

July 18, 2018

SUBMITTED VIA ECFS

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

RE: CC Docket No. 02-6; Request for Waiver

Dear Ms. Dortch:

On behalf of Texarkana Independent School District (BEN: 140638), VST Services, LP hereby requests a waiver of the Funding Year 2018 FCC Form 471 filing window for Application #181042618, certified on April 18, 2018. VST also asks that the Bureau waive the 60-day deadline for filing a request for waiver with the Commission.

Background

In November 2017, Anita Clay became the Executive Director of Business Operations for the Texarkana Independent School District, a position that includes responsibility for E-rate. Prior to coming to Texarkana, Ms. Clay had never worked on E-rate, and her predecessor left her no guidance regarding upcoming deadlines. USAC's last E-rate training for funding year 2018 was on November 14, 2017, so Ms. Clay did not have an opportunity to attend a training.

Ms. Clay's predecessor had completed the FCC Form 470 before leaving, so the FCC Form 471 for Funding Year 2018 was the first E-rate deadline that Ms. Clay faced. Having received no instructions from her predecessor, Ms. Clay researched the deadline and requirements. But because she did not receive it directly from USAC and did not know to look for it, she did not see USAC's announcement of the Funding Year 2018 filing window. Ms. Clay mistakenly concluded that the filing deadline for 2018 would be in May, as it had been in the previous funding year. In fact, USAC had announced in December 2017 that the FCC Form 471 was due by March 22, 2018.¹

Believing that the FCC Form 471 filing deadline was in May, in late March Ms. Clay contacted VST as she hoped to hire a consultant to help with the filing. By that time, however, the March 22 filing deadline had already passed. VST completed Texarkana's FCC Form 471 as quickly as possible and filed it on April 18, 2018—27 days after the filing window had closed.²

¹ See "E-rate Funding Year 2018 Application Filing Window Opens January 11, 2018," *USAC Schools and Libraries News Brief*, <https://www.usac.org/sl/tools/news-briefs/preview.aspx?id=808> (Dec. 14, 2017) (USAC 2018 Filing Window Announcement).

² Exhibit 1, Texarkana FY 2018 FCC Form 471.

Request for Waiver

VST respectfully asks that the Bureau waive the FCC Form 471 filing deadline. Texarkana missed the deadline not due to negligence or carelessness, but simply because of a good-faith belief that the deadline would be the same as it had been the previous year. Ms. Clay enlisted a consultant well ahead of when she thought the Form 471 was due, and it was only her lack of experience and the lack of guidance from her predecessor that caused Texarkana to miss the deadline. Under these circumstances, it is in the public interest to waive the filing deadline and direct USAC to process Texarkana's FCC Form 471. It does not advance the goals of the E-rate program to deny Texarkana \$74,563.68 in funding because of a good-faith procedural error.

Any of the Commission's rules may be waived if good cause is shown.³ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.⁴ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁵

In previous orders, the FCC has granted waivers where the FCC Form 471 has been filed up to 30 days beyond the deadline.⁶ In the *Bishop Perry Order* and the *Academy for Academic Excellence Order*, the Commission and the Bureau, respectively, granted waivers to applicants who missed the FCC Form 471 filing deadline due to technical malfunctions, school reorganizations, a misunderstanding related to the filing deadline, personal staff emergencies, inadvertent errors, or circumstances beyond their control.⁷ More recently, in October 2017 the

³ 47 C.F.R. § 1.3.

⁴ *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

⁵ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁶ See, e.g., *Request for Review of the Decision of the Universal Service Administrator by Academy of Math and Science, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-487009, et al., CC Docket No. 02-6, Order, 25 FCC Rcd 9256 ¶¶ 8-9 (2010) (*Academy of Math and Science Order*) (granting waiver requests in cases where "unexpected events . . . cause[d] unanticipated delays"). The Commission has also established that FCC Forms 471 that are filed within 14 days of the filing deadline should be considered as properly submitted. See, e.g., *id.* ¶ 9 ("[W]e find that these applications were filed close enough to the deadline so as not to impair the administration of the program."); *Request for Waiver and Review of Decisions of the Universal Service Administrator by Anderson Elementary School*, CC Docket No. 02-6, Order, 27 FCC Rcd 5319 ¶ 2 (Wireline Comp. Bur. 2012) ("We grant the 40 waiver requests . . . because those petitioners' applications . . . were filed shortly after the filing window closed."); *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Acorn Public Library District*, CC Docket No. 02-6, Order, 23 FCC Rcd 15474 ¶ 5 (Wireline Comp. Bur. 2008) ("Because the violation at issue is procedural, not substantive, we find that complete rejection of each of these applications is not warranted.").

⁷ See *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School*, CC Docket No. 02-6, Order, 21 FCC Rcd 5316, 5321-22 ¶ 12 (2006) (*Bishop Perry Order*); *Request for Review of the Decision of the Universal Service Administrator by Academy for Academic*

Bureau applied the *Academy of Academic Excellence Order* standard to grant a waiver allowing the filing of a FCC Form 471 submitted about six weeks late in funding year 2017.⁸

The late filing at issue in this waiver request is as deserving of a waiver as those requests. Texarkana's late filing of its FCC Form 471 was due to inadvertent error, as was the case in some of the appeals granted in the *Academy for Academic Excellence Order*. And as the Commission observed in the *Bishop Perry Order*, "the primary jobs of most of the people filling out [FCC Forms 471] include school administrators, technology coordinators and teachers, as opposed to positions dedicated to pursuing federal grants."⁹ This description certainly applies to Ms. Clay, who is in charge of all of Texarkana's business operations. E-rate is just one of her many responsibilities, and she had been on the job for only four months when the 2018 filing window closed. Here, as in the appeals that the Commission granted in the *Bishop Perry Order*, rigid compliance with USAC's application procedures would not further the purposes of the E-rate program or serve the public interest.

Ms. Clay's belief that the FCC Form 471 filing deadline was in the same month as it had been the previous year was a reasonable belief. USAC itself found it necessary to acknowledge in its announcement that the March filing deadline was a deviation from the previous year.¹⁰ And given her lack of experience with E-rate, it is not surprising that she did not know to look for a filing window announcement. In light of these facts, and the precedent cited above, VST asks that the Bureau waive the FCC Form 471 filing deadline for the application listed above and direct the Schools and Libraries Division of the Universal Service Administrative Company to process this application as "submitted within the window."

Finally, VST respectfully asks that the Bureau waive the deadline for filing appeals with the Commission. Commission precedent requires leniency toward applicants that file their waiver requests late. In its 2010 *Academy of Math and Science* order, the Commission established the criteria justifying special circumstances for the waiver of the application deadline.¹¹ In that order, the Commission granted numerous waiver requests that were filed months after the

Excellence, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-539076, 539722, *et al.*, CC Docket No. 02-6, Order, 22 FCC Rcd 4747, 4748-49 ¶ 4 (Wireline Comp. Bur. 2007) (*Academy for Academic Excellence Order*) (granting requests for waiver of the FCC Form 471 filing deadline for, among other reasons, "inadvertently fail[ing] to file the application forms in a timely manner").

⁸ *Streamlined Resolution of Requests Related to Actions By the Universal Service Administrative Company*, CC Docket No. 02-6, Public Notice, 32 FCC Rcd 9121, 9124 & n.10 (2017); *see also Requests for Waiver and Review of Decisions of the Universal Service Administrator by Abbotsford School District, et al.*; *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 27 FCC Rcd 15299, 15300 ¶ 2 (Wireline Comp. Bur. 2012) (granting waiver where the applicant filed within a reasonable period after the close of the filing window despite delays beyond its control).

⁹ *Bishop Perry Order*, 21 FCC Rcd at 5123 ¶ 14.

¹⁰ USAC 2018 Filing Window Announcement ("This filing window is more in keeping with those used in prior funding years.").

¹¹ *See generally Academy of Math and Science Order*.

window closed.¹² For example, in funding year 2009, the waiver request filed by Bedford Public Schools was granted even though it was filed six months after the window closed.¹³ That was true for several other applicants as well.¹⁴ In fact, some schools filed more than a year after the window closed for their funding year.¹⁵ Here, VST files the instant request for waiver within a time period shorter than many that were granted in the *Academy of Math and Science Order*. VST understands the need for an orderly administration of the program, and that firm deadlines are an essential component. However, VST respectfully argues that consistent with the *Academy of Math and Science Order*, this request for waiver should similarly be granted.

Respectfully,

/s/ Russell Neal

Russell Neal, CEMP
VST Services, LP
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682-237-7670
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¹² See generally *id.* Appendices A, B, C.

¹³ *Id.* Appendix B.

¹⁴ See, e.g. *id.* Appendix B (waiver requests filed by: Berryhill Independent School District 10 (funding year 2008 window closed Feb. 7, 2008, waiver request filed August 19, 2008); Burnet Consolidated Independent School District (funding year 2007 window closed Feb. 7, 2007, waiver request filed Oct. 23, 2007); Congregation Machon Tieferes (funding year 2009 window closed Feb. 12, 2009, waiver request filed Sept. 14, 2009); Greenport Union Free School District (funding year (funding year 2008 window closed Feb. 7, 2008, waiver request filed Sept. 18, 2008)).

¹⁵ See *id.* Appendix B (waiver requests filed by: Academy of Math and Sciences (funding year 2005 window closed Feb. 18, 2005, waiver request filed July 19, 2006); Arlington Public Schools (funding year 2006 window closed Feb. 16, 2006, waiver request filed August 13, 2007)).

Exhibit 1



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname Texarkana ISD - 2018 Application **Application Number** 181042618
Funding Year 2018 **Category of Service** Category 1

Billed Entity

TEXARKANA INDEP SCHOOL DIST
4241 SUMMERHILL RD TEXARKANA TX 75503 -
2733
903-794-3651 x 1023
anita.clay@txkisd.net

Contact Information

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

Billed Entity Number 140638
FCC Registration Number 0011925302
Applicant Type School District

Holiday/Summer Contact Information RNeal@vstservices.com

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
140638	TEXARKANA INDEP SCHOOL DIST	Urban		019907		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
86581	TEXAS MIDDLE SCHOOL	Urban		019907042		None	Public School	None
86583	THERON JONES EARLY LITERACY CENTER	Urban		019907107			Public School	None

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
86584	DUNBAR INTERMEDIATE CENTER	Urban		019907115			Pre-K; Public School	None
86585	WAKE VILLAGE ELEMENTARY SCHOOL	Urban		019907113			Pre-K; Public School	None
86599	TEXAS HIGH SCHOOL	Urban		019907002		None	Public School	None
86600	SPRINGLAKE PARK KDG CENTER	Urban		019907111			Pre-K; Public School	None
86601	WESTLAWN ELEMENTARY SCHOOL	Urban		019907108			Public School	None
86603	HIGHLAND PARK ELEM SCHOOL	Urban		019907105			Pre-K; Public School	None
86637	NASH ELEMENTARY SCHOOL	Urban		019907109			Pre-K; Public School	None
192813	OPTIONS	Urban		019907003		None	Adult Education; Public School	None
16046467	MARTHA AND JOSH MORRIS MATH AND ENGINEERING	Urban		019907116		None	Public School	None
17012688	Waggoner Creek Elementary	Urban				None	Pre-K; 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
86581	TEXAS MIDDLE SCHOOL	Urban	1485	N/A	
86583	THERON JONES EARLY LITERACY CENTER	Urban	393	N/A	86.69%
86584	DUNBAR INTERMEDIATE CENTER	Urban	325	N/A	88.88%
86585	WAKE VILLAGE ELEMENTARY SCHOOL	Urban	668	N/A	47.39%
86599	TEXAS HIGH SCHOOL	Urban	1808	N/A	
86600	SPRINGLAKE PARK KDG CENTER	Urban	380	N/A	51.50%
86601	WESTLAWN ELEMENTARY SCHOOL	Urban	312	N/A	79.21%
86603	HIGHLAND PARK ELEM SCHOOL	Urban	360	N/A	62.67%
86637	NASH ELEMENTARY SCHOOL	Urban	678	N/A	44.52%
192813	OPTIONS	Urban	82	N/A	
16046467	MARTHA AND JOSH MORRIS MATH AND ENGINEERING	Urban	406	N/A	
17012688	Waggoner Creek Elementary	Urban	272	N/A	

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
7169	4847	68.0%	Urban	80%	80%	0%

Funding Request for FRN #1899083341

Funding Request Nickname: Internet Access

Service Type: Data Transmission and/or Internet Access

What is the FRN number from the previous year ? 1799074935

Agreement Information - Contract

Contract Number		Account Number	Account numbers uploaded into this file
Establishing FCC Form 470	170076638	Service Provider	Windstream Communications, LLC (SPN: 143030766)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	May 01, 2017	Based on a multiple award schedule?	No
How many bids were received for this contract?	3	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
Windstream Contract 2017 thru 2020.pdf	3 year windstream contract for POTS , Long Distance, and Internet Service
Account numbers Windstream Contract #167934.pdf	Account numbers for Windstream Contract

Pricing Confidentiality

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

Narrative Internet Service for the District

Line Item # 1899083341.001

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	400.0 Mbps	Download Speed	400.0 Mbps

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 # 1899083341.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$1,600.00	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	= \$1,600.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 2	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$3,200.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$38,400.00	Total Eligible Recurring Costs	\$38,400.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$38,400.00

Recipients of Services

BEN	Name
86581	TEXAS MIDDLE SCHOOL
86583	THERON JONES EARLY LITERACY CENTER
86584	DUNBAR INTERMEDIATE CENTER
86585	WAKE VILLAGE ELEMENTARY SCHOOL
86599	TEXAS HIGH SCHOOL
86600	SPRINGLAKE PARK KDGN CENTER
86601	WESTLAWN ELEMENTARY SCHOOL
86603	HIGHLAND PARK ELEM SCHOOL
86637	NASH ELEMENTARY SCHOOL
192813	OPTIONS
16046467	MARTHA AND JOSH MORRIS MATH AND ENGINEERING
17012688	Waggoner Creek Elementary

FRN Calculation for FRN #1899083341

Monthly Charges	
Total Monthly Recurring Charges	\$3,200.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$3,200.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$38,400.00

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	\$38,400.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$38,400.00
Discount Rate	80%
Funding Commitment Request	= \$30,720.00

[Funding Request for FRN #1899083342](#)

Funding Request Nickname: Leased Lit Service

Service Type: Data Transmission and/or Internet Access

What is the FRN number from the previous year ? 1799075153

Agreement Information - Contract

Contract Number		Account Number	
Establishing FCC Form 470	170076638	Service Provider	Network USA LLC (SPN: 143035892)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	May 01, 2017	Based on a multiple award schedule?	No
How many bids were received for this contract?	3	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, 2027

Document Name	Document Description
Network USA Contract 2017 thru 2027.pdf	Lit Fiber for 2 campuses

Pricing Confidentiality

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

Narrative Leased Lit Service providing 1 GB Fiber Connectivity between campuses for WAN Connection

Line Item # 1899083342.001

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

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 # 1899083342.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$1,522.35	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	= \$1,522.35	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 2	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$3,044.70	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$36,536.40	Total Eligible Recurring Costs	\$36,536.40
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$36,536.40

Recipients of Services

BEN	Name
86585	WAKE VILLAGE ELEMENTARY SCHOOL
86637	NASH ELEMENTARY SCHOOL

FRN Calculation for FRN #1899083342

Monthly Charges	
Total Monthly Recurring Charges	\$3,044.70
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$3,044.70
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$36,536.40

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	\$36,536.40
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$36,536.40
Discount Rate	80%
Funding Commitment Request	= \$29,229.12

[Funding Request for FRN #1899083343](#)

Funding Request Nickname: Leased Dark Fiber

Service Type: Data Transmission and/or Internet Access

What is the FRN number from the previous year ? 1799075480

Agreement Information - Contract

Contract Number		Account Number	
Establishing FCC Form 470	160024695	Service Provider	Network USA LLC (SPN: 143035892)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	March 15, 2016	Based on a multiple award schedule?	No
How many bids were received for this contract?	9	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, 2026

Document Name	Document Description
Network USA DF Contract.pdf	Dark Fiber

Pricing Confidentiality

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

Narrative Leased Dark Fiber provided by Network USA

Line Item # 1899083343.001

Product and Service Details

Purpose

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

Function

Fiber

Type of Connection

Dark Fiber (No Special Construction)

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 # 1899083343.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$1,522.35	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	= \$1,522.35	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$1,522.35	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$18,268.20	Total Eligible Recurring Costs	\$18,268.20
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$18,268.20

Recipients of Services

BEN	Name
86581	TEXAS MIDDLE SCHOOL
86583	THERON JONES EARLY LITERACY CENTER
86584	DUNBAR INTERMEDIATE CENTER
86599	TEXAS HIGH SCHOOL
86600	SPRINGLAKE PARK KDGN CENTER
86601	WESTLAWN ELEMENTARY SCHOOL
86603	HIGHLAND PARK ELEM SCHOOL
192813	OPTIONS
16046467	MARTHA AND JOSH MORRIS MATH AND ENGINEERING
17012688	Waggoner Creek Elementary

FRN Calculation for FRN #1899083343

Monthly Charges	
Total Monthly Recurring Charges	\$1,522.35
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$1,522.35
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$18,268.20

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	\$18,268.20
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$18,268.20
Discount Rate	80%
Funding Commitment Request	= \$14,614.56

Connectivity Questions

District/System-wide Internet Access Questions

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

Download Speed 800.00 Download Speed Units Mbps
Upload Speed 800.00 Upload Speed Units Mbps

Per Entity Basis Questions

Entity Name TEXARKANA INDEP SCHOOL DIST Entity Number 140638

BEN	Entity Name	Download	Units	Upload	Units	Connection	Wifi Sufficient	Barriers to Robust Network
86581	TEXAS MIDDLE SCHOOL	10.00	Gbps	10.00	Gbps	Fiber	Mostly	Equipment too costly
86583	THERON JONES EARLY LITERACY CENTER	1.00	Gbps	1.00	Gbps	Fiber	Completely	Equipment too costly
86584	DUNBAR INTERMEDIATE CENTER	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
86585	WAKE VILLAGE ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
86599	TEXAS HIGH SCHOOL	10.00	Gbps	10.00	Gbps	Fiber	Mostly	Equipment too costly
86600	SPRINGLAKE PARK KDG CENTER	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
86601	WESTLAWN ELEMENTARY SCHOOL	10.00	Gbps	10.00	Gbps	Fiber	Completely	Equipment too costly
86603	HIGHLAND PARK ELEM SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
86637	NASH ELEMENTARY SCHOOL	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
192813	OPTIONS	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
16046467	MARTHA AND JOSH MORRIS MATH AND ENGINEERING	1.00	Gbps	1.00	Gbps	Fiber	Mostly	Equipment too costly
17012688	Waggoner Creek Elementary	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	\$93,204.60
Total funding commitment request amount on this FCC Form 471	\$74,563.68
Total applicant non-discount share of the eligible amount	\$18,640.92

Total budgeted amount allocated to resources not eligible for E-rate support	\$100,000.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$118,640.92
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

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Certified Timestamp 18-Apr-2018 17:27:21 EDT