



August 23, 2017

Request for Review

Before the
Federal Communications Commission
Washington, D.C. 20554

CC Docket No. 02-06, 13-184 and 96-45

To Whom It May Concern:

At the request of Mark Nadel, FCC Attorney Advisor, the Redding School District respectfully submits a supplement to the FCC Appeal originally filed on July 14, 2017 for a request for reconsideration of the amounts committed to two Funding Request Numbers on the Funding Commitment Decision Letter issued on 8/12/2016 for the following FCC Form 471 and its respective FRNs:

Appellant/Organization Name	Redding School District
Billed Entity Number	144783
FCC Form 471 Number	161031573
Funding Request Numbers:	1699065357, 1699065296

An FCC Appeal for this request was filed on July 14, 2017. The Redding School District would like to provide additional information regarding the Ministerial and Clerical errors which led to the incorrect funding amounts being indicated on the 2016 Form 471 application.

As indicated in the previously submitted Appeal, a ministerial and clerical error was made when inputting the costs and quantities for the Local Voice and Cellular FRNs on 471# 161031573. Redding School District would like to demonstrate the steps involved in the ministerial and clerical errors.

Please see the attached document "[*Shasta UESD Verizon Wireless Invoice.pdf*](#)" (which was also provided as an attached document in the original FCC appeal submitted). The current charge of \$19.58 was indicated in an excel spreadsheet that is used to prepare the costs and details that are to be inputted into the Form 471 application. Please see the screenshots below which show the first page of the Cellular invoice and the current charges used to indicate the Monthly Recurring Cost for FRN 1699065357 and the excel spreadsheet that the cost and detail of the services from the invoice for FRN 1699065357 were entered into and later transferred into the Form 471 application:

KEYLINE
/9600145357/

REDDING SCHOOL DISTRICT
5885 E BONNYVIEW RD
REDDING, CA 96001-4535

Quick Bill Summary

Aug 21 - Sep 20

Previous Balance (see back for details)	\$20.30
Payment – Thank You	–\$20.30
Balance Forward	\$0.00
Monthly Charges	\$10.00
Usage and Purchase Charges	
Voice	\$8.82
Messaging	\$0.00
Verizon Wireless' Surcharges and Other Charges & Credits	\$0.54
Taxes, Governmental Surcharges & Fees	\$0.22
Total Current Charges	\$19.58

Monthly Cost		One-Time Cost	
Unit Cost	\$ 19.58	Unit Cost	\$ -
Ineligible Unit Costs	\$ -	Ineligible Unit Costs	\$ -
Ineligible Monthly cost		Ineligible One-Time cost	
Eligible Monthly Costs	\$ 19.58	Eligible One-Time Costs	
Monthly Quantity	1	One-Time Quantity	1
Total Eligible MRC	\$ 19.58	Total Eligible OTC	\$ -
Months of Service	12		
Total Eligible Recurring Cost	\$ 234.96	Total Eligible OTC	\$ -
SUMMARY			
Total Eligible Recurring Costs		\$	234.96
Total Eligible One-time Costs		\$	-
Pre-Discount Extended Eligible Cost		\$	234.96

The ministerial and clerical error in this instance was that the incorrect source documentation was unknowingly used in the initial determination of the cost and thus resulted in the transfer of the incorrect information into the Form 471 application. Another contributing factor in the error was that the account name on the Shasta UESD Verizon Wireless Invoice incorrectly reads "Redding Elementary School District" due to the fact that the invoices for Redding Elementary School District and Shasta Union Elementary School District are mailed to the same address. The Account Name on the invoice has since been corrected to avoid a similar error in the future. These circumstances clearly and reasonably demonstrate a ministerial and clerical error that occurred during the transfer of information from one document to another during the E-rate Form 471 application process.

The ministerial and clerical error for FRN 1699065296 resulted from a failure to enter an item from the source list onto the application. In this case, the source list was the AT&T Online Billing Consolidator Account for Redding School District which is used by the district to obtain copies of invoices as well as details regarding the services online. There are a total of nine account numbers for Local Voice services for Redding School District. One of the account numbers was missed when transferring the Monthly Recurring Costs from the source documentation from

the Online Billing Account into the Form 471 application. Please see the screenshot of the account number in question below:

Bill Payer(BAN): ×

Last Invoice: 04-19-2017 Bill Round: 19 Customer ID: 34701545

Bill Payer's Open Invoice Activity

Prev Balance	Charges	Adjustments	Payments	Est Balance Due		Disputes
\$2,613.06	\$1.20	\$0.00	\$2,613.06 cr	\$1.20		\$0.00

History of Account Summary

1 2							
No.	Invoice Date	Invoice #	Current Charges	Previous Balance	Total Due	Payments	Adjustments
1	04-19-2017	0009569335	\$2,714.90	\$5,128.62	\$2,613.06	\$5,128.62 cr	\$101.84 cr
2	03-19-2017	0009433092	\$2,688.36	\$5,137.93	\$5,128.62	\$2,595.83 cr	\$101.84 cr
3	02-19-2017	0009296904	\$2,697.67	\$2,542.10	\$5,137.93	\$0.00	\$101.84 cr
4	01-19-2017	0009161300	\$2,643.94	\$2,554.51	\$2,542.10	\$2,554.51 cr	\$101.84 cr
5	12-19-2016	0009026223	\$2,656.35	\$2,617.86	\$2,554.51	\$2,617.86 cr	\$101.84 cr
6	11-19-2016	0008890360	\$2,719.70	\$2,608.31	\$2,617.86	\$2,608.31 cr	\$101.84 cr
7	10-19-2016	0008750544	\$2,710.15	\$2,599.52	\$2,608.31	\$2,599.52 cr	\$101.84 cr
8	09-19-2016	0008620882	\$2,701.36	\$2,601.13	\$2,599.52	\$2,601.13 cr	\$101.84 cr
9	08-19-2016	0008487993	\$2,702.97	\$2,351.42	\$2,601.13	\$2,351.42 cr	\$101.84 cr
10	07-19-2016	0008355843	\$2,503.42	\$2,488.47	\$2,351.42	\$2,488.47 cr	\$152.00 cr
11	06-19-2016	0008224500	\$2,640.47	\$2,486.56	\$2,488.47	\$2,486.56 cr	\$152.00 cr
12	05-19-2016	0008093462	\$2,636.84	\$2,412.86	\$2,486.56	\$2,412.86 cr	\$150.28 cr

The ministerial and clerical error in this case was simply a failure to enter costs from the source documentation into the Form 471 application. The current charges of approximately \$2,700 associated with this account were inadvertently missed when entering costs associated with FRN 1699065296 into the Form 471 application.

The information outlined in this document clearly demonstrates that the errors made during the Form 471 filing process were simply errors made during the preparation and filing the Form 471 application and fall within USAC's scope and definition of correctable Ministerial and Clerical Errors. The Redding School District did not fail to include an entire FRN or service on the Form 471 application, but merely made errors while entering the details of the Funding Requests within the application, which gives merit to the corrections that are being requested, and while these errors may seem trivial in the scope of E-rate program, it is meaningful to a small school district such as Redding School District, which relies on the funding it receives from the E-rate program. The Redding School District kindly asks for the reconsideration of the information provided in this supplemental document as well as the original appeal submitted on July 14, 2017 and for consideration to revise the Funding Request amounts as indicated in the previous appeal document.

Sincerely,

Lehna Markarian

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