

August 8, 2018

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

CC Docket No. 02-6

In the matter of
BROOKWOOD SCHOOL DISTRICT 167
201 GLENWOOD-DYER RD
GLENWOOD, IL 60425

BEN: 135534

SLD Invoice Nos.: 2817102 and 2817185

Request and Petition Submitted by:

Consultant
Gerry Zeller
Zeller and Associates, LLC
2827 Covert Road
Glenview, IL 60025-4606
V: 847.828.4606
F: 847.729.5240
E: gzeller@zellerandassociates.com

Request for Review and Petition for Waiver

BACKGROUND

2/16/2016

Brookwood School District 167 began the Funding Year 2016 process by having its consultant, Gerry Zeller, submit and certify FCC Form 470 No. 160027476 requesting quotes for both Category One and Two services and goods.

4/11/2016

Consultant suddenly took ill and was hospitalized for 18 days returning home to recuperate on April 28, 2016. All clients were notified of the illness and advised to seek other assistance with their E-Rate filings.

5/12/2016

Michael Engel, the District's Business Manager and the EPC Account Administrator submitted and certified FCC Form 471 No. 161030072 with FRN 1699072566 for services from T-Mobile USA, Inc. (SPN: 143026181).

He also submitted and certified FCC Form 471 No. 161030075 with FRN 1699090133 for services from AT&T Corp. (SPN: 143001192).

5/13/2016

In phone consultation with returning consultant, Gerry Zeller, Mr. Engel submitted an RAL to cancel FRN 1699090133 on 471 Application No. 161030075.

5/17/2016

Mr. Engel submits second RAL request to cancel FRN 1699072566 on 471 Application No. 161030072.

5/25/2016

Consultant Gerry Zeller submits and certifies FCC Form 471 No. 161042151 containing FRNs:

- 1699094491 for services from T-Mobile USA, Inc. (SPN: 143026181) and
- 1699094555 for services from AT&T Corp. (SPN: 143001192)

replacing the two FRNs Mr. Engel submitted previously and subsequently cancelled via the RAL process.

7/12/2016**PROGRAM INTEGRITY REVIEW**

Reviewer, Rosa Polanco, requests additional information regarding the above two FRNs:

- 1699094491 for services from T-Mobile USA, Inc. (SPN: 143026181) and
- 1699094555 for services from AT&T Corp. (SPN: 143001192)

7/15/2016

USAC issues FUNDING COMMITMENT DECISION LETTER for 471 No. 161030075 (Attachment A) stating that FRN 1699090133;

- *Status* is "Funded";
- *Committed Amount* is "\$32,476.68";
- *Application FCDL Comments*: "FCC Form 471 application 161030075 was canceled in accordance with a RAL request submitted by Michael Engel received on 5/13/2016.";
- *FCDL Comments*: "MR1: Approved as submitted."

Please note the conflicting information between *Status* and *Application FCDL Comments*.

7/20/2018

In response to the reviewer's question, consultant uses the RAL process to cancel "duplicate" FRN 1699094555.

8/2/2016

Consultant agrees with reviewer that there are duplicate FRNs and erroneously has her cancel FRN 1699094491 for T-Mobile and 1699094555 for AT&T Corp.

8/6/2016

USAC issues Funding Commitment Decision Letter for 471 No. 161030072 (Attachment B) stating that FRN 1699072566;

- *Status* is "Funded";
- *Committed Amount* is "\$696.00";
- *Application FCDL Comments*: "FCC Form 471 application 161030072 was canceled in accordance with a RAL request submitted by Michael Engel received on 5/17/2016.";
- *FCDL Comments*: "MR1: Approved as submitted."

Again, please note the conflicting information. This information is in the FRN Status Tool which we import into our tracking system. Our system monitors the "Status" and "Committed Amount" fields.

12/28/2016

USAC issues Funding Commitment Decision Letter for 471 No 161042151 (Attachment C) stating that:

- FRN 1699094491 is "Cancelled" and its Committed Amount is \$0.00; and
- FRN 1699094555 is "Cancelled" and its Committed Amount is \$0.00.

8/22/2017

Consultant submits and certifies SLD Invoice No. 2669146 for reimbursement of FRN 1699090133 - AT&T Corp; and SLD Invoice #2669138 for FRN 1699072566 - T-Mobile.

9/5/2017

Consultant submits Client Service Bureau Case No. 194061 (Exhibit A) requesting information as to why the above two invoices had not yet been paid. Others submitted on the same day for the same District had been paid.

Response: In review.

10/11/2017

Consultant submits Client Service Bureau Case No. 200137 (Exhibit B) again requesting status of the two still unpaid SLD Invoices.

Response: In review.

10/30/2017

Consultant submits and receives Invoice Deadline Extension Request for FRN 1699072566, T-Mobile (Exhibit C).

He does not submit an IDER for FRN 1699090133 since the FRN Status Tool lists its *Last Date To Invoice* as 1/29/2018 and assumes that the issue with the SLD Invoice No. 2669146 will be resolved by then. Also, since both Invoices (Nos. 2669138 and 2669146 were filed in a timely manner, there should be no need to submit Invoice Deadline Extension Requests for these FRNs.)

2/6/2018

USAC issues Commitment Adjustment Letter citing the Committed amount for both FRNs in question is \$0.00 (Exhibit D and Attachment D).

3/27/2018 (*Shortly after the Funding Year 2018 Form 471 Filing Deadline*)

The consultant submits an appeal to USAC explaining how all four FRNs for two duplicate requests were canceled and two should be reinstated. (Please see Exhibit E.)

5/16/2018

Agreeing, USAC issues a Revised Funding Commitment Decision Letter (Exhibit F):

Revised Funding Commitment Decision Overview

Funding Year 2016

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1699072566	T-Mobile USA, Inc.	Appeals	\$696.00	Approved
1699090133	AT&T Corp.	Appeals	\$32,476.68	Approved
1699094491	T-Mobile USA, Inc.	Appeals	\$0.00	Approved
1699094555	AT&T Corp.	Appeals	\$0.00	Approved

6/1/2018

Consultant submits and certifies SLD Invoice #2817102 for FRN 1699090133 - AT&T Corp and SLD Invoice #2817185 for FRN 1699072566 - T-Mobile

6/8/2018

USAC issues:

- *Form 472 (BEAR) Notification Letter* approving \$0.00 for FRN 1699090133 stating "Invoice Received Date [06/01/2018] Later Than;" and

- *Form 472 (BEAR) Notification Letter* approving \$0.00 for FRN 1699072566 stating "Invoice Received Date [06/01/2018] Later Than;".

6/14/2018

Consultant submits Case No. 239962 requesting explanation of "Later Than".

Client Service Bureau agent Avila W. escalates the case.

7/30/2018

Case No. 239962: Avila W. responds that "the applicant will need to request a Deadline extension.".

Consultant submits:

- Invoice Deadline Extension Request for FRN 1699090133 which is automatically denied and
- Invoice Deadline Extension Request for FRN 1699072566 which is also automatically denied.

Case No. 239962

Client Service Bureau agent Rita T responds with directions for filing an appeal with the Federal Communications Commission.

7/31/2018

Case No. 239962: we ask Client Service Bureau agent, Annisha J. to speak to her supervisor.

8/1/2018

Case No. 239962: Supervisor Brandon returns our call. He suggests that we speak to his supervisor.

8/3/2018

Case No. 239962: Brandon's supervisor returns our call at 6:26 pm on Friday, 8/3. We are unavailable.

8/6/2018

Case No. 239962 (Exhibit G): we return Brandon's supervisor's call. She is not available. She has not returned our call.

ANALYSIS

The above chronology narrates the District and consultant's efforts to adhere to E-Rate Program rules. We present no evidence of waste, fraud, or abuse and avow that there was none. The total denied amount of \$33,172.68 is substantial and the denial of that funding will have a deleterious effect on the School District and its effort to educate its students.

We believe the sequence of events listed above reveals extraordinary USAC time frames. We filed SLD Invoices on August 22, 2017 and submitted Client Service Bureau Cases with regards to those Invoices on September 5, 2017 and October 11, 2017. *USAC issued its Commitment Adjustment Letter on February 6, 2018, an extraordinary 168 days or 5.6 months later.*

We submitted the Client Service Bureau Case No. 239962 on June 14, 2018. The reply came July 30, 2018, *46 days later consuming 76.7% of a 60-day appeal time frame.*

Furthermore, we believe that the situation described above is not all that different than the situations which prompted the Federal Communications Commission to issue Order No. 18-188 allowing applicants 120 days to file for reimbursement subsequent to the receipt of a Revised Funding Commitment Decision Letter.

Also, the FRN Status Tool is extraordinary in the confusing information it provides to this day.

FRN	FRN Status	471 Application Number	Service Provider Name	Last Date to Invoice	Cmtd Funding Request	FCDL Date	Revised FCDL Date	FRN Committed Amount
1699072566	Funded	161030072	T-Mobile USA, Inc.	2/27/2018	\$696.00	8/6/2016	05/17/2018	\$696.00
1699090133	Funded	161030075	AT&T Corp.	1/29/2018	\$32,476.68	7/15/2016	05/17/2018	\$32,476.68
1699094491	Cancelled	161042151	T-Mobile USA, Inc.	10/30/2017	\$0.00	12/28/2016	05/17/2018	\$0.00
1699094555	Cancelled	161042151	AT&T Corp.	1/28/2020	\$0.00	12/28/2016	05/17/2018	\$0.00

Displayed are selected columns from the current FRN Status Tool for the two pairs of duplicate FRNs. Of special interest is the "Last Date to Invoice" column. Note the 1/29/2018 date for the AT&T Corp FRN 1699090133. But, what is especially extraordinary is the 1/28/2020 "Last Date to Invoice" for AT&T Corp FRN 1699094555.

REQUEST

We respectfully request that the Federal Communications Commission direct USAC to pay the SLD Invoices Nos. 2669138 and 2669146 which were timely filed on August 22, 2017 since USAC's Revised Funding Commitment Letter of May 16, 2018 acknowledges the confusion which occurred when the District and its consultant submitted duplicate Funding Year 2016 FRNs.

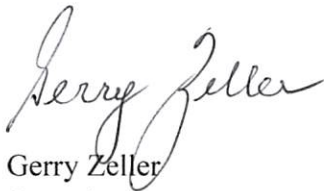
The information contained in the FRN Status Tool assisted in continuing the confusion since it listed the original FRNs 1699072566 and 1699090133 as "Funded" and with a non-zero "Committed Funding Request" amount. This the information which the consultant's internal tracking system follows. It took USAC 186 days to inform us that the District had cancelled these FRNs.

Even though the District submitted the RALs cancelling FRNs 1699072566 and 1699090133 prior to the submission of their duplicates on 471 Application No. 161042151 the Program Integrity Assurance reviewer did not acknowledge that fact or the system did not make her aware of it. This brought on the unnecessary cancellation of FRNs 1699094491 and 1699094555.

We believe that USAC system errors/delays and human errors on both sides created an extraordinarily confusing and protracted situation for which the District need not be penalized. We, therefore, urge the Federal Communications Commission to direct USAC to pay the original, timely submitted, SLD Invoices Nos. 2669138 and 2669146. In lieu of that, to direct USAC to allow the submission of new invoices for FRNs 1699072566 and 1699090133.

Do not hesitate to call 847.828.4606 or email gzeller@zellerandassociates.com with any questions.

Most respectfully submitted,



Gerry Zeller
Consultant

Zeller and Associates, LLC
2827 Covert Road
Glenview, IL 60025-4606

V: 847.828.4606

F: 847.729.5240

E: gzeller@zellerandassociates.com

Exhibit A

#194061

- Summary
- News
- Related Actions

Case Details

Topic

FCC Form 472 - BEAR - Status Inquiry

Status

Closed

Priority

Medium

Inquiry Type

Phone

Created By

User has been deactivated

Created On

9/5/2017 3:34 PM CDT

Organization

BROOKWOOD SCHOOL DISTRICT 167

Case Description

Description

Caller is wanting to know the status of invoice 2669138 & 2669146.

Case Artifacts

Documents

Name	Uploaded By	Upload Date
No items available		

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
No items available		

Case Contact

Case Contact

GERRY ZELLER

Exhibit B

#200137

- Summary
- News
- Related Actions

Case Details

Topic	FCC Form 472 - BEAR - Status Inquiry	Created By	User has been deactivated
Status	Closed	Created On	10/11/2017 11:48 AM CDT
Priority	Medium	Organization	BROOKWOOD SCHOOL DISTRICT 167
Inquiry Type	Phone		

Case Description

Description What is the status of invoice 2669138 and 2669146?

Case Artifacts

Documents

Name	Uploaded By	Upload Date
No items available		

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
No items available		

Case Contact

Case Contact GERRY ZELLER

Exhibit C

From: no-reply@solixinc.com
To: GZELLER@ZELLERANDASSOCIATES.COM
Subject: Invoice Deadline Extension Request for 1699072566 was approved
Date: Tuesday, October 31, 2017 2:03:02 AM

Since this serves as approval, an invoice requesting payment must be submitted so that it is postmarked no later than the date found on the USAC website within the Search Tools in order for your request to be considered as timely filed.

Your new deadline is: 2/26/2018

Exhibit D



Commitment Adjustment Letter

Michael Engel
BROOKWOOD SCHOOL DISTRICT
167
201 GLENWOOD-DYER RD
GLENWOOD, IL 60425

02/06/2018

Our review of your Schools and Libraries Universal Service Support Program (or E-rate) funding request has determined funds were committed in violation of Federal Communications Commission (FCC) rules. You have 60 days from the date of this letter to appeal the following decision(s). For more detailed information see below.

Total commitment adjustment: \$33,172.68

Total amount to be recovered: \$0.00

FCC Form 471	FRN	Commitment adjustment	Total amount to be recovered	Explanation(s)	Party to recover from
161030072	1699072566	\$696.00	\$0.00	The Applicant or Service Provider voluntarily requested commitment adjustment or cancellation of funding commitment	BEN
161030075	1699090133	\$32,476.68	\$0.00	The Applicant or Service Provider voluntarily requested commitment adjustment or cancellation of funding commitment	BEN

See Attached Adjustment Report for more information on the specific FRNs and Explanations listed above.

Commitment Adjustment

FCC rules require the Universal Service Administrative Company (USAC) to rescind commitments and recover funding when it is determined that funding was committed and disbursed in violation of the rules. This letter notifies you that USAC will be adjusting your funding commitment(s) and provides information on how to appeal this decision.

This is NOT a bill. If disbursed funds need to be recovered, USAC will issue a Demand Payment Letter. The debt referenced in the Demand Payment Letter will be due within 30 days of that letter's date. Failure to pay the debt may result in interest, late payment fees, and administrative charges and will invoke the FCC's "Red Light Rule."

FCC's Red Light Rule

The FCC Red Light Rule requires USAC to dismiss pending FCC Form 471 applications, appeals, and invoices or to net disbursements offsetting the debt if the entity responsible for paying the outstanding debt owed to the FCC has not paid the debt or made satisfactory arrangements to pay the debt within 30 days of the Demand Payment Letter. For information on the Red Light Rule, see

<https://www.fcc.gov/licensing-databases/fees/debt-collection-improvement-act-implementation>.



To Appeal This Decision

If you wish to contest any part of this letter, you must first file an appeal with USAC to seek review of the decision. Parties that have filed an appeal with USAC and received an adverse decision may, if they choose, appeal USAC's decision to the FCC. Parties seeking a waiver of a codified FCC rule should file a request for waiver directly with the FCC because USAC cannot waive FCC rules. Your appeal to USAC or waiver request to the FCC must be filed within 60 days of the date of this letter.

All appeals filed with USAC must be filed in EPC by selecting "Appeal" from the menu in the top right hand corner of your landing page and providing the requested information.

Your appeal should include the following information. (Because you file the appeal through your EPC account, the system will automatically fill in some of these components for you).

- 1) Name, address, telephone number, and email address for the contact person for this appeal.
- 2) Indicate specifically that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., Commitment Adjustment Letter) and the decision you are appealing:
 - a. Appellant name;
 - b. Applicant name and service provider name, if different from appellant;
 - c. Applicant BEN and Service Provider Identification Number (SPIN);
 - d. FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC;
 - e. "Commitment Adjustment Letter," AND the exact text or the decision that you are appealing.
- 3) Identify the problem and the reason for the appeal and explain precisely the relief sought. Please keep your appeal to the point, and provide supporting documentation. Be sure to keep a copy of your entire appeal, including any correspondence and documentation. A copy will automatically be saved for you in EPC. USAC will reply to your appeal submission to confirm receipt.

For more information on submitting an appeal to USAC including step by step instructions on how to file the appeal through EPC, please see "Appeals" in the Schools and Libraries section of the USAC website.

As mentioned, parties seeking a waiver of FCC rules or that have filed an appeal with USAC and received a decision may file a request for waiver or appeal USAC's decision to the FCC. Waiver requests or appeals to the FCC must be made within 60 days of the issuance of USAC's decision and include all of the information referenced above for appeals to USAC.

The FCC recommends filing appeals or waiver requests with the Electronic Comment Filing System (ECFS) to ensure timely filing. Electronic waiver requests or appeals will be considered filed on a business day if they are received at any time before 11:59 PM ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193.

For more information about submitting waiver requests or appeals to the FCC, including options to submit the waiver request or appeal via U.S. mail or hand delivery, visit the FCC's website.

Schools and Libraries Division



Adjustment Report

FCC Form 471 Application Number:	161030072
Funding Request Number:	1699072566
Commitment Adjustment:	\$696.00
Total Amount to Be Recovered:	\$0.00
Explanation(s):	The Applicant or Service Provider voluntarily requested commitment adjustment or cancellation of funding commitment
Party to Recover From:	BEN
Funding Year:	2016
Billed Entity Number:	135534
Services Ordered:	Voice
Service Provider Name:	T-Mobile USA, Inc.
SPIN:	143026181
Original Funding Commitment:	\$696.00
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$0.00

Funding Commitment Adjustment Explanation:

We have processed your RAL request of 5/17/2016. Your funding commitment for FRN 1699072566 has been (cancelled in its entirety as of the date of this letter.



Adjustment Report

FCC Form 471 Application Number:	161030075
Funding Request Number:	1699090133
Commitment Adjustment:	\$32,476.68
Total Amount to Be Recovered:	\$0.00
Explanation(s):	The Applicant or Service Provider voluntarily requested commitment adjustment or cancellation of funding commitment
Party to Recover From:	BEN
Funding Year:	2016
Billed Entity Number:	135534
Services Ordered:	Data Transmission and/or Internet Access
Service Provider Name:	AT&T Corp.
SPIN:	143001192
Original Funding Commitment:	\$32,476.68
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$0.00

Funding Commitment Adjustment Explanation:

We have processed your RAL request of 5/13/2016. Your funding commitment for FRN 1699090133 has been cancelled in its entirety as of the date of this letter.

Exhibit E

Appeal of Commitment Adjustment Letter of 02/06/2018

Gerry Zeller

Consultant

CRN: 16051885

On behalf of Michael Engel, letter addressee

BROOKWOOD SCHOOL DISTRICT 167

BEN 135534

In May 2016 the District's Account Administrator, Michael Engel, and its Consultant submitted two pair of duplicate FRNs:

◇>for T-Mobile (143026181)

◇>◇>471: 161030072, FRN 1699072566 and

◇>◇>471: 161042151, FRN 1699094491

And

◇>for AT&T Corp. (143001192)

◇>◇>471: 161030075, FRN 1699090133 and

◇>◇>471: 161042151, FRN 1699094555.

In the PIA process, we stated; "FRN 1699094555 on Form 471 Application No. 161042151 IS a duplicate of FRN 1699090133 on Form 471 Application No. 161030075" cancelling FRN 1699090133. (See uploaded document.) RAL Request ID #5076 cancelled FRN 1699094555. Both AT&T Corp FRNs were thus mistakenly cancelled. The T-Mobile situation was similar.

Therefore, between PIA and RAL, all four FRNs were cancelled. We regret the error and request that FRNs 1699072566 and 1699090133 be reinstated to allow SLD Invoice No. 2669138 for T-Mobile FRN 1699072566 and SLD Invoice No. 2669146 for AT&T Corp FRN 1699090133 be paid.

Do not hesitate to call 847.828.4606 or email gzeller@zellerandassociates.com if there are any questions or issues.

Thank you,

Gerry Zeller

Zeller and Associates, LLC

Exhibit F

Revised Funding Commitment Decision Letter

Funding Year 2016

Contact Information:

Michael Engel
BROOKWOOD SCHOOL DISTRICT 167
201 GLENWOOD-DYER RD
GLENWOOD, IL 60425
mengel@brookwood167.org

BEN: 135534**Post Commitment Wave:** 49

Totals

Original Commitment Amount	\$33,172.68
Revised Commitment Amount	\$33,172.68

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2016 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- Appeals
- Appeals
- Appeals
- Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps



BEN Name: BROOKWOOD SCHOOL DISTRICT 167

BEN: 135534

Post Commitment Wave: 49

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).
 - o **If USAC approved funding on an FRN in your original FCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
 - o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
 - **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
 - **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
 - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time**, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC**, visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.



BEN Name: BROOKWOOD SCHOOL DISTRICT 167

BEN: 135534

Post Commitment Wave: 49

- **To request a waiver of the FCC's rules or appeal USAC's appeal decision**, please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System](#) (ECFS). Include your contact information, a statement that your filing is a waiver request, identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



BEN Name: BROOKWOOD SCHOOL DISTRICT 167

BEN: 135534

Post Commitment Wave: 49

Revised Funding Commitment Decision Overview

Funding Year 2016

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1699072566	T-Mobile USA, Inc.	Appeals	\$696.00	Approved
1699090133	AT&T Corp.	Appeals	\$32,476.68	Approved
1699094491	T-Mobile USA, Inc.	Appeals	\$0.00	Approved
1699094555	AT&T Corp.	Appeals	\$0.00	Approved



BEN Name: BROOKWOOD SCHOOL DISTRICT 167

BEN: 135534

Post Commitment Wave: 49

Post Commitment Request Number: 91966	Post Commitment Request Type: Appeals	Post Commitment Decision: Approved
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FRN: 1699072566	Service Type: Voice	Original Status: Funded	Revised Status: Funded
FCC Form 471: 161030072			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$1,392.00	Total Eligible One Time Charges	\$0.00
Total Pre-Discount Charges		\$1,392.00	
Discount Rate		50.00%	
Revised Committed Amount		\$696.00	

Dates		Service Provider and Contract Information	
Service Start Date	7/1/2016	Service Provider	T-Mobile USA, Inc.
Contract Expiration Date	6/30/2017	SPIN (498ID)	143026181
Contract Award Date	4/11/2016	Contract Number	
Service Delivery Deadline	6/30/2017	Account Number	708-758-5190
Expiration Date (All Extensions)		Establishing FCC Form 470	160027476

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:
MR1: FRN approved as submitted.

Post Commitment Rationale:
Your appeal has brought forward persuasive information that your appeal should be approved. The commitment for the FRN has been reinstated during the appeal review.



BEN Name: BROOKWOOD SCHOOL DISTRICT 167

BEN: 135534

Post Commitment Wave: 49

Post Commitment Request Number: 91966	Post Commitment Request Type: Appeals	Post Commitment Decision: Approved
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FRN: 1699090133	Service Type: Data Transmission and/or Internet Access	Original Status: Funded	Revised Status: Funded
FCC Form 471: 161030075			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$35,335.20	Total Eligible One Time Charges	\$750.00
Total Pre-Discount Charges		\$36,085.20	
Discount Rate		90.00%	
Revised Committed Amount		\$32,476.68	

Dates		Service Provider and Contract Information	
Service Start Date	7/1/2016	Service Provider	AT&T Corp.
Contract Expiration Date	6/30/2019	SPIN (498ID)	143001192
Contract Award Date	4/11/2016	Contract Number	
Service Delivery Deadline	9/30/2017	Account Number	
Expiration Date (All Extensions)		Establishing FCC Form 470	160027476

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:
MR1: FRN approved as submitted.

Post Commitment Rationale:
Your appeal has brought forward persuasive information that your appeal should be approved. The commitment for the FRN has been reinstated during the appeal review.



BEN Name: BROOKWOOD SCHOOL DISTRICT 167

BEN: 135534

Post Commitment Wave: 49

Post Commitment Request Number: 91966	Post Commitment Request Type: Appeals	Post Commitment Decision: Approved
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FRN: 1699094491	Service Type: Voice	Original Status: Cancelled	Revised Status: Cancelled
FCC Form 471: 161042151			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$1,392.00	Total Eligible One Time Charges	\$0.00
Total Pre-Discount Charges		\$1,392.00	
Discount Rate		50.00%	
Revised Committed Amount		\$0.00	

Dates		Service Provider and Contract Information	
Service Start Date	7/1/2016	Service Provider	T-Mobile USA, Inc.
Contract Expiration Date	6/30/2017	SPIN (498ID)	143026181
Contract Award Date		Contract Number	
Service Delivery Deadline	6/30/2017	Account Number	708-758-5190
Expiration Date (All Extensions)		Establishing FCC Form 470	160027476

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:
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Post Commitment Rationale:

Your appeal has brought forward persuasive information that your appeal should be approved. Commitment for FRNs 1699072566 and 1699090133 has been reinstated during appeal review.



BEN Name: BROOKWOOD SCHOOL DISTRICT 167

BEN: 135534

Post Commitment Wave: 49

Post Commitment Request Number: 91966	Post Commitment Request Type: Appeals	Post Commitment Decision: Approved
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FRN: 1699094555	Service Type: Data Transmission and/or Internet Access	Original Status: Cancelled	Revised Status: Cancelled
FCC Form 471: 161042151			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$35,335.20	Total Eligible One Time Charges	\$750.00
Total Pre-Discount Charges		\$36,085.20	
Discount Rate		90.00%	
Revised Committed Amount		\$0.00	

Dates		Service Provider and Contract Information	
Service Start Date	7/1/2016	Service Provider	AT&T Corp.
Contract Expiration Date	6/30/2019	SPIN (498ID)	143001192
Contract Award Date	4/11/2016	Contract Number	201203210247UA
Service Delivery Deadline	9/30/2019	Account Number	
Expiration Date (All Extensions)		Establishing FCC Form 470	160027476

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:
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Post Commitment Rationale:

Your appeal has brought forward persuasive information that your appeal should be approved. Commitment for FRNs 1699072566 and 1699090133 has been reinstated during appeal review.

Exhibit G

#239962

UPDATE CASE

Summary News Related Actions

Case Details

Topic

Other

Status

Pending USAC

Priority

Medium

Inquiry Type

Phone

Created By

USAC

Created On

6/14/2018 3:40 PM CDT

Organization

BROOKWOOD SCHOOL DISTRICT 167

Case Description

Description Inquiry about denied FRN

Case Artifacts

Documents

Name	Uploaded By	Upload Date
No items available		

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
USAC	<p>Thank you for contacting USAC Client Service Bureau regarding Invoice #2817102.</p> <p>We have escalated your case to USAC customer service management for a response.</p> <p>If you have additional questions please contact us at (888)-203-8100.</p> <p>Thank you, Annisha J. Universal Service Administrative Company (USAC) Client Service Bureau (888) 203-8100</p>	7/31/2018 12:16 PM CDT
USAC	<p>Thank you for contacting USAC Client Service Bureau regarding the denial of your invoice extension.</p> <p>Parties that are seeking a waiver of FCC rules or that have filed an appeal with USAC and received a decision may, if they choose, appeal USAC's decision to the FCC. You must submit your appeal to the FCC within 60 days of the date when USAC issued the decision.</p> <p>On all communications with the FCC, be sure to reference the Docket No. 02-6.</p> <p>1. Go to https://www.fcc.gov/ecfs. Alternatively, from https://www.fcc.gov, click "ECFS" in the center of the page under "Access Now". 2. A page containing a filing search will open. At the top of the page, click "Submit a Filing". 3. In the "Proceedings" field, make sure to enter 02-6. 4. When filing a waiver request, be sure to choose WAIVER from the "Type of Filing" field. If you are filing an appeal, you may choose APPEAL. 5. Complete the rest of the fields as they are relevant. There are certain fields that are not applicable, such</p>	7/30/2018 4:47 PM CDT

User	Note	Date
	<p>as the "Report Number" or "Bureau ID Number."</p> <p>6. Upload your written letter of appeal or request for waiver, and any other applicable documentation.</p> <p>In general, your appeal or waiver request should include:</p> <ol style="list-style-type: none">1. Your contact information and the entity name and entity number, or service provider name and SPIN of the organization you represent;2. A label of appeal or waiver request;3. Information regarding the USAC decision being appealed and a copy of USAC's decision, if applicable;4. A statement setting forth the party's interest in the matter presented for review;5. A full statement of relevant, material facts with supporting affidavits and documentation;6. The question presented for review, with reference, where appropriate, to the relevant Commission rule, order or statutory provision; and7. A statement of the relief sought and the relevant statutory or regulatory provision pursuant to which such relief is sought. <p>Electronic appeals will be considered filed on a business day if they are received at any time before 12:00 AM ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193 or via email at ecfshelp@fcc.gov.</p> <p>For the FCC's rules on appeals, you may also see Sections 54.719-54.72: http://www.ecfr.gov/cgi-bin/text-idx?SID=8f7ceac17a80d1abd798eb37023b5b75&node=pt47.3.54&rgn=div5#se47.3.54_1719</p> <p>Additional information on filing appeals to USAC and the FCC is found on the Appeals page of the USAC website: http://usac.org/about/about/program-integrity/appeals.aspx</p> <p>If you have any questions or believe this case was closed incorrectly, please re-open this case or contact us at (888)-203-8100.</p> <p>Thank you, Te'Rita T. Universal Service Administrative Company (USAC) Client Service Bureau (888) 203-8100</p>	
USAC	<p>Thank you for contacting USAC Client Service Bureau regarding Denied FRN.</p> <p>*Although the 2 FRNs 1699090133/1699072566 were Appealed and Approved, they did not include an Invoicing Deadline extension, Invoice 2817102 for FRN 1699090133 was rejected because it was filed past the Last Date to Invoice of 1/29/2018. Invoice 2817185 for FRN 1699072566 was rejected because it was filed past the Last date to Invoice of 2/27/2018 (deadline extension). In order to re-file these Invoices the Applicant will need to request a Deadline extension.*</p> <p>If you have any questions or believe this case was closed incorrectly, please re-open this case or contact us at (888)-203-8100.</p> <p>Thank you, Avila W. Universal Service Administrative Company (USAC) Client Service Bureau (888) 203-8100</p>	7/30/2018 8:56 AM CDT

User	Note	Date
USAC	<p>Thank you for contacting USAC Client Service Bureau regarding Inquiriy About Denied FRN # 1699090133 & 1699072566.</p> <p>We have escalated your case to USAC customer service management for a response.</p> <p>If you have additional questions please contact us at (888)-203-8100.</p> <p>Thank you, Avila W. Universal Service Administrative Company (USAC) Client Service Bureau (888) 203-8100</p>	6/14/2018 4:00 PM CDT

Case Contact

Case Contact GERRY ZELLER