter is greatly appreciated.

Carol Mosley  
E-Rate Support for Recovery School District  
225-588-5584