

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Request for Review and/or Waiver)	
Of a Decision)	Application No. 1009247
of the Universal Service Administrator)	
by Unite Private Networks, LLC)	

**UNITE PRIVATE NETWORKS, LLC'S
REQUEST FOR REVIEW AND/OR WAIVER**

Unite Private Networks, LLC (“UPN”) respectfully requests review of an appeal denied by USAC, and if necessary, a waiver of Section 54.720(b) of the Commission’s rules. During the 2015-16 Funding Year (“FY”), UPN provided lit Wide Area Network (“WAN”) Services to the Omaha Public School District (the “District”) and timely submitted invoices to USAC using the Service Provider Invoicing (“SPI”) method. USAC failed to pay two of the twelve monthly invoice submissions without providing specific reasons why or indicating which of the twelve months it rejected.

UPN reached out to USAC numerous times to get this information, and USAC consistently told UPN to re-submit the two outstanding invoices. See Attachment A, Affidavit of Rebecca Snavelly, UPN’s Senior Revenue Accountant. Based on this directive, UPN resubmitted the two outstanding invoices 10 times without receiving payment or information about why USAC was refusing to pay those specific invoices¹ – even though USAC paid at least one other monthly

¹ See table of submissions included in Attachment B, which contains information UPN did not receive until March 2017 as outlined in the Background portion of this submission.

invoice every time the invoices for the WAN Services were submitted, and those invoices were for the same services and the same amounts.

After UPN escalated its concerns to Michael Kraft, who was then the USAC manager responsible for invoices in the USAC Schools and Libraries Division, USAC indicated that it had refused payment for three separate reasons.² The reasons USAC provided after the deadline to submit the invoices again or to appeal timely did not apply to the invoice submissions, however, so UPN sought additional direction from USAC, believing there must be a simple explanation or mistake that USAC could correct. Mr. Kraft agreed to investigate why USAC refused payment of the two invoices, but he subsequently left USAC, apparently without completing his investigation. UPN believes any investigation ended after Mr. Kraft left USAC. As a result of USAC's invoice processing errors, the District stands to lose approximately \$132,000 in funding.

Background

The District filed its FY 2015-16 Form 471 within the designated window and requested funding for UPN's WAN Services under Funding Request Number ("FRN") 2747500. The FRN is based on the WAN Agreement signed between UPN and the District on December 17, 2013 and was a continuation of the District's FRN in the 2014-15 FY, which USAC fully funded and paid. USAC issued the Funding Commitment Decision Letter ("FCDL") for FY 2015-16 in the amount of \$794,681.76, which is the full amount requested under this FRN. The District then filed its Form 486 confirming receipt of services as of July 1, 2015.

For the 2015-16 FY, the District elected to use the Service Provider Invoicing ("SPI") method for receipt of its USAC reimbursement. As a result, UPN began invoicing USAC for the monthly fees under the WAN Agreement in its September 2015 invoicing cycle (after the FCDL

² See table of submissions included in Attachment B.

and Form 486 had been filed with USAC). UPN submitted invoices for three months: July, August and September. USAC issued a payment on the invoice submission but only paid one of the three months submitted, without providing a detailed report identifying which months were unpaid or why they had not been paid.

From November 2015 through July 2016, UPN reached out to USAC numerous times to identify which two months were outstanding and why USAC did not pay them. Each time, USAC told UPN to re-submit the invoices with a pledge from USAC that it would process and pay those two invoices. Based on this continuing advice, UPN resubmitted the two invoices, along with the then current monthly invoice, each month for a total of nine times during this period.³ Each time, only one month was paid and UPN did not receive any information about which months were paid or why the others were not paid.

At the end of FY 15-16, USAC had authorized payment of \$662,681.76 for this FRN. As noted above, the total committed amount for this FRN is \$794,681.76 – leaving a balance of approved but not paid funds of \$132,446.96 (monthly invoice of \$66,223.48 x 2 = \$132,446.96).

Things became more confusing in August 2016. At that time, USAC told UPN that instead of submitting the two outstanding invoices, UPN should re-submit all invoices for the 15-16 FY. Under this new approach, USAC said it would deny those invoices already paid and process and pay the remaining two invoices. Based on this direction, UPN re-submitted all invoices on August 30, 2016.

From September 2016 through February 2017, UPN reached out to USAC representative, Yasmine Morales, and the Customer Services Bureau via phone several times to determine why USAC had neither paid the two invoices nor officially denied any payments. Each time, USAC

³ See Exhibit A and Exhibit B for additional details relating to invoice submissions to USAC.

told UPN that the invoices were in processing and UPN did not need to submit additional information or resubmit the invoices as it would only cause further delays in resolving this issue. The deadline to resubmit the invoices was January 30, 2017.

In February 2017, UPN reached out to Michael Kraft for assistance in resolving this issue. Mr. Kraft responded via e-mail in March 2017 and provided the reasons for rejection of the invoices from previous submissions, which have been included in the Table in Attachment B. See also e-mail exchange between Ronda Plummer and Michael Kraft in Attachment C. This was the first time USAC indicated why it had rejected the two invoices, a full 17 months after UPN initially submitted the invoices.

Upon learning of the reasons USAC did not pay the invoices, UPN began working with USAC, through Mr. Kraft, to explain why USAC's decision was incorrect. These reasons included:

1. Service Receipt Not Confirmed by Applicant: USAC alleged that the School District failed to confirm receipt of service. However, the District filed its Form 486 timely (before UPN submitted its invoices for payment) and identified July 1, 2015 as the beginning date of service;
2. Billed/Shipped Date Later Than Invoice Date: This reason has always seemed the most peculiar as invoices both before and after the ones in question were paid. However, during a July 16, 2018 call with the Customer Service Bureau (Case No. 242343), UPN was able to glean that the submissions with this rejection reason were inadvertently submitted as 7/16 and 8/16 instead of 7/15 and 8/15. This mistake occurred when UPN was submitting invoices for services rendered in 2016. If USAC would have provided direction when UPN repeatedly asked for it, UPN could have easily corrected this ministerial error any time between the months of March 2016 through July 2016; and
3. No Response by Service Provider: USAC alleges that UPN failed to respond to information requests even though UPN was in contact with USAC, through Yasmine Morales, Michael Kraft and the Customer Services Bureau, numerous times regarding these invoices.

In March 2017, Mr. Kraft also informed UPN that the invoices submitted on August 30, 2016 had been rejected on December 22, 2016 – although UPN did not receive notification of this

invoice rejection until it was provided by Mr. Kraft. Upon UPN's request, Mr. Kraft agreed to investigate UPN's concerns in more detail to see if he could correct the erroneous rejections without further action.

Mr. Kraft was working on this matter when he left USAC, and it appears that USAC did not refer UPN's concerns to another manager to handle after his departure. After several attempts to reach Mr. Kraft with no response, UPN filed an appeal with USAC on April 12, 2017. USAC then informed UPN that the deadline to file an appeal had lapsed – even though UPN had been interacting with USAC regularly, had not received a denial or any specific information upon which to file an appeal, and believed that a high-ranking USAC official was working on the matter.

Argument

USAC made an error in its processing of invoices and failed to share information with UPN as to why invoices were not paid, which hindered UPN's ability to correct any perceived errors. After multiple attempts by UPN to work with USAC on this issue, USAC then asked UPN to re-submit *all* invoices.

When USAC finally decided to tell UPN why it was rejecting the two invoices – even though it had honored and paid invoices predating and following the two invoices in question – the reasons made no sense to UPN. UPN worked diligently to obtain additional information from USAC and was working cooperatively with USAC, but then USAC stopped responding to UPN and appears to have ended its investigation.

UPN respectfully asks the Commission to grant this appeal and direct USAC to reprocess the invoices and remit payment to UPN. UPN asks the Commission to waive its rules as necessary to grant this appeal.

The Commission may waive any of its rules if good cause is shown.⁴ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.⁵ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁶

Commission precedent supports granting waivers for late-filed appeals when the appeal is necessary due to an error by USAC.⁷ In this situation, USAC should not have rejected the invoices when they were initially submitted and so an appeal should not have been necessary. USAC's rationale—received after the deadline for filing an appeal according to USAC—were simply not valid. Contrary to USAC's statement that the District failed to confirm receipt of service, the District had timely filed its Form 486. Contrary to USAC's statement that UPN had failed to respond to its requests for information, UPN had been in constant contact with USAC regarding the invoices. Finally, the only reason that had any substance behind it was an error UPN made (the wrong service date) only after it had properly submitted the invoices four times. UPN's error would have never occurred had USAC properly paid the invoices in the first place. As such, we respectfully request that the Bureau grant this waiver request as well.

⁴ 47 C.F.R. §1.3.

⁵ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164,1166 (D.C. Cir. 1990).

⁶ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁷ *Request for Review and/or Requests for Waiver of the Decisions of the Universal Service Administrator by Animas School District 6, et al.*, Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-427902, et al., CC Docket No. 02-6, Order, DA 11-2040, at para. 4 (released Dec. 22, 2011) (granting waivers for late filed appeals because the applicant filed within a reasonable time of receiving actual notice or because the appeal would not have been necessary, but for an error by USAC). *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, 17319, para. 1 (WCB 2010) (granting waivers of appeal filing deadlines because the appeals involved errors by USAC).

Further, UPN made every effort to obtain guidance from USAC to correct any perceived errors in its invoicing submission and was repeatedly told to re-submit as is and then USAC would pay the outstanding invoices. In addition, there was nothing peculiar or different in the outstanding invoices than any other invoice submitted for the monthly services during FY 2015-16, which were paid by USAC. Finally, USAC did not provide any information regarding the rejection of the invoices until after the deadline to file the appeal had already passed.

To the extent necessary, UPN requests that the Commission waive its rule to accept the appeal filed with USAC as timely. USAC's former employee acknowledged the lack of information provided by USAC and provided the vital information in late March 2017 – a month after the date by which USAC said UPN should have filed its appeal. It was impossible for UPN to have filed an appeal by the filing deadline, because at that time UPN did not yet know what it was appealing or that it had to file an appeal at all. Instead, USAC directed UPN to a process under which USAC would correct the alleged error, without going through an appeal process. Allowing UPN to appeal this matter to USAC for further review is in the public interest and consistent with Commission precedent.

Closing

UPN timely submitted – several times – its invoices for the District's FRN noted above for the 2015-16 FY. USAC rejected reimbursement for a portion of the FRN referenced above. Notably, UPN submitted invoices – and received approval and payment – for monthly invoices both preceding and following the invoices USAC rejected, which contained the same services and monthly recurring charges. USAC rejected the July 2015 and August 2015 invoices despite UPN's timely submission of these invoices and its repeated efforts to get clarification as to what the problem might be. As it turns out, USAC's reasoning for the rejection of the two invoices is

blatantly erroneous. We ask that the FCC require USAC to reconsider its decision to reject these two invoices. Any other result would set bad precedent and imply that USAC can ignore appropriately submitted invoices.

Respectfully Submitted,



Matt Wiltanger
General Counsel
Unite Private Networks, LLC
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Kansas City, MO 64153
Phone: (816) 469-9085
Fax: (816) 903-9401
E-mail: Matt.wiltanger@upnfiber.com

Certificate of Service

A true and correct copy of the foregoing was sent via e-mail on this 3 day of August, 2018, to the following party:

Universal Service Administrative Company
Appeals Division
appeals@sl.universalservice.org
Washington, DC 20005



Matt Wiltanger
General Counsel, UPN

Attachment A

Affidavit of Rebecca Snavelly

I, Rebecca Snavelly, being first duly sworn state that:

1. I am the Senior Revenue Accountant at Unite Private Networks, LLC (“UPN”) and, in that role, I have personal knowledge as to the contents of this Affidavit and am duly authorized to execute this Affidavit.
2. Through my role as Senior Revenue Accountant, I submitted the invoices to the Universal Services Administrative Company (“USAC”) that are outlined in Attachment B of the Appeal filed by UPN.
3. During the period of November 2016 through February 2017, I contacted representatives at USAC via phone, as well as the Customer Services Bureau, to obtain direction on why two of the invoices were outstanding and which two invoices they were.
4. Each time I spoke with a USAC representative, I was told that the invoices were likely processed and not paid. And, in order to resolve this issue, I should just resubmit the next monthly invoice with two additional invoices for the ones that we showed as outstanding.
5. Due to our normal accounting process, we assumed that the outstanding months were July 2015 and August 2015. The invoices submitted throughout the 15-16 Funding Year (“FY”) were submitted based on this assumption.
6. In September 2016, I was able to reach Yasmine Morales, an invoice reviewer at USAC. Since we were unsure which months had been paid and had no details as to why they weren’t paid, Ms. Morales instructed me to resubmit an invoice for all twelve months of the FY. I completed this submission on August 30, 2016.

7. From September 2016 through February 2017, I reached out to Ms. Morales and did not receive any feedback. I then reached out to the Customer Service Bureau and was told that the invoices were still in processing and nothing was needed from UPN to complete the review.

8. I swear or affirm that I have personal knowledge of the facts stated in this filing and that I am competent to testify to them. I further swear or affirm that all of the statements and representations made in this filing are true and correct to the best of my knowledge and belief.

Rebecca Snavelly
Rebecca Snavelly
Sr. Revenue Accountant
Unite Private Networks, LLC

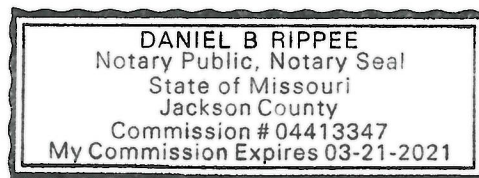
Date: 8/31/18

State of Missouri)
) ss.
County of Platte)

Subscribed and sworn to before me on this 3rd day of August, 2018.

Daniel B Rippee
Notary Public

My Commission Expires: 03/21/21



Attachment B

During the 2015-16 FY, UPN submitted the invoices 10 times. Each time, USAC paid only one of the three invoices UPN submitted (highlighted in green below).

USAC Invoice #	Line #	Date Submitted to USAC	Monthly Amount Requested	Reasons for Non-Payment
2248201	7577476	9/18/15	\$66,223.48	Paid by USAC
	7577477	9/18/15	\$66,223.48	Service Receipt Not Confirmed by Applicant
	7577478	9/18/15	\$66,223.48	Service Receipt Not Confirmed by Applicant
2771875	7643585	10/20/2015	\$66,223.48	Paid by USAC
2994540	7707036	11/23/15	\$66,223.48	Paid by USAC
	7707037	11/23/15	\$66,223.48	No Response from Service Provider
	7707038	11/23/15	\$66,223.48	No Response from Service Provider
2313157	7753832	12/30/15	\$66,223.48	Paid by USAC
	7753833	12/30/15	\$66,223.48	Service Receipt Not Confirmed by Applicant
	7753834	12/30/15	\$66,223.48	Service Receipt Not Confirmed by Applicant
2333635	7800552	1/26/16	\$66,223.48	Paid by USAC
	7800553	1/26/16	\$66,223.48	Service Receipt Not Confirmed by Applicant
	7800554	1/26/16	\$66,223.48	Service Receipt Not Confirmed by Applicant
2362408	7894352	3/17/16	\$66,223.48	Paid by USAC
	7894353	3/17/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date ⁸
	7894354	3/17/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
2633962	7899034	3/22/16	\$66,223.48	Paid by USAC
	7899035	3/22/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
	7899036	3/22/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
2376877	7944584	4/21/16	\$66,223.48	Paid by USAC
	7944585	4/21/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
	7944586	4/21/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
2388056	7991484	5/19/16	\$66,223.48	Paid by USAC
	7991485	5/19/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
	7991486	5/19/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
2401968	8043579	6/20/16	\$66,223.48	Paid by USAC
	8043580	6/20/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
	8043581	6/20/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
2416153	8103915	7/28/16	\$66,223.48	Billed/Shipped Date Later Than Invoice Date
	8103916	7/28/16	\$66,223.48	No Response from Service Provider

After the end of the 2015-16 FY, UPN still had two months of invoices outstanding, but had received no information from USAC as to which months were paid and which ones were not paid – and why the invoices were not paid. In August, USAC told UPN to re-submit all invoices for the 2015-16 FY and those that had not been paid would be paid and the others would be denied as duplicative. This was done on August 30, 2016.

⁸ UPN did not understand this reason for the denial until USAC finally provided, through Customer Service Bureau Case No. 242343, in July 2018. This was a clerical error where the invoices were submitted as 7/16 and 8/16 instead of 7/15 and 8/15, which could have been resolved in any of the following months had USAC explained the reason for the nonpayment.

USAC Invoice #	Line #	Date Submitted to USAC	Monthly Amount Requested	Reasons for Non-Payment
2427842	8147246	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147247	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147248	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147249	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147250	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147251	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147252	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147253	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147254	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147255	8/30/16	\$66,223.48	Incomplete Documents Provided for Review
	8147256	8/30/16	\$66,223.48	Service Receipt Not Confirmed by Applicant
	8147257	8/30/16	\$66,223.48	Service Receipt Not Confirmed by Applicant

Attachment C

Ronda Plummer

From: Ronda Plummer
Sent: Thursday, February 9, 2017 2:24 PM
To: 'Michael Kraft'
Cc: Pam Smith; Matt Wiltanger
Subject: Unite Private Networks 2015-16 USAC Payment Issues
Attachments: Support for 2015-16 Invoicing Issues.pdf

Good afternoon Mr. Kraft,

I previously corresponded with you back in October regarding several pending invoices that haven't been paid by USAC [a copy of the e-mails are included as pages 1-5 of the attached document]. At that time, the invoice submission deadline was approaching and we were seeking guidance about whether these invoices needed to be resubmitted before the deadline. Since we had not heard any information from you or the invoicing staff, we filed an application for a deadline extension. Since then, we have continued to try to resolve the issues with the USAC invoicing staff and haven't made much progress. We have only resolved 2 of the 8 invoicing issues. I'm outlining the outstanding issues below and **asking for some guidance about how to proceed** – especially given that the deadline to resubmit them to USAC is now **February 23, 2017**.

Educational Service Unit #4 – see pages 6-7 for attachment #2

The 2015-16 FRN for ESU #4 is: 2843949 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – but we have not received any response to clarify what we need to submit to get the invoices paid.

Life Skills – see pages 8-9 for attachment #3

The 2015-16 FRN for Life Skills is: 2773483 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – but we have not received any response to clarify what we need to submit to get the invoices paid.

Omaha Public Schools – see pages 10-31 for attachment #4

The 2015-16 FRN for Omaha Public Schools is: 2747500 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – and some follow up documentation was forwarded to her – but we have not received any response to clarify what we need to submit to get the invoices paid.

Nebraska School for Vis/Handicapped – see pages 32-33 for attachment #5

The 2015-16 FRN for Life Skills is: 2843741 and there are 4 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for four of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – but we have not received any response to clarify what we need to submit to get the invoices paid.

Diocese of Lincoln – see pages 34-43 for attachment #6

The 2015-16 FRN for Diocese of Lincoln is: 2865159 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – and some follow up documentation was forwarded to her – but we have not received any response to clarify what we need to submit to get the invoices paid.

Havre School District – see pages 44-55 for attachment #7

The 2015-16 FRN for Havre School District is: and there are 5 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – and some follow up documentation was forwarded to her – but we have not received any response to clarify what we need to submit to get the invoices paid.

Additionally, I'd like to introduce our new Controller, Ms. Pam Smith, as I've cc'd her on this e-mail. Pam will likely be following up with you in the next few days if we have not heard back. We are concerned about the time sensitive nature of these requests and want to make sure that we provide all documentation USAC may need to be able to process the invoices noted above. If you need any additional information from us, please do not hesitate to reach out via e-mail or by phone at the numbers listed below – or our main office number is 816-903-9400. We look forward to hearing from you.

Thanks,

Ronda

Ronda Plummer

Director of K-12 and Regulatory Affairs

[O] 816.425.3566

[C] 816.516.5454

[F] 816.903.9401

ronda.plummer@upnfiber.com

www.uniteprivatenetworks.com



Ronda Plummer

From: Michael Kraft <Michael.Kraft@usac.org>
Sent: Thursday, February 9, 2017 2:27 PM
To: Ronda Plummer
Cc: Pam Smith; Matt Wiltanger
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues

Rhonda,

Thank you very much for the information. I will find out what happened and let you know.

Best regards,

Michael Kraft
(202) 776-0200 (ph)
mkraft@usac.org

From: Ronda Plummer [mailto:Ronda.Plummer@upnfiber.com]
Sent: Thursday, February 09, 2017 3:24 PM
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Thanks,

Ronda

Ronda Plummer

Director of K-12 and Regulatory Affairs

[O] 816.425.3566

[C] 816.516.5454

[F] 816.903.9401

ronda.plummer@upnfiber.com

www.uniteprivatenetworks.com

Unite

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Ronda Plummer

From: Michael Kraft <Michael.Kraft@usac.org>
Sent: Friday, February 10, 2017 6:33 AM
To: Ronda Plummer
Cc: Pam Smith; Matt Wiltanger
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues
Attachments: Unite_021017.xlsx

Ronda,

Please note that only three FRNs have funds remaining. All the other FRNs have been fully paid out.

We do not have any invoices from Unite in process. They have all been completed and most have been completed well within 30 days.

I have put together a spreadsheet listing each invoice line submitted. I have also included the reasons for non-payment. Please note that these are all provided on the remittance statement sent after the review is complete.

You will need to resubmit for any FRN that qualifies for further payment.

Best regards,

Michael Kraft
(202) 776-0200 (ph)
mkraft@usac.org

From: Ronda Plummer [mailto:Ronda.Plummer@upnfiber.com]
Sent: Thursday, February 09, 2017 3:24 PM
To: Michael Kraft
Cc: Pam Smith; Matt Wiltanger
Subject: Unite Private Networks 2015-16 USAC Payment Issues

Good afternoon Mr. Kraft,

I previously corresponded with you back in October regarding several pending invoices that haven't been paid by USAC [a copy of the e-mails are included as pages 1-5 of the attached document]. At that time, the invoice submission deadline was approaching and we were seeking guidance about whether these invoices needed to be resubmitted before the deadline. Since we had not heard any information from you or the invoicing staff, we filed an application for a deadline extension. Since then, we have continued to try to resolve the issues with the USAC invoicing staff and haven't made much progress. We have only resolved 2 of the 8 invoicing issues. I'm outlining the outstanding issues below and **asking for some guidance about how to proceed** – especially given that the deadline to resubmit them to USAC is now **February 23, 2017**.

Educational Service Unit #4 – see pages 6-7 for attachment #2

The 2015-16 FRN for ESU #4 is: 2843949 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – but we have not received any response to clarify what we need to submit to get the invoices paid.

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Thanks,

Ronda

Ronda Plummer

Director of K-12 and Regulatory Affairs

[O] 816.425.3566

[C] 816.516.5454

[F] 816.903.9401

ronda.plummer@upnfiber.com

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Applicant	FRN	Commitment	Total Paid	Residual	Invoice	Line	Received	Completed	Requested	Approved	
DIOCESE OF LINCOLN SCHOOLS	2865159	\$ 27,839.94	\$ 23,200.00	\$ 4,639.94	2248201	7577413	13-Sep-15	01-Oct-15	\$ 2,320.00	\$ -	No Form 486 Filed or Form 486 Missing Start Date
						7577414	13-Sep-15	01-Oct-15	\$ 2,320.00	\$ -	No Form 486 Filed or Form 486 Missing Start Date
						7577415	13-Sep-15	01-Oct-15	\$ 2,320.00	\$ -	No Form 486 Filed or Form 486 Missing Start Date
					2271875	7643515	20-Oct-15	22-Oct-15	\$ 2,320.00	\$ 2,320.00	
						7643516	20-Oct-15	22-Oct-15	\$ 2,320.00	\$ 2,320.00	
						7643517	20-Oct-15	29-Oct-15	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
						7643518	20-Oct-15	29-Oct-15	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
					2294540	7706947	23-Nov-15	30-Nov-15	\$ 2,320.00	\$ 2,320.00	
						7706948	23-Nov-15	07-Dec-15	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
						7706949	23-Nov-15	07-Dec-15	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
					2313157	7753755	30-Dec-15	04-Jan-16	\$ 2,320.00	\$ 2,320.00	
						7753756	30-Dec-15	07-Jan-16	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
						7753757	30-Dec-15	07-Jan-16	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
					2333635	7800476	26-Jan-16	28-Jan-16	\$ 2,320.00	\$ 2,320.00	
						7800477	26-Jan-16	01-Feb-16	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
						7800478	26-Jan-16	01-Feb-16	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
					2362408	7894272	17-Mar-16	21-Mar-16	\$ 2,320.00	\$ 2,320.00	
						7894273	17-Mar-16	21-Mar-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
						7894274	17-Mar-16	21-Mar-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
					2363962	7898959	22-Mar-16	24-Mar-16	\$ 2,320.00	\$ 2,320.00	
						7898960	22-Mar-16	24-Mar-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
						7898961	22-Mar-16	24-Mar-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
					2376877	7944479	21-Apr-16	25-Apr-16	\$ 2,320.00	\$ 2,320.00	
						7944480	21-Apr-16	25-Apr-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
						7944481	21-Apr-16	25-Apr-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
					2388056	7991386	19-May-16	23-May-16	\$ 2,320.00	\$ 2,320.00	
						7991387	19-May-16	23-May-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
						7991388	19-May-16	23-May-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
					2401968	8043491	20-Jun-16	23-Jun-16	\$ 2,320.00	\$ 2,320.00	
						8043492	20-Jun-16	23-Jun-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
						8043493	20-Jun-16	23-Jun-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
					2416153	8103894	28-Jul-16	01-Aug-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
						8103895	28-Jul-16	01-Aug-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
					2427835	8147162	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147163	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147164	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147165	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147166	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147167	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147168	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147169	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147170	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147171	30-Aug-16	19-Dec-16	\$ 2,320.00	\$ -	Duplicate Invoicing of line item
						8147172	30-Aug-16	05-Sep-16	\$ 2,320.00	\$ -	Billed Date Before 486 Service-Start Date
						8147173	30-Aug-16	05-Sep-16	\$ 2,320.00	\$ -	Billed Date Outside of Funding Year
EDUCATIONAL SERVICE UNIT #4	2843949	\$ 11,900.00	\$ 11,900.00	\$ -	2376877	7944487	21-Apr-16	25-Apr-16	\$ 1,190.00	\$ 1,190.00	
						7944488	21-Apr-16	25-Apr-16	\$ 1,190.00	\$ 1,190.00	
						7944489	21-Apr-16	25-Apr-16	\$ 1,190.00	\$ 1,190.00	
						7944490	21-Apr-16	25-Apr-16	\$ 1,190.00	\$ 1,190.00	
						7944491	21-Apr-16	25-Apr-16	\$ 1,190.00	\$ 1,190.00	
						7944492	21-Apr-16	25-Apr-16	\$ 1,190.00	\$ 1,190.00	
						7944493	21-Apr-16	25-Apr-16	\$ 1,190.00	\$ 1,190.00	
						7944494	21-Apr-16	25-Apr-16	\$ 1,190.00	\$ 1,190.00	
						7944495	21-Apr-16	28-Apr-16	\$ 1,190.00	\$ -	Billed Date Before 486 Service-Start Date
						7944496	21-Apr-16	28-Apr-16	\$ 1,190.00	\$ -	Billed Date Before 486 Service-Start Date
					2388056	7991394	19-May-16	23-May-16	\$ 1,190.00	\$ 1,190.00	
						7991395	19-May-16	26-May-16	\$ 1,190.00	\$ -	Billed Date Before 486 Service-Start Date
						7991396	19-May-16	26-May-16	\$ 1,190.00	\$ -	Billed Date Before 486 Service-Start Date

HAVRE SCHOOL DISTRICT 16 A

LIFE SKILLS

OMAHA PUBLIC SCHOOL DISTRICT

2747500	\$	794,681.76	\$	662,234.80	\$	132,446.96	2248201	7577476	18-Sep-15	24-Sep-15	\$	66,223.48	\$	66,223.48	Service Receipt Not Confirmed By Applicant
								7577477	18-Sep-15	15-Oct-15	\$	66,223.48	\$	-	Service Receipt Not Confirmed By Applicant
								7577478	18-Sep-15	15-Oct-15	\$	66,223.48	\$	-	Service Receipt Not Confirmed By Applicant
							2271875	7643585	20-Oct-15	22-Oct-15	\$	66,223.48	\$	66,223.48	
							2294540	7707036	23-Nov-15	30-Nov-15	\$	66,223.48	\$	66,223.48	
								7707037	23-Nov-15	07-Dec-15	\$	66,223.48	\$	-	No response from service provider
								7707038	23-Nov-15	07-Dec-15	\$	66,223.48	\$	-	No response from service provider
							2313157	7753832	30-Dec-15	04-Jan-16	\$	66,223.48	\$	66,223.48	
								7753833	30-Dec-15	28-Jan-16	\$	66,223.48	\$	-	Service Receipt Not Confirmed By Applicant
								7753834	30-Dec-15	28-Jan-16	\$	66,223.48	\$	-	Service Receipt Not Confirmed By Applicant
							2333635	7800552	26-Jan-16	28-Jan-16	\$	66,223.48	\$	66,223.48	
								7800553	26-Jan-16	11-Feb-16	\$	66,223.48	\$	-	Service Receipt Not Confirmed By Applicant
								7800554	26-Jan-16	11-Feb-16	\$	66,223.48	\$	-	Service Receipt Not Confirmed By Applicant
							2362408	7894352	17-Mar-16	21-Mar-16	\$	66,223.48	\$	66,223.48	
								7894353	17-Mar-16	21-Mar-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
								7894354	17-Mar-16	21-Mar-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
							2363962	7899034	22-Mar-16	24-Mar-16	\$	66,223.48	\$	66,223.48	
								7899035	22-Mar-16	24-Mar-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
								7899036	22-Mar-16	24-Mar-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
							2376877	7944584	21-Apr-16	25-Apr-16	\$	66,223.48	\$	66,223.48	
								7944585	21-Apr-16	25-Apr-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
								7944586	21-Apr-16	25-Apr-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
							2388056	7991484	19-May-16	23-May-16	\$	66,223.48	\$	66,223.48	
								7991485	19-May-16	23-May-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
								7991486	19-May-16	23-May-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
							2401968	8043579	20-Jun-16	23-Jun-16	\$	66,223.48	\$	66,223.48	
								8043580	20-Jun-16	23-Jun-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
								8043581	20-Jun-16	23-Jun-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
							2416153	8103915	28-Jul-16	01-Aug-16	\$	66,223.48	\$	-	Billed/Shipped Date Later Than Invoice Date
								8103916	28-Jul-16	18-Aug-16	\$	66,223.48	\$	-	No response from service provider
							2427842	8147246	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147247	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147248	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147249	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147250	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147251	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147252	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147253	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147254	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147255	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Incomplete documents provided for review
								8147256	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Service Receipt Not Confirmed By Applicant
								8147257	30-Aug-16	22-Dec-16	\$	66,223.48	\$	-	Service Receipt Not Confirmed By Applicant

Ronda Plummer

From: Pam Smith
Sent: Thursday, February 16, 2017 11:27 AM
To: Ronda Plummer; Michael Kraft
Cc: Matt Wiltanger
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues

Mr. Kraft,

I just wanted to follow up on Ronda's email below. If you could let us know how to proceed, we would appreciate it. We agree with your schedule on the amounts remaining to be distributed, it's just a matter of getting you the correct invoices/documentation I believe.

We really appreciate your time and help in getting this resolved!

Thanks,

Pam Smith
Controller
[C] 816.491.7330
pam.smith@upnfiber.com
www.uniteprivatenetworks.com



From: Ronda Plummer
Sent: Wednesday, February 15, 2017 11:14 AM
To: Michael Kraft <Michael.Kraft@usac.org>
Cc: Pam Smith <Pam.Smith@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues
Importance: High

Hello Mr. Kraft,

Thanks for your reply below. We will be resubmitting invoices for the three that you identified on your spreadsheet as having additional funds. But, we are concerned about which months to invoice for (so that they aren't denied as duplicates) and about what documentation we should attach (so that they aren't denied for any other reason).

Can you assist us in identifying which months to submit for and what documentation we should attach? If you would prefer that we contact someone else on your team, will you please let us know who this inquiry should be addressed to?

Again, we really appreciate your help as we try to wrap up 2015-16.

Thanks,

Ronda

From: Michael Kraft [<mailto:Michael.Kraft@usac.org>]
Sent: Friday, February 10, 2017 6:33 AM

To: Ronda Plummer <Ronda.Plummer@upnfiber.com>
Cc: Pam Smith <Pam.Smith@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
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Michael Kraft
(202) 776-0200 (ph)
mkraft@usac.org

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Sent: Thursday, February 09, 2017 3:24 PM
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Additionally, I'd like to introduce our new Controller, Ms. Pam Smith, as I've cc'd her on this e-mail. Pam will likely be following up with you in the next few days if we have not heard back. We are concerned about the time sensitive nature of these requests and want to make sure that we provide all documentation USAC may need to be able to process the invoices noted above. If you need any additional information from us, please do not hesitate to reach out via e-mail or by phone at the numbers listed below – or our main office number is 816-903-9400. We look forward to hearing from you.

Thanks,

Ronda

Ronda Plummer

Director of K-12 and Regulatory Affairs

[O] 816.425.3566

[C] 816.516.5454

[F] 816.903.9401

ronda.plummer@upnfiber.com

www.uniteprivatenetworks.com

Unite

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Ronda Plummer

From: Pam Smith
Sent: Thursday, February 16, 2017 12:31 PM
To: Michael Kraft; Ronda Plummer
Cc: Matt Wiltanger
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues

Michael,

What happens on our side is that we may submit for payment for 5 months at a time, but if we receive payment for only 3 months, there is no information we receive that tells us which months are being paid and which months are not being paid. This will usually be the case on the first submission when there are several months. (Ronda feel free to correct me if I have misspoken here).

So, are you saying that it is not tracked by USAC which months have been paid? Or are you simply saying that you don't have that info?

For example, on the largest one, Omaha Public School District, \$132,234.80 of residual to be paid out is reflected on the spreadsheet you forwarded previously. That is exactly two months of reimbursements which is \$66,223.48 x 2. This agrees to our system to the penny as being outstanding. Are you are saying that we should be able to send any two months of invoices and since it's not tracked, it will be reimbursed? Another option would be for us to send all 12 months and two would be paid.

We really just want to ensure we provide the proper documentation. Again, we really appreciate your help.
Thanks,

Pam Smith
Controller
[C] 816.491.7330
pam.smith@upnfiber.com
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From: Michael Kraft [mailto:Michael.Kraft@usac.org]
Sent: Thursday, February 16, 2017 12:13 PM
To: Pam Smith <Pam.Smith@upnfiber.com>; Ronda Plummer <Ronda.Plummer@upnfiber.com>
Cc: Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues

Pam,

A new invoice needs to be submitted for any month's not paid. I do not know which months you received payment for so that is something that will have to be determined at your end.

Best regards,

Michael Kraft
(202) 776-0200 (ph)
mkraft@usac.org

From: Pam Smith [<mailto:Pam.Smith@upnfiber.com>]
Sent: Thursday, February 16, 2017 12:27 PM
To: Ronda Plummer; Michael Kraft
Cc: Matt Wiltanger
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues

Mr. Kraft,

I just wanted to follow up on Ronda's email below. If you could let us know how to proceed, we would appreciate it. We agree with your schedule on the amounts remaining to be distributed, it's just a matter of getting you the correct invoices/documentation I believe.

We really appreciate your time and help in getting this resolved!

Thanks,

Pam Smith
Controller
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From: Ronda Plummer
Sent: Wednesday, February 15, 2017 11:14 AM
To: Michael Kraft <Michael.Kraft@usac.org>
Cc: Pam Smith <Pam.Smith@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues
Importance: High

Hello Mr. Kraft,

Thanks for your reply below. We will be resubmitting invoices for the three that you identified on your spreadsheet as having additional funds. But, we are concerned about which months to invoice for (so that they aren't denied as duplicates) and about what documentation we should attach (so that they aren't denied for any other reason).

Can you assist us in identifying which months to submit for and what documentation we should attach? If you would prefer that we contact someone else on your team, will you please let us know who this inquiry should be addressed to?

Again, we really appreciate your help as we try to wrap up 2015-16.

Thanks,

Ronda

From: Michael Kraft [<mailto:Michael.Kraft@usac.org>]
Sent: Friday, February 10, 2017 6:33 AM
To: Ronda Plummer <Ronda.Plummer@upnfiber.com>
Cc: Pam Smith <Pam.Smith@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: Unite Private Networks 2015-16 USAC Payment Issues

Ronda,

Please note that only three FRNs have funds remaining. All the other FRNs have been fully paid out.

We do not have any invoices from Unite in process. They have all been completed and most have been completed well within 30 days.

I have put together a spreadsheet listing each invoice line submitted. I have also included the reasons for non-payment. Please note that these are all provided on the remittance statement sent after the review is complete.

You will need to resubmit for any FRN that qualifies for further payment.

Best regards,

Michael Kraft
(202) 776-0200 (ph)
mkraft@usac.org

From: Ronda Plummer [<mailto:Ronda.Plummer@upnfiber.com>]
Sent: Thursday, February 09, 2017 3:24 PM
To: Michael Kraft
Cc: Pam Smith; Matt Wiltanger
Subject: Unite Private Networks 2015-16 USAC Payment Issues

Good afternoon Mr. Kraft,

I previously corresponded with you back in October regarding several pending invoices that haven't been paid by USAC [a copy of the e-mails are included as pages 1-5 of the attached document]. At that time, the invoice submission deadline was approaching and we were seeking guidance about whether these invoices needed to be resubmitted before the deadline. Since we had not heard any information from you or the invoicing staff, we filed an application for a deadline extension. Since then, we have continued to try to resolve the issues with the USAC invoicing staff and haven't made much progress. We have only resolved 2 of the 8 invoicing issues. I'm outlining the outstanding issues below and **asking for some guidance about how to proceed** – especially given that the deadline to resubmit them to USAC is now **February 23, 2017**.

Educational Service Unit #4 – see pages 6-7 for attachment #2

The 2015-16 FRN for ESU #4 is: 2843949 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – but we have not received any response to clarify what we need to submit to get the invoices paid.

Life Skills – see pages 8-9 for attachment #3

The 2015-16 FRN for Life Skills is: 2773483 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – but we have not received any response to clarify what we need to submit to get the invoices paid.

Omaha Public Schools – see pages 10-31 for attachment #4

The 2015-16 FRN for Omaha Public Schools is: 2747500 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – and

some follow up documentation was forwarded to her – but we have not received any response to clarify what we need to submit to get the invoices paid.

Nebraska School for Vis/Handicapped – see pages 32-33 for attachment #5

The 2015-16 FRN for Life Skills is: 2843741 and there are 4 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for four of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – but we have not received any response to clarify what we need to submit to get the invoices paid.

Diocese of Lincoln – see pages 34-43 for attachment #6

The 2015-16 FRN for Diocese of Lincoln is: 2865159 and there are 2 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – and some follow up documentation was forwarded to her – but we have not received any response to clarify what we need to submit to get the invoices paid.

Havre School District – see pages 44-55 for attachment #7

The 2015-16 FRN for Havre School District is: and there are 5 months of USAC reimbursement that have not been paid. We submitted all 12 months but were not paid for two of them. We have not received any guidance from USAC as to which months were not paid or why they were not paid. Previous requests for guidance were sent to Yazmin Morales – and some follow up documentation was forwarded to her – but we have not received any response to clarify what we need to submit to get the invoices paid.

Additionally, I'd like to introduce our new Controller, Ms. Pam Smith, as I've cc'd her on this e-mail. Pam will likely be following up with you in the next few days if we have not heard back. We are concerned about the time sensitive nature of these requests and want to make sure that we provide all documentation USAC may need to be able to process the invoices noted above. If you need any additional information from us, please do not hesitate to reach out via e-mail or by phone at the numbers listed below – or our main office number is 816-903-9400. We look forward to hearing from you.

Thanks,

Ronda

Ronda Plummer

Director of K-12 and Regulatory Affairs

[O] 816.425.3566

[C] 816.516.5454

[F] 816.903.9401

ronda.plummer@upnfiber.com

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The logo for Unite Private Networks, featuring the word "Unite" in a stylized, bold font with a small graphic element to the right.

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Ronda Plummer

From: Pam Smith
Sent: Monday, February 27, 2017 3:50 PM
To: Ronda Plummer; Margy Anderson; Kimberly Foxworthy; Becky Snavelly; Melissa Saale
Cc: Andrew Erpelding; Matt Wiltanger
Subject: RE: 2015-16 USAC Payment Issues

I communicated w/ Kraft by email and then he stopped responding. Then I called him and was transferred to his voicemail by his receptionist and he's not responded. I'm not depending on him to provide much more help.

Becky isn't here today but she can probably give them a call tomorrow. I'm not sure if they will be able to tell her any more than what she found out that Friday but she can try.

Pam Smith

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From: Ronda Plummer
Sent: Monday, February 27, 2017 3:16 PM
To: Margy Anderson <Margy.Anderson@upnfiber.com>; Kimberly Foxworthy <Kimberly.Foxworthy@upnfiber.com>; Pam Smith <Pam.Smith@upnfiber.com>; Becky Snavelly <becky.snavelly@upnfiber.com>; Melissa Saale <Melissa.Saale@upnfiber.com>
Cc: Andrew Erpelding <Andrew.Erpelding@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: 2015-16 USAC Payment Issues

Pam has been communicating with Mr. Kraft. And, I think Becky has been communicating with someone on his staff. I would recommend that Pam or Becky reach out to those contacts to see if anything further is needed – or if any decisions have been made.

Thanks!

From: Margy Anderson
Sent: Monday, February 27, 2017 3:15 PM
To: Ronda Plummer <Ronda.Plummer@upnfiber.com>; Kimberly Foxworthy <Kimberly.Foxworthy@upnfiber.com>; Pam Smith <Pam.Smith@upnfiber.com>; Becky Snavelly <becky.snavelly@upnfiber.com>; Melissa Saale <Melissa.Saale@upnfiber.com>
Cc: Andrew Erpelding <Andrew.Erpelding@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: 2015-16 USAC Payment Issues

Ronda,

Were you going to reach out? Or is Becky?

Margy

From: Ronda Plummer
Sent: Monday, February 27, 2017 11:33 AM

To: Kimberly Foxworthy <Kimberly.Foxworthy@upnfiber.com>; Pam Smith <Pam.Smith@upnfiber.com>; Becky Snavelly <becky.snavelly@upnfiber.com>; Melissa Saale <Melissa.Saale@upnfiber.com>
Cc: Margy Anderson <Margy.Anderson@upnfiber.com>; Andrew Erpelding <Andrew.Erpelding@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: 2015-16 USAC Payment Issues

Might be good to reach out to USAC today and see if they need anything further.

Technically, they have 30 days from the date our invoice was submitted to make a payment or issue a denial. So, they still have time – not to worry.

Thanks!

From: Kimberly Foxworthy
Sent: Monday, February 27, 2017 11:18 AM
To: Pam Smith <Pam.Smith@upnfiber.com>; Becky Snavelly <becky.snavelly@upnfiber.com>; Melissa Saale <Melissa.Saale@upnfiber.com>
Cc: Margy Anderson <Margy.Anderson@upnfiber.com>; Andrew Erpelding <Andrew.Erpelding@upnfiber.com>; Ronda Plummer <Ronda.Plummer@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: 2015-16 USAC Payment Issues

I don't receive anything straight from USAC. There is a \$1M payment pending. In looking over the details of that payment, I see only two payments for the Diocese, one for Havre and one for Omaha. I assume these are for the current month.

From: Pam Smith
Sent: Monday, February 27, 2017 10:55 AM
To: Kimberly Foxworthy <Kimberly.Foxworthy@upnfiber.com>; Becky Snavelly <becky.snavelly@upnfiber.com>; Melissa Saale <Melissa.Saale@upnfiber.com>
Cc: Margy Anderson <Margy.Anderson@upnfiber.com>; Andrew Erpelding <Andrew.Erpelding@upnfiber.com>; Ronda Plummer <Ronda.Plummer@upnfiber.com>; Matt Wiltanger <Matt.Wiltanger@upnfiber.com>
Subject: RE: 2015-16 USAC Payment Issues

Kim/Becky/Melissa-

I just wanted follow up on these to see if we received anything back saying they were rejected or....ideally, paid.

Thanks!

Pam Smith
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www.uniteprivatenetworks.com



From: Matt Wiltanger
Sent: Sunday, February 19, 2017 7:10 PM
To: Pam Smith <Pam.Smith@upnfiber.com>
Cc: Kimberly Foxworthy <Kimberly.Foxworthy@upnfiber.com>; Margy Anderson <Margy.Anderson@upnfiber.com>; Becky Snavelly <becky.snavelly@upnfiber.com>; Andrew Erpelding <Andrew.Erpelding@upnfiber.com>; Melissa Saale