Before the

Federal Communications Commission

Washington, DC 20554

In the Matter of )

)

Schools and Libraries Universal Service )

Support Mechanism )

)

Appeal of Administrator Decision )

Funding Year 2014 Form 471 967781 )

FRNs 2634292, 2633890, 2633952, & 2633703 )

Granite School District ) CC Docket No. 02-06

(BEN 147824) )

)

**Appeal of Granite School District (BEN 147824)**

**Regarding Improper Payment Finding and USAC Disallowance of Request to Add**

**Eligible Recipients of Service during review**

**USAC Case ID SL-2015-10-Case 391**

Dear Commissioners,

The Granite School District**,** SLD Entity # 147824, appeals the USAC funds recovery decision for 2014 FY 471 application 967781 FRN’s 2634292 ($4,598.12), 2633890 ($784.13), 2633952 ($168.63), and 2633703 ($56.70) due to USAC disallowing the addition of eligible entities to this 471 application that were inadvertently left off through ministerial error. We appeal USAC’s decision to disallow our repeated requests to add these entities to the Form 471 application, and/or request that the commission reverse this finding as it inaccurately represents the facts and causes inappropriate financial burden on the applicant.

During PQA review, the Applicant was notified there was one school site and one NIF site listed on the vendor bills that were not listed on Form 471 application (See Notification of Improperly Disbursed Funds Recovery Letter, dated April 14, 2017). Each of the two sites are eligible LEA entities inadvertently missed through ministerial error when creating the 471 application.

Sites:

SALT LAKE OBSERVATION & ASSESSMENT (YIC), Entity # 17005468, 61 W 3900 S, SALT LAKE CITY, UTAH 84107

GRANITE SCHOOL DISTRICT TRANSPORTATION CENTER, Entity # 16083923, 3000 W PARKWAY BLVD. WEST VALLEY CITY, UTAH 84119

The omission of these two entities was a ministerial and clerical error of missed and/or using the wrong name and failing to enter an item from the source list onto the 471 application. In accordance with the Bishop Perry decision and previous FCC order 11-60, FCC rulings, including DA 09-86, we respectfully ask to allow these eligible entities be added to our 471 application 967781 and the PQA finding reversed.

In reviewing the records for entity SALT LAKE OBSERVATION & ASSESSMENT (YIC), Entity # 17005468, it was determined that the ministerial error occurred which resulted from a failure to recognize the entity name from the vendor invoice which used the generic name of “Salt Lake Youth in Custody”. With Granite School District’s 100 locations, an clerical oversight occurred when matching the generic (billing) name with the correct name and then listing the correct entity number on the 471 application. Vendor invoice billing invoicing documentation is shown on (Appendix A) titled “Granite Circuit Inventory” and (Appendix B) Copy of Granite ERate Year (15) 2012-2013.

GRANITE SCHOOL DISTRICT TRANSPORTATION CENTER, Entity # 16083923 was inadvertently excluded from the Block 4. The location should have been listed as a Non-Instructional Facility (NIF) on the 471 application. As a newer (NIF) location, the ministerial error occurred due to focusing on primarily on school locations rather than NIF locations when entering block 4 entities on the 471 application. Please refer to (Appendix C) Granite directory titled “Granite Circuit Inventory 2015” which is the source document used to create the 471 application and was inadvertently excluded from the block 4 application.

We have corrected our application block 4 entity list and have submitted repeated requests to USAC, both through PIA and PQA reviews, explaining the ministerial error and requesting these additions to Block 4. Granite School District requests that this corrected block 4 listing for application 967781 and all associated FRN’s be funded accordingly.

Appendix D shows Granite’s good faith effort in attempting to correct these errors while working with multiple USAC reviewers over the past several years.

Respectfully submitted,

Russell J. Stauffer,

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July 9, 2018