

**REQUEST FOR WAIVER
OF GRAPEVINE-COLLEYVILLE INDEPENDENT SCHOOL DISTRICT**

June 25, 2018

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket No. 02-6
Request for Waiver of Grapevine-Colleyville Independent School District,
BEN: 140860; FY2018, Form 471 #181024746

Dear Ms. Dortch:

On behalf of Grapevine-Colleyville Independent School District (GCISD), I am respectfully requesting a waiver of section 54.504(a) of the Commission's rules. GCISD inadvertently cancelled a funding request, as further described below. The Commission has granted waivers when applicants inadvertently cancelled their funding requests, and we respectfully request that the Commission do so here as well.

GCISD submitted FCC Form 471 #181024746 for E-rate FY2018 on March 14, 2018, with two funding requests. Funding Request Number 1899044935 was submitted for its Wide Area Network and the service provider was Time Warner Cable.¹ Funding Request Number 1899044958 was submitted for its Internet Access Service and the service provider was Zayo Group.²

GCISD then received a review inquiry asking for contract extension information for the Wide Area Network (FRN 1899044935).³ The District mistakenly thought the review inquiry concerned FRN 1899044958 (the contract with Zayo Group), rather than FRN 1899044935 (the contract with Time Warner).

GCISD had planned to cancel the Zayo Group funding request because the District elected to take service via the Educational Services Center Region 11 Consortium contract for Internet access services but had not yet had the opportunity to cancel the request when it received the PIA inquiry. Operating under the mistaken assumption the inquiry was regarding the FRN for the Zayo Group services, GCISD erroneously informed the reviewer that it was cancelling its service with Zayo Group and that the reviewer could cancel the FRN.

¹ See Exhibit 1, at page 4.

² See Exhibit 1, at page 16.

³ See Exhibit 2.

The applicant is respectfully requesting a waiver in order to reinstate FRN 1899044935 and to instead cancel FRN 1899044958.⁴ FRN 1899044935 requests \$143,472 in funding.

Any of the Commission's rules may be waived if good cause is shown.⁵ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.⁶ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁷

The Commission has granted waiver requests when applicants did not intend to cancel their funding requests.⁸ In a Bureau order, applicants cancelled their funding requests by accident and the Bureau found that such a minor error should not result in the rejection of the applicants' funding requests.⁹

Further, as the Bureau's order noted, this waiver request is consistent with the Commission's decision in its *Bishop Perry Order*. In that order, the Commission allowed applicants to correct ministerial and clerical errors made on their FCC forms.¹⁰ Here, this error was of the type that USAC could have corrected had the applicant noted the error before the funding commitment

⁴ A copy of the Time Warner Contract Renewal is attached as Exhibit 3. The contract was originally signed in FY2016 and renewed in FY2017 and FY2018.

⁵ 47 C.F.R. § 1.3.

⁶ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (Northeast Cellular).

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁸ *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Joseph Jingoli & Son, Inc., et al.; Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-475364, et al., CC Docket No. 02-6, Order, DA 07-4471, at para. 3 (WCB 2007) (granting Petitioners' requests for review of USAC's decisions to deny them E-rate funding on the grounds that Petitioners sought to cancel their funding requests where Petitioners either sought cancellation in error, contend they never sought cancellation, or allege a staffing problem caused a cancellation of the funding request).

⁹ *Id.* at ¶ 4.

¹⁰ See *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, et al., Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, FCC 06-54, 21 FCC Rcd 5316, 5326-27 ¶¶ 22-23 (2006) (directing USAC to provide applicants with an opportunity to cure ministerial and clerical errors on the FCC Forms that they submit to USAC); *Requests for Review of Decisions of the Universal Service Administrator by Archer Public Library et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 23 FCC Rcd 15518 (Wireline Comp. Bur. 2008); *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ann Arbor Public Schools et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 25 FCC Rcd 17319 (Wireline Comp. Bur. 2010); *Request for Waiver and Review of Decisions of the Universal Service Administrator by Erie I BOCES et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 28 FCC Rcd 13381 (Wireline Comp. Bur. 2013) (Erie I BOCES Order) (granting appeals and petitions for reconsideration from petitioners seeking a waiver of the Commission's E-rate rules in order to correct ministerial or clerical errors on petitioners' E-rate applications or associated forms).

decision letter was issued.¹¹ Similar to the “accidental omission of FRNs from the FCC Form 471,” here, we accidentally identified the wrong FRN to cancel. Unfortunately, however, GCISD did not notice the error until after the FCDL was issued and so USAC no longer has the authority to make the correction; hence GCISD is now filing this waiver request.

Because the Bureau has granted numerous waiver requests of this type, we respectfully request that the Bureau grant this waiver request as well.

/s/ Russell Neal

Russell Neal, CEMP
VST Services, LP
905 Trophy Club Drive # 202
Trophy Club, TX 76262
682-237-7670
rneal@vstservices.com

¹¹ <http://www.usac.org/sl/applicants/step01/clerical-errors.aspx>.

Exhibit 1



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname GCISD - FY 2018 Category 1 - WAN & IA **Application Number** 181024746
Funding Year 2018 **Category of Service** Category 1

Billed Entity

GRAPEVINE-COLLEYVILLE IND S D
3051 W HIGHWAY 26 GRAPEVINE TX 76051 - 38
17
817-251-5200
rneal@vstservices.com

Contact Information

Russell Neal
682-237-7670
rneal@vstservices.com

Billed Entity Number 140860
FCC Registration Number 0001647809
Applicant Type School District

Holiday/Summer Contact Information Russell Neal / 682-237-7670

Consulting Firms

Name	Consultant Registration Number	City	State	Zip Code	Phone Number	Email
VST Services LP	16043688	Trophy Club	TX	76262	682-237-7670	RNeal@vstservices.com

Entity Information

School District Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	School District Attributes	Endowment
140860	GRAPEVINE-COLLEYVILLE IND S D	Urban	220906	220906		Public School District	None

Related Entity Information

Related Child School Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
87251	BRANSFORD ELEMENTARY SCHOOL	Urban	220906	220906108	48 - 21660-5405	None	Public School	None

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
87252	O C TAYLOR ELEMENTARY SCHOOL	Urban	220906	220906105	48 - 21660- 6266	None	Public School	None
87253	GLENHOPE ELEMENTARY	Urban	220906	220906111	48 - 21660- 7118	None	Public School	None
87254	HERITAGE MIDDLE SCHOOL	Urban	220906	220906043	48 - 21660- 6858	None	Public School	None
87255	COLLEYVILLE HERITAGE HIGH SCH	Urban	220906	220906004	48 - 21660- 7439	None	Public School	None
87256	COLLEYVILLE MIDDLE SCHOOL	Urban	220906	220906042	48 - 21660- 2181	None	Public School	None
87257	COLLEYVILLE ELEMENTARY SCHOOL	Urban	220906	220906102	48 - 21660- 2180	None	Public School	None
87265	BEAR CREEK ELEMENTARY SCHOOL	Urban	220906	220906106	48 - 21660- 6556	None	Public School	None
87300	DOVE ELEMENTARY SCHOOL	Urban	220906	220906103	48 - 21660- 2182	None	Public School	None
87301	SILVER LAKE ELEMENTARY	Urban	220906	220906110	48 - 21660- 7117	None	Public School	None
87303	GRAPEVINE MIDDLE SCHOOL	Urban	220906	220906041	48 - 21660- 5737	None	Public School	None
87304	TIMBERLINE ELEMENTARY SCHOOL	Urban	220906	220906104	48 - 21660- 5484	None	Public School	None
87305	CROSS TIMBER MIDDLE SCHOOL	Urban	220906	220906044	48 - 21660- 7440	None	Public School	None
87306	GRAPEVINE ELEMENTARY SCHOOL	Urban	220906	220906109	48 - 21660- 7070	None	Public School	None
87307	HERITAGE ELEMENTARY SCHOOL	Urban	220906	220906107	48 - 21660- 21500	None	Public School	None
87308	GRAPEVINE HIGH SCHOOL	Urban	220906	220906001	48 - 21660- 2183	None	Public School	None
211351	CANNON ELEMENTARY	Urban	220906	220906101	48 - 21660- 5736	None	Public School	None
214709	THE BRIDGES ACAD ALTER	Urban	220906	220906006	48 - 21660- 7116	None	Public School	None
17013665	Grapevine-Colleyville Collegiate Academy at TCC NE	Urban				None	Public School	None
17013666	Grapevine-Colleyville IUNIVERSITY PREP	Urban				None	Public School	None

Related Child School Entity - Discount Rate Calculation Details

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
87251	BRANSFORD ELEMENTARY SCHOOL	Urban	474	N/A	
87252	O C TAYLOR ELEMENTARY SCHOOL	Urban	490	N/A	
87253	GLENHOPE ELEMENTARY	Urban	493	N/A	
87254	HERITAGE MIDDLE SCHOOL	Urban	849	N/A	
87255	COLLEYVILLE HERITAGE HIGH SCH	Urban	2000	N/A	
87256	COLLEYVILLE MIDDLE SCHOOL	Urban	658	N/A	
87257	COLLEYVILLE ELEMENTARY SCHOOL	Urban	470	N/A	
87265	BEAR CREEK ELEMENTARY SCHOOL	Urban	704	N/A	
87300	DOVE ELEMENTARY SCHOOL	Urban	494	N/A	
87301	SILVER LAKE ELEMENTARY	Urban	601	N/A	

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
87303	GRAPEVINE MIDDLE SCHOOL	Urban	764	N/A	
87304	TIMBERLINE ELEMENTARY SCHOOL	Urban	704	N/A	
87305	CROSS TIMBER MIDDLE SCHOOL	Urban	850	N/A	
87306	GRAPEVINE ELEMENTARY SCHOOL	Urban	525	N/A	
87307	HERITAGE ELEMENTARY SCHOOL	Urban	476	N/A	
87308	GRAPEVINE HIGH SCHOOL	Urban	1855	N/A	
211351	CANNON ELEMENTARY	Urban	578	N/A	
214709	THE BRIDGES ACAD ALTER	Urban	43	N/A	
17013665	Grapevine-Colleyville Collegiate Academy at TCC NE	Urban	325	N/A	
17013666	Grapevine-Colleyville IUNIVERSITY PREP	Urban	605	N/A	

Related School District NIFs

School District BEN	School District Name	NIF BEN	NIF Name
140860	GRAPEVINE-COLLEYVILLE IND S D	16077211	ADMINISTRATION

Discount Rate

School District Enrollment	School District NSLP Count	School District NSLP Percentage	School District Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
13958	3145	23.0%	Urban	50%	50%	0%

[Funding Request for FRN #1899044935](#)

Funding Request Nickname: Spectrum - WAN Services - FY 2018

Service Type: Data Transmission and/or Internet Access

What is the FRN number from the previous year ? 1799074633

Agreement Information - Contract

Contract Number		Account Number	
Establishing FCC Form 470	160026244	Service Provider	Time Warner Cable Business LLC (SPN: 143048275)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	April 29, 2016	Based on a multiple award schedule?	No
How many bids were received for this contract?	1	Includes Voluntary Extensions?	No
What is the service start date?	July 01, 2018	Remaining Voluntary Extensions	
		Total Remaining Contract Length	
		What is the date your contract expires for the current term of the contract?	June 30, 2020

Document Name	Document Description
TIME WARNER WAN CONTRACT , LETTER. PO EXP 6-30-2020.pdf	

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative WAN SERVICE for GCISD Eligible Entities

Line Item # 1899044935.001

Product and Service Details

Purpose

Function

Type of Connection

Bandwidth Speed

Data Connection between two or more sites entirely within the applicant's network

Fiber

Ethernet

Upload Speed

10.0 Gbps

Download Speed

10.0 Gbps

Connection Information

Does this include firewall services?

No

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a "Wide area network")?

Yes

Is this a direct connection to a single school, library or a NIF for Internet access?

No

Cost Calculation for FRN Line Item # 1899044935.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$2,500.00	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$2,500.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 2	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$5,000.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$60,000.00	Total Eligible Recurring Costs	\$60,000.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$60,000.00

Recipients of Services

BEN	Name
16077211	ADMINISTRATION

Line Item # 1899044935.002

Product and Service Details

Purpose

Function

Type of Connection

Bandwidth Speed

Data Connection between two or more sites entirely within the applicant's network

Fiber

Ethernet

Upload Speed

Download Speed

10.0 Gbps

10.0 Gbps

Connection Information

Does this include firewall services?

No

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a "Wide area network")?

Yes

Is this a direct connection to a single school, library or a NIF for Internet access?

No

Cost Calculation for FRN Line Item # 1899044935.002

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$1,806.00	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$1,806.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$1,806.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$21,672.00	Total Eligible Recurring Costs	\$21,672.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$21,672.00

Recipients of Services

BEN	Name
87255	COLLEYVILLE HERITAGE HIGH SCH

Line Item # 1899044935.003

Product and Service Details

Purpose Data Connection between two or more sites entirely within the applicant’s network

Function Fiber
Type of Connection Ethernet

Bandwidth Speed

Upload Speed 10.0 Gbps Download Speed 10.0 Gbps

Connection Information

Does this include firewall services? No Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)? Yes
Is this a direct connection to a single school, library or a NIF for Internet access? No

Cost Calculation for FRN Line Item # 1899044935.003

Monthly Cost	
Monthly Recurring Unit Cost	\$2,500.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$2,500.00
Monthly Quantity	x 1
Total Monthly Eligible Recurring Costs	= \$2,500.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$30,000.00

One-Time Cost	
One-time Unit Cost	\$0.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$0.00
One-time Quantity	x 0
Total Eligible One-time Costs	= \$0.00
Summary	
Total Eligible Recurring Costs	\$30,000.00
Total Eligible One-time Costs	+ \$0.00
Pre-Discout Extended Eligible Line Item Cost	= \$30,000.00

Recipients of Services

BEN	Name
87255	COLLEYVILLE HERITAGE HIGH SCH

Line Item # 1899044935.004

Product and Service Details

Purpose		Data Connection between two or more sites entirely within the applicant's network	
Function	Fiber		
Type of Connection	Ethernet		
Bandwidth Speed			
Upload Speed	10.0 Gbps	Download Speed	10.0 Gbps

Connection Information

Does this include firewall services?	No	Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a "Wide area network")?	Yes
Is this a direct connection to a single school, library or a NIF for Internet access?	No		

Cost Calculation for FRN Line Item # 1899044935.004

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$1,806.00	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$1,806.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$1,806.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$21,672.00	Total Eligible Recurring Costs	\$21,672.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$21,672.00

Recipients of Services

BEN	Name
87308	GRAPEVINE HIGH SCHOOL

Line Item # 1899044935.005

Product and Service Details

Purpose

Function

Type of Connection

Bandwidth Speed

Data Connection between two or more sites entirely within the applicant's network

Fiber

Ethernet

Upload Speed

Download Speed

1.0 Gbps

1.0 Gbps

Connection Information

Does this include firewall services?

No

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a "Wide area network")?

Yes

Is this a direct connection to a single school, library or a NIF for Internet access?

No

Cost Calculation for FRN Line Item # 1899044935.005

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$800.00	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$800.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 16	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$12,800.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$153,600.00	Total Eligible Recurring Costs	\$153,600.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$153,600.00

Recipients of Services

BEN	Name
87251	BRANSFORD ELEMENTARY SCHOOL
87252	O C TAYLOR ELEMENTARY SCHOOL
87253	GLENHOPE ELEMENTARY
87254	HERITAGE MIDDLE SCHOOL
87256	COLLEYVILLE MIDDLE SCHOOL
87257	COLLEYVILLE ELEMENTARY SCHOOL
87265	BEAR CREEK ELEMENTARY SCHOOL
87300	DOVE ELEMENTARY SCHOOL
87301	SILVER LAKE ELEMENTARY
87303	GRAPEVINE MIDDLE SCHOOL
87304	TIMBERLINE ELEMENTARY SCHOOL
87305	CROSS TIMBER MIDDLE SCHOOL
87306	GRAPEVINE ELEMENTARY SCHOOL
87307	HERITAGE ELEMENTARY SCHOOL
211351	CANNON ELEMENTARY
214709	THE BRIDGES ACAD ALTER

FRN Calculation for FRN #1899044935

Monthly Charges	
Total Monthly Recurring Charges	\$23,912.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$23,912.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$286,944.00

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$286,944.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$286,944.00
Discount Rate	50%
Funding Commitment Request	= \$143,472.00

[Funding Request for FRN #1899044958](#)

Funding Request Nickname: Zayo - Internet Access

Service Type: Data Transmission and/or Internet Access

Agreement Information - Contract

Contract Number	622003	Account Number	622003
Establishing FCC Form 470	160004283	Service Provider	Zayo Group, LLC (SPN: 143023855)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	April 21, 2016	Based on a multiple award schedule?	No
How many bids were received for this contract?	5	Includes Voluntary Extensions?	Yes
What is the service start date?	July 01, 2018	Remaining Voluntary Extensions	3
		Total Remaining Contract Length	60
		What is the date your contract expires for the current term of the contract?	June 30, 2019

Document Name	Document Description
ZAYO Contract Service Schedule Service Order Form 622003.pdf	Master Purchase Agreement, Service Schedule, and Service Order Form 622003. Initial Term is two years + Three One Year Voluntary Extensions.

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative INTERNET ACCESS

Line Item # 1899044958.001

Product and Service Details

Purpose		Internet access service that includes a connection from any applicant site directly to the Internet Service Provider	
Function	Fiber		
Type of Connection	Ethernet		
Bandwidth Speed			
Upload Speed	10.0 Gbps	Download Speed	10.0 Gbps

Connection Information

Does this include firewall services?	No	Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)?	No
Is this a direct connection to a single school, library or a NIF for Internet access?	Yes		

Cost Calculation for FRN Line Item # 1899044958.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$6,100.00	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$6,100.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$6,100.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$73,200.00	Total Eligible Recurring Costs	\$73,200.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$73,200.00

Recipients of Services

BEN	Name
87251	BRANSFORD ELEMENTARY SCHOOL
214709	THE BRIDGES ACAD ALTER
211351	CANNON ELEMENTARY
87308	GRAPEVINE HIGH SCHOOL
87307	HERITAGE ELEMENTARY SCHOOL
87306	GRAPEVINE ELEMENTARY SCHOOL
87305	CROSS TIMBER MIDDLE SCHOOL
87304	TIMBERLINE ELEMENTARY SCHOOL
87303	GRAPEVINE MIDDLE SCHOOL
87301	SILVER LAKE ELEMENTARY
87300	DOVE ELEMENTARY SCHOOL
87265	BEAR CREEK ELEMENTARY SCHOOL
87257	COLLEYVILLE ELEMENTARY SCHOOL
87256	COLLEYVILLE MIDDLE SCHOOL
87255	COLLEYVILLE HERITAGE HIGH SCH
87254	HERITAGE MIDDLE SCHOOL
87253	GLENHOPE ELEMENTARY
87252	O C TAYLOR ELEMENTARY SCHOOL
16077211	ADMINISTRATION
17013665	Grapevine-Colleyville Collegiate Academy at TCC NE
17013666	Grapevine-Colleyville IUNIVERSITY PREP

FRN Calculation for FRN #1899044958

Monthly Charges	
Total Monthly Recurring Charges	\$6,100.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$6,100.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$73,200.00

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$73,200.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$73,200.00
Discount Rate	50%
Funding Commitment Request	= \$36,600.00

Connectivity Questions

District/System-wide Internet Access Questions

Does your school district currently aggregate Internet access for the entire district(as opposed to buying Yes Internet access on a building-by-building basis)?

Download Speed 1200.00 **Download Speed Units** Mbps

Upload Speed 1200.00 **Upload Speed Units** Mbps

Per Entity Basis Questions

Entity Name GRAPEVINE-COLLEYVILLE IND S D **Entity Number** 140860

BEN	Entity Name	Download	Units	Upload	Units	Connection	Wifi Sufficient	Barriers to Robust Network
87251	BRANSFORD ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87252	O C TAYLOR ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87253	GLENHOPE ELEMENTARY	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87254	HERITAGE MIDDLE SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87255	COLLEYVILLE HERITAGE HIGH SCH	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87256	COLLEYVILLE MIDDLE SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87257	COLLEYVILLE ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87265	BEAR CREEK ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87300	DOVE ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87301	SILVER LAKE ELEMENTARY	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87303	GRAPEVINE MIDDLE SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87304	TIMBERLINE ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87305	CROSS TIMBER MIDDLE SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87306	GRAPEVINE ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87307	HERITAGE ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
87308	GRAPEVINE HIGH SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
211351	CANNON ELEMENTARY	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
214709	THE BRIDGES ACAD ALTER	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
17013665	Grapevine-Colleyville Collegiate Academy at TCC NE	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
17013666	Grapevine-Colleyville IUNIVERSITY PREP	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	\$360,144.00
Total funding commitment request amount on this FCC Form 471	\$180,072.00
Total applicant non-discount share of the eligible amount	\$180,072.00
Total budgeted amount allocated to resources not eligible for E-rate support	\$1,441,769.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$1,621,841.00
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share?	No

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service

discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

Title:	CEMP	Name:	Russell Neal
Phone:	682-237-7670	Email:	rneal_old@vstservices.com
Address:	100 N. UNIVERSITY DRIVE FORT WORTH TX 76107 - 1360	Employer:	Russell Neal

Certified Timestamp

14-Mar-2018 16:43:45 EDT

Exhibit 2

APPLY SUMMER OR WINTER DEF...

Related Actions

Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date	Due Date	Extn.	Status
------	--------	------	---------------	-------------	-------	---------	---------------	----------	-------	--------

Submitted Inquiries

Name	Outreach Type	Answered By	Assigned Date	Answered Date
28-Day Waiting Period / Contract or Legally Binding Agreement Review	Regular 15-Day	Russell Neal	4/11/2018 10:10 AM EDT	4/18/2018 12:30 PM EDT

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 entered a Contract Expiration Date (CED) for this year's Funding Request Number (FRN) 1899044935 that is different than the CED that appears on your prior funding year FRN 1799074633.

Before we can proceed with processing your application, PIA needs to ensure that you competitively bid the contract referenced and that the contract expiration complies with program rules. (For reference, please read USAC's information on contracts at <http://usac.org/sli/applicants/step02/contracts.aspx>).

Current FY FRN and CED	Prior FY FRN and CED
6/30/2020	6/30/2018

Question(s)

These are my responses:

#	Question	Response
1	Is the new CED listed for the current year's FRN correct?	No
a	If No, and the Contract Expiration Date did not change, we intend to modify the Contract Expiration Date to 6/30/2018.	<input type="checkbox"/>
	You have no further questions.	

Exhibit 3

Grapevine★Colleyville
Independent School District

March 12, 2018

Spectrum Corporation

To Whom it May Concern:

In accordance with the terms of our service agreement with TWC/Spectrum, Grapevine-Colleyville ISD wishes to exercise its agreed upon option for year to year WAN service for fiscal year 2018-2019. A Purchase Order will be issued on July 1, 2018 to cover service beginning July 1, 2018 through June 30, 2019.

If anything further is needed, please let us know.

Thank you,



DaiAnn Mooney
Chief Financial Officer

Financial Services Department
3051 Ira E. Woods Avenue
Grapevine, TX 76051



P: 817.251.5580 F: 817.424.3138
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