

Sir/Ma'am –

Moore Public Schools received our funding commitment letter from USAC on the purchase and installation of Huawei switches and access points for FY19. We will not begin installation until 2019-2020 bond funds become available, late April of 2019. There are a lot of questions but the most impactful are as follows along with my opinion.

Concern with the proposed rule changes if they come into effect:

- 1) If I have not physically installed the equipment, will I be denied funding or go back through a bid process?
 - a. Opinion:
 - i. If I have received approval, whether or not they are physically installed or an extension is requested, USAC /FCC should fund (or continue to fund) through completion.
 - ii. If FCC has provided a list prior to the FY19 bid submission and /or evaluation, this would not be an issue.
 - iii. If forced to make last minute change, I should not have to go through the entire bid process and accept the next acceptable bid
- 2) If during the next year's bid, we ask for funding for maintenance or additional equipment from Huawei, will we be denied funding?
 - a. Opinion:
 - i. If we have received approval for the equipment, funding from USAC /FCC should continue through the life of the equipment previously approved.
 - ii. If we have received approval for the equipment, funding from USAC /FCC should continue to approve modules or access points to ensure individual sites do not have a mix of equipment until the bulk the equipment can be replaced.
 1. Example: installed in 2019-2020, we should be allowed to use remaining USAC funds to purchase additional access points to increase coverage.
 2. Example: if this is not allowed, we could end up with two different types of equipment at a single site. This causes configuration and maintenance issues for sites.
- 3) USAC allows for service substitutions. But this situation is not addressed. If fact, my next substitution is higher in cost thus cost MPS more out of pocket.
 - a. Opinion:
 - i. Waiver should be granted and fund the next substitution accordingly without penalty to the district for the full eligible percentage. 60% for MPS

Thank you for your time and consideration.

Respectfully,

Jun Kim, Director of Technology
Moore Public Schools