

August 21, 2018

FCC Wireline Competition Bureau

CC Docket No. 02-6

RE: Schenectady City School District
BEN: 124157
Decision: Appeal Denial – Invoice Reduction
Funding Year: 2016
Form 471: 161048480
FRN: 1699110763
Service Category: Basic Maintenance of Internal Connections
Service Provider: New England Systems and Software Inc.
SPIN: 143011509

Dear USAC Appeal Team:

This letter is an appeal of the USAC decision to reduce Schenectady City School District's Funding Year 2016 FRN 1699110763 request for reimbursement. The FRN is for Basic Maintenance of Internal Connections (BMIC)

New England Systems and Software Inc. (NESS) submitted a reimbursement request on December 9, 2017 requesting a disbursement of \$39,099.15. On April 9, 2018 NESS received notice that the disbursement was \$32,257.50; a shortfall of \$6,841.65. On June 22, 2018 USAC denied the appeal stating documentation was not provided.

After the initial submission the following transactions transpired:

- December 11, 2017 Received email requesting the Service Certification
- December 15, 2017 Service Certification submitted
- January 12, 2018 Emailed invoice reviewer requesting status
- January 12, 2018 Email with status reviewer was completing the review
- January 12, 2018 Reviewer requested information on FRN 1699110763 monthly approved amount of \$3,800 compared to the invoice for \$353,262.82.
- January 18, 2018 Revised invoice outlining FRN information submitted to reviewer
- March 7, 2018 Reviewer requested second Service Certification
- March 12, 2018 NESS responded with a detailed spreadsheet of items and costs. (attached)

Upon review of the details it appears the charges for replacing defective hardware were not paid. The reason as defined in the disbursement report was the \$6,841.65 was not supported by the invoice. NESS and Schenectady City School District dispute this as a reason to not disburse the full amount of the request. The detailed spreadsheet submitted on March 12, 2018 clearly includes this amount. Refer to the highlighted items in the attached document that was submitted during the Invoice Review.

Basic Maintenance of Eligible Broadband Internal Connections (BMIC) is eligible for E-rate support. This includes basic maintenance and technical support appropriate to maintain reliable operation when provided for eligible broadband internal connections including the repair and upkeep of eligible hardware. Replacement of hardware is eligible when the expense to repair the hardware exceeds the expense of replacing the hardware. At that point the applicant receives new equipment and both they and the program benefit from the cost savings.

New England Systems & Software made every attempt to repair the existing hardware. It was determined that repairing the hardware was more expensive than replacing it. In other words, the cost to repair would have exceeded the cost of the replacement making replacing more cost effective. Both the applicant and the E-rate program benefited from this decision and the resulting cost savings.

There was upfront cost for this maintenance contract because it was clearly based on time and materials as evidenced by the attached document. There was no prepayment of services as that is prohibited by the Eligible Services List.

The appeal denial reason stated documentation was not provided. The attached documents were provided with the original USAC appeal. USAC did not request additional documentation. Schenectady City School District did not have any opportunity to provide any additional documentation.

Schenectady City School District and NESS respectfully request the FCC review the information contained in this appeal and direct USAC to reverse the denial and fully disburse the remaining \$6,841.65.

If you have any questions concerning the responses above you may reach me via phone (516-801-7845) or email (brains@e-ratecentral.com)

Sincerely

Becky Rains, PMP AGM CPM

E-rate Central

Certified E-Rate Management Professional

Customer ID	Date	Location	Work	Serial Numbers	Hours	Extend Labor	Hardware	
49929	Jul 7, 2016 03:33 PM	District Wide	Configure All Switches	CN45BFQ090,CN45BFQ00P, All switches District	16	2400.00		
54169	Apr 24, 2017 08:01 AM	Schenectady High	Configure Ports on Switch	CN25F5Z091	1.25	187.50		
49920	Jul 6, 2016 09:09 AM	District Wide	Configure Switch	CN45BFQ090,CN45BFQ00P	0.75	112.50		
50675	Sep 22, 2016 10:08 AM	District Wide	Configure Switches	CN45BFQ090,CN45BFQ00P	2.5	375.00		
52319	Nov 18, 2016 08:15 AM	District Wide	Configure Zone Director	361426000001	4	600.00		
52996	Jan 9, 2017 08:19 AM	District Wide	Configure Zonedirector	361426000001	2	300.00		
53242	Jan 25, 2017 03:11 PM	District Wide	Configure Zonedirector and AP	361426000001	1	150.00		
53274	Jan 27, 2017 02:27 PM	District Wide	Configure Zonedirector and AP	361426000001	2.5	375.00		
48746	Jul 6, 2016 02:53 PM	District Wide	Troubleshoot AP/Controller	361426000001	4	600.00		
54071	Apr 10, 2017 04:03 PM	District Wide	Troubleshoot AP/Controller	361426000001	1.25	187.50		
52653	Dec 12, 2016 08:26 AM	District Wide	Troubleshoot Firewall	CN45BFQ090,CN45BFQ00P	4.5	675.00		
50044	Jul 21, 2016 04:23 PM	District Wide	Troubleshoot Switch	CN45BFQ090,CN45BFQ00P	1	150.00		
50059	Jul 26, 2016 04:27 PM	District Wide	Troubleshoot Switch	CN45BFQ090,CN45BFQ00P	0.5	75.00		
51125	Sep 20, 2016 11:16 AM	District Wide	Troubleshoot Switch	CN45BFQ090,CN45BFQ00P	2	300.00		
52568	Dec 6, 2016 08:46 AM	District Wide	Troubleshoot Switch	361426000001	1.25	187.50		
49593	Jul 14, 2016 09:08 AM	District Wide	Troubleshoot Zonedirector and APs	361426000001	1	150.00		
50768	Oct 28, 2016 09:43 AM	District Wide	Troubleshoot Zonedirector and APs	361426000001	2.5	375.00		
52084	Nov 3, 2016 10:41 AM	District Wide	Troubleshoot Zonedirector and APs	361426000001	0.5	75.00		
50729	Oct 7, 2016 09:14 AM	Central Park	Configure Switch	210235A10BH101000321	1	150.00		
51314	Sep 27, 2016 08:33 AM	Central Park	Configure Switch	CN54F78025	1.5	225.00		
53194	Jan 20, 2017 04:46 PM	Central Park	Configure Switch	210235A10BH101000321	1.5	225.00		
53196	Jan 20, 2017 04:48 PM	Central Park	Configure Switch	210235A10H103000010,210235A10H10300004	1.5	225.00		
54382	May 10, 2017 02:59 PM	Central Park	Configure Switch	210235A10H09C000002	2	300.00		
54417	May 10, 2017 11:08 AM	Central Park	Configure Switch	210235A10BH101001119	0.5	75.00		
50255	Aug 24, 2016 12:39 PM	Central Park	Configure Switches	210235A10H103000046	3	450.00		
53569	Feb 28, 2017 09:03 AM	Central Park	Configure Switches	210235A10BH101001119	2	300.00		
53263	Jan 26, 2017 04:21 PM	Central Park	Configure Zonedirector and AP	361426000001	0.75	112.50		
54346	May 10, 2017 11:09 AM	Central Park	Troubleshoot Switch	210235A10H103000008	1	150.00		
50884	Sep 19, 2016 08:25 AM	Central Park	Troubleshoot Switch	210235A10H103000025	1.5	225.00		
51214	Sep 26, 2016 10:29 AM	Central Park	Troubleshoot Switch	210235A10H09C000002	2.5	375.00		
51267	Oct 19, 2016 04:01 PM	Central Park	Troubleshoot Zonedirector and AP	361426000001, 350901009323	1.5	225.00		
51535	Oct 28, 2016 01:48 PM	Central Park	Troubleshoot Zonedirector and AP	361426000001, 350901009331	2	300.00		
52990	Jan 6, 2017 02:49 PM	Central Park	Troubleshoot Zonedirector and AP	361426000001, 350901009419	2	300.00		
50834	Sep 13, 2016 06:25 AM	Central Park	Troubleshoot Zonedirector and Aps	361426000001, 350901009323	2	300.00		
51042	Sep 21, 2016 11:10 AM	Central Park	Troubleshoot Zonedirector and Aps	361426000001, 350901009354	4	600.00		
50480	Sep 6, 2016 08:13 AM	Elmer	Configure Zone Director, AP	361426000001, 341003000318	1.25	187.50		
54126	Apr 19, 2017 10:56 AM	Hamilton	Configure AP	360901002843	2.25	337.50		
49829	Jul 1, 2016 02:17 PM	Hamilton	Troubleshoot Switch	CN0BBYS0GV	1.5	225.00		
51395	Sep 30, 2016 09:05 AM	Hamilton	Troubleshoot Switch	CN0BBYS0GV	1.5	225.00		
50045	Oct 18, 2016 02:38 PM	Howe	Troubleshoot Switch	CN25F207Q	0.5	75.00		
50244	Sep 22, 2016 10:06 AM	Howe	Troubleshoot Switch	CN25F207Q	1	150.00		
53285	Jan 30, 2017 10:12 AM	Keane	Configure Switch	210235A10GH087000126	1.25	187.50		
54862	Jun 22, 2017 03:55 PM	Keane	Configure Switch	210235A10B077000195	1	150.00		
54574	May 23, 2017 11:36 AM	Keane	Troubleshoot AP/Controller, Configure	361426000001, 151403005315	4.5	675.00		
49850	Jul 7, 2016 11:37 AM	King Magnet	Configure Switch	CN0BBYS043	0.5	75.00		
50485	Oct 19, 2016 09:25 AM	King Magnet	Replace Batteries in UPS for switches	381043X46742	1	150.00	175.00	
54567	May 26, 2017 01:02 PM	King Magnet	Troubleshoot AP/Controller	361426000001, 421003000655,381003002837	2.25	337.50		
52657	Jan 17, 2017 10:51 AM	King Magnet	Troubleshoot Switch	CN0BBYS0BZ	1	150.00		
50192	Aug 12, 2016 09:17 AM	Lincoln	Configure Switch	SG733NW01M	1.5	225.00		
52348	Nov 22, 2016 03:25 PM	Lincoln	Configure Switch	SG424NW05G	4	600.00		
52318	Jan 3, 2017 02:14 PM	Lincoln	Replace Batteries in UPS for switches	JS1034002381	1	150.00	175.00	
54019	Apr 7, 2017 01:37 PM	Lincoln	Replaced Switch. Configure	CN11BYX01J	4.5	675.00	2790.00	
52699	Dec 15, 2016 12:11 PM	Lincoln	Troubleshoot Switch	CN0BBYS04H	1.25	187.50		
51921	Oct 28, 2016 02:36 PM	Lincoln	Troubleshoot Zonedirector and Aps	361426000001, 381003002410	2.5	375.00		
54010	Apr 5, 2017 03:29 PM	Lincoln	Troubleshoot Zonedirector and Aps	361426000001, 381003002410	2	300.00		
54120	Apr 12, 2017 03:54 PM	Mont Pleasant	Configure Controller	361426000001	0.5	75.00		
48096	Jul 14, 2016 08:15 AM	Mont Pleasant	Configure Core Switches	CN45BFQ090,CN45BFQ00P	1.25	187.50		
51883	Oct 25, 2016 01:54 PM	Mont Pleasant	Configure Switch	SG420NW02K	1	150.00		
52396	Nov 23, 2016 10:53 AM	Mont Pleasant	Configure Switch	CN0BBYS038	0.5	75.00		
52463	Nov 29, 2016 11:45 AM	Mont Pleasant	Configure Switch	361426000001	0.5	75.00		
54685	Jun 19, 2017 07:49 AM	Mont Pleasant	Configure Switch	CN33F7803L	0.5	75.00		
54100	Apr 12, 2017 08:57 AM	Mont Pleasant	Configure Switch	SG420NW02K	2	300.00		
48117	Jul 28, 2016 10:50 AM	Mont Pleasant	Configure Switches	CN45BFQ090,CN45BFQ00P	2.25	337.50		
50097	Aug 2, 2016 11:25 AM	Mont Pleasant	Configure Switches	CN0BBYS00D,CN11B95088,CN11B95033	6	900.00		
50128	Aug 16, 2016 02:44 PM	Mont Pleasant	Configure Switches	CN13BF8R00B,CN13BF8R00L	4	600.00		
49912	Jul 7, 2016 03:21 PM	Mont Pleasant	Configure Zone Director	361426000001, 411003004667	1	150.00		
54650	Jun 20, 2017 01:01 PM	Mont Pleasant	Configure Zone Director	361426000001, 411003004597	1	150.00		
54672	Jun 1, 2017 10:13 AM	Mont Pleasant	Configure Zone Director	361426000001, 411003004567	0.5	75.00		
54659	Jun 9, 2017 10:22 AM	Mont Pleasant	Configure Zone Director, AP	361426000001	1	150.00		
49914	Jul 6, 2016 03:13 PM	Mont Pleasant	Configure Zone Director, APs	361426000001, 411003004626	2.5	375.00		
52797	Dec 23, 2016 10:28 AM	Mont Pleasant	Configure Zone Director, APs	361426000001	2	300.00		
51891	Oct 25, 2016 07:27 AM	Mont Pleasant	Configure Zonedirector and AP	361426000001, 411003004416	0.75	112.50		
51892	Oct 25, 2016 07:26 AM	Mont Pleasant	Configure Zonedirector and AP	361426000001, 411003004656	1	150.00		
53173	Jan 19, 2017 03:28 PM	Mont Pleasant	Configure Zonedirector and AP	361426000001, 411003004638	1	150.00		
53210	Jan 23, 2017 11:33 AM	Mont Pleasant	Configure Zonedirector and AP	361426000001, 411003004637	1	150.00		
52263	Nov 16, 2016 09:23 AM	Mont Pleasant	Move Switch and Reconfigure	CN11B95092	3	450.00		
52406	Nov 28, 2016 07:55 AM	Mont Pleasant	Replace Batteries in UPS for switches	WS9929000416	1	150.00	175.00	
53226	Jan 27, 2017 12:35 PM	Mont Pleasant	Replace Batteries in UPS for switches	JS1034002429	1	150.00	175.00	
50225	Aug 29, 2016 08:18 AM	Mont Pleasant	Replace Power Supply	CN43BF702W	1.25	187.50	554.90	
54054	Apr 24, 2017 02:34 PM	Mont Pleasant	Troubleshoot AP	411504708715	0.75	112.50		
52349	Nov 21, 2016 11:01 AM	Mont Pleasant	Troubleshoot AP/Controller	361426000001, 411504008941	1.5	225.00		
52560	Dec 6, 2016 08:23 AM	Mont Pleasant	Troubleshoot AP/Controller	361426000001, 411003004572	2	300.00		
54065	Apr 11, 2017 10:27 AM	Mont Pleasant	Troubleshoot AP/Controller	361426000001	1.5	225.00		
54246	Apr 26, 2017 12:03 PM	Mont Pleasant	Troubleshoot AP/Controller	361426000001	1	150.00		
54262	Apr 28, 2017 02:07 PM	Mont Pleasant	Troubleshoot AP/Controller	361426000001	1.25	187.50		
54409	May 9, 2017 04:12 PM	Mont Pleasant	Troubleshoot AP/Controller	361426000001, 411003004597	8	1200.00		
51019	Sep 19, 2016 10:43 AM	Mont Pleasant	Troubleshoot Firewall	CN45BFQ090,CN45BFQ00P	2	300.00		
52794	Dec 28, 2016 10:00 AM	Mont Pleasant	Troubleshoot Firewall	CN45BFQ090,CN45BFQ00P	6	900.00		
52796	Dec 28, 2016 08:53 AM	Mont Pleasant	Troubleshoot Firewall	CN45BFQ090,CN45BFQ00P	1	150.00		
52838	Jan 3, 2017 03:31 PM	Mont Pleasant	Troubleshoot Firewall	CN45BFQ090,CN45BFQ00P	2	300.00		
53275	Jan 31, 2017 08:57 AM	Mont Pleasant	Troubleshoot Firewall	CN45BFQ090,CN45BFQ00P	3.5	525.00		
52417	Dec 14, 2016 03:05 PM	Mont Pleasant	Troubleshoot Firewall	CN45BFQ090,CN45BFQ00P	3.5	525.00		
54044	Apr 7, 2017 12:20 PM	Mont Pleasant	Troubleshoot Switch	CN50HD904K	2.25	337.50		
52384	Nov 22, 2016 03:10 PM	Mont Pleasant	Troubleshoot Switch	CN11BYX01J	2.5	375.00		
54059	Apr 11, 2017 10:26 AM	Mont Pleasant	Troubleshoot Switch	CN11B95033	0.75	112.50		
52670	Dec 16, 2016 10:25 AM	Mont Pleasant	Troubleshoot Switch	CN0BBYS01Q	2	300.00		
52416	Nov 28, 2016 08:42 AM	Mont Pleasant	Troubleshoot Switch lost configs	CN45BFQ090,CN45BFQ00P	3	450.00		
52446	Dec 5, 2016 02:42 PM	Mont Pleasant	Troubleshoot Switch replace power supply	CN43BF701Q	1	150.00	554.90	
53895	Mar 29, 2017 02:31 PM	Mont Pleasant	Troubleshoot Zonedirector and APs	361426000001, 141403000191	1	150.00		
54375	May 16, 2017 08:35 AM	Paige	Troubleshoot Switch	CN26BY503F	1.25	187.50		
50086	Nov 9, 2016 03:51 PM	Pleasant Valley	Configure Switch	CN0BB9V01C	1.5	225.00		
52864	Jan 4, 2017 08:34 AM	Pleasant Valley	Configure Switches	CN0BBYS0HT	8	1200.00		
54850	Jun 22, 2017 11:39 AM	Pleasant Valley	Configure Zone Director, AP	361426000001, 381003002520	1.25	187.50		
52508	Dec 1, 2016 02:44 PM	Pleasant Valley	Troubleshoot Switch	SG427NW036	1	150.00		
51508	Oct 4, 2016 01:17 PM	Schenectady High	Configure Switch	SG424NW06C,SG428NW085	2	300.00		
53710	Mar 10, 2017 02:25 PM	Schenectady High	Configure Switch	CN24F5Z084	1.25	187.50		
50226	Aug 29, 2016 08:18 AM	Schenectady High	Replace Power Supply	CN23BF8R05S	1.25	187.50	554.90	
49930	Jul 7, 2016 11:55 AM	Schenectady High	Troubleshoot Switch	CN0BBYS04B	1	150.00		
52502	Dec 1, 2016 12:58 PM	Schenectady High	Troubleshoot Switch	CN23BF8R00F	1	150.00		

