To whom it may concern at the FCC:

This appeal is in regards to FY2019 Form 471 # 191018189 471 for Miami Union Academy.

We are the new consultant acting on behalf of the applicant. We kindly request that you re-consider Appeal# 136909 in regards to this application.

Prior to contracting with our company, the Miami Union Academy E-rate process was being handled by Shelley Garner, one of their teachers. In preparation to file the FY2019 form, Ms. Garner wanted to adjust the school’s numbers in EPC to correctly represent their 80% discount rate. At that time, the profiles had been locked in EPC.

The school had been waiting on the determination of a FY2018 appeal related to their discount rate that still had not been received at that point. It was during the FY2018 PIA review process that the school’s discount was erroneously reduced to 20% although the school supplied valid documentation from the state of Florida to support their requested 80% discount.

While in the process of creating their FY2019 Form 471, Ms. Garner reached out via telephone to inquire of the Client Services Bureau as to how to address the school’s correct discount rate. It was at that time that the CSB agent advised them they could not do anything about it, and that they needed to wait until the FY2018 appeal was completed. This misinformation led to the incorrect filing of App# 191018189 with the 20% discount. The school is an 80% school, and has valid support from the state of Florida to verify this; this documentation was supplied as part of the appeal. (Also see this support included with this Appeal)

The applicant, Ms. Garner, who is a math teacher at the school, was advised incorrectly by CSB. The representative should have advised her that this could be handled two ways; first the request to update the NSLP data could have been listed in the FRN Narrative for the PIA reviewer to take into consideration. Ms. Garner had no idea this was an option and was not informed. Secondly, this could have been handled via a RAL request after the Form 471 was filed; Ms. Garner did not do this as she was advised to wait on the appeal determination.

Miami Union has contracted with Solix as their consultant to help them procure the additional funding they are missing out on. They were not yet a client when they filed app# 191018189, so we could not address this issue properly via the FRN Narrative. Also, they did not sign a contract with us until the PIA review was complete, so we could not submit a timely RAL on their behalf .

Further, please take into consideration that they are a small school, with financial challenges, and are not able to pay for the requested services without USAC help. If the school does not receive the full, correct funding amount of 80%, the service provider will in fact most likely terminate the contract. Please respectively reconsider this appeal for the school.