

**Letter of Appeal Regarding  
USAC Appeal Denial (RFCDL) Dated 7-23-2019  
Applicant: BEN 137472 Galena School District R2**

July 30, 2019

Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Applicant/Appellant Name:	Richard Senturia, Consultant for Applicant/Appellant
Applicant/Appellant:	Galena School District R2
FCC Registration Number:	0016517286
Applicant Billed Entity Number (BEN)	137472
Form 471 Application Number:	171030761
Funding Request Number(s):	1799066513
Funding Year:	2017
USAC Appeal Denial Date:	7-23-2019

To whom it may concern:

We hereby appeal USAC's Appeal Denial (Revised Funding Commitment Decision Letter) Dated July 23, 2019, which denied applicant's request for USAC to correct its own error, and to have USAC's records reflect the updated discount rate previously granted to applicant on a separate but related FRN 1799066760. USAC had granted an appeal increasing the discount rate from 80% to 85% for Category 2, but failed to update its own data system for one FRN. USAC updated only one Category 2 FRN to 85% and the other FRN remained improperly at 80%. We hereby ask that USAC correct its own error and increase FRN 1799066513 from a discount rate of 80% to 85%.

On or about May 3, 2017, applicant filed Form 471 Application Number 171030761, which included FRNs 1799066513 and 1799066760, originally showing a discount rate of 80%. On August 17, 2017, we filed Appeal Number 61155 to increase the discount rate from 80% to 85% based on corrected data for enrollment and low-income students, for both FRNs. On January 4, 2018, USAC granted the appeal for both FRNs, stating:

Your appeal has brought forward persuasive information that the appeal should be approved. The application discount was modified from 80% to 90% to agree with the applicant documentation. The category two FRN was approved at 85% discount.

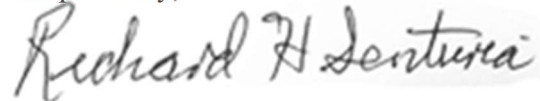
However, USAC's FRN status tool shows that USAC failed to update its own data system regarding FRN 1799066513. The FRN status tool for FRN 1799066760 shows a change to 85% discount rate, but FRN 1799066513 still shows only 80% despite USAC having previously granted the appeal to increase the discount rate to 80%.

On or about September 7, 2018, we filed Customer Service Case #247623 with USAC to ask why the FRN status for FRN 1799066513 still showed 80% instead of 85%. In response to that case, USAC stated that we needed to file an appeal. On January 11, 2019, we filed Appeal Number 132008 to ask that USAC correct its own error regarding FRN 1799066513 and increase the discount rate to 85% pursuant to the prior appeal they had already granted. On July 29, 2019, USAC issued an RFCDL denying the January 11, 2019, appeal on the grounds that it was filed beyond the 60-day time limit.

USAC thus far has refused to correct **its own error** and, as a result, the applicant stands to lose potentially a portion of the funding to which it is entitled. The applicant asks that the FCC: (1) grant applicant's request to have USAC's data system reflect the increased discount rate of 85% on FRN 1799066513 that USAC already granted in the RFCDL dated January 4, 2018; and, (2) order USAC to implement a more effective data system that reflects RFCDL's that USAC itself issues.

In light of the circumstances set forth above, the FCC should grant Applicant's requested relief. Thank you for your consideration of this matter. Please let us know if you require any additional documentation or materials.

Respectfully,

A handwritten signature in black ink that reads "Richard H. Senturia". The signature is written in a cursive, flowing style.

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