

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Request for Waiver by)	Application No. 161011907
Carroll County School District)	
Regarding a Funding Decision by the)	
Universal Service Administrative Company)	

Petition for Waiver

In accordance with sections 54.719 through 54.722 of the Commission's rules,¹ Carroll County School District² (CCPS) requests a Federal Communications Commission ("FCC" or "Commission") review of a Universal Service Administrative Company (USAC) decision to reduce funding pertaining to a Funding Year 2016 FCC Form 472 – Billed Entity Applicant Reimbursement Form ("Form 472" or "BEAR") submitted on behalf of CCPS.³ USAC was partially incorrect in its review of service provider bills and gave CCPS no notification, nor opportunity to provide clarification, prior to reducing CCPS's funding. For the reasons detailed below, CCPS respectfully requests that the Commission extend the invoice deadline for the

¹ 47 C.F.R. § 54.719(b), (c); 47 C.F.R. § 54.722(a).

² Billed Entity Number 126369.

³ SLD Invoice #2777988, seeking reimbursement of committed Basic Maintenance of Internal Connections charges associated with FRN 1699098468.

funding request at issue, and to the extent necessary, waive Section 54.514(a) and (b)⁴, and waive any other rules necessary to effectuate its grant of this request for waiver.⁵

I. Background

On February 23, 2018, E-Rate Elite Services, Inc. (EES), CCPS's E-Rate Consultant, submitted a BEAR, SLD Invoice #2777988, to USAC seeking reimbursement of committed Basic Maintenance of Internal Connections (BMIC) costs incurred by CCPS during funding year 2016. On May 7, 2018, 73 days later, EES received an email from a USAC Invoice Reviewer requesting copies of the service provider bills supporting the requested reimbursement. The response was submitted to the USAC Invoice Reviewer on May 15, 2018, which included the service provider bills and a reconciliation spreadsheet.⁶

While reviewing information downloaded from USAC's FRN Status Tool on June 26, 2018, EES noted that USAC had authorized disbursement of \$31,647.33, which was \$24,983.25 less than the amount requested for reimbursement on SLD Invoice #2777988. On July 3, 2018 EES received USAC's BEAR Notification Letter, dated June 27, 2018.⁷ USAC's only explanation for the reimbursement reduction was "Ineligible service or product removed".

⁴ 47 C.F.R. §54.514(a) (requiring applicants seeking to receive discounts for eligible services to submit invoices to the Administrator within 120 days after the last day to receive service or 120 days after the date of the FCC Form 486 Notification Letter); 47 C.F.R. §54.514(b) (permitting applicants or service providers to request a one-time, 120-day extension of the invoicing deadline if timely requested);

⁵ Because USAC lacks the authority to waive the Commission's rules pertaining the invoice filing deadline and invoice deadline extensions, CCPS is filing this appeal directly with the Commission, pursuant to 47 C.F.R. § 54.719(c).

⁶ Exhibit 1, CCPS Response to USAC Invoice Review

⁷ Exhibit 2, USAC BEAR Notification Letter

On July 6, 2018, EES submitted Customer Service Case #241811 in USAC's E-Rate Productivity Center (EPC) requesting an explanation of the product(s) or service(s) that were deemed ineligible by USAC's Invoice Reviewer. On August 2, 2018, 27-days after receiving the request, USAC Customer Service provided what they claimed was "a spreadsheet that shows exactly what was removed from Invoice 2777988."⁸ Upon further review, including recent USAC funding decisions and eligibility information obtained from the equipment manufacturers, we believe that USAC's Invoice Reviewer made several mistakes, and omitted charges for a number of eligible BMIC charges. A revised bill reconciliation shows reimbursements totaling approximately \$5,415.52 for eligible BMIC charges that were incorrectly omitted by the USAC Invoice Reviewer.⁹

I. WAIVER IS APPROPRIATE BECAUSE THIS ISSUE SHOULD HAVE BEEN RESOLVED WITH USAC

The Commission has recently granted requests for waiver that are similar in nature to this request. This appeal would not have been necessary if USAC had notified CCPS it intended to modify the requested reimbursement, and provided an opportunity to provide clarification, as is the customary process USAC Program Integrity Assurance (PIA) follows during the FCC Form 471 application review process. Accordingly, CCPS respectfully requests that the Commission waive section 54.514 of its rules, consistent with its precedent, and direct USAC to approve an additional Invoice Deadline Extension for FRN 1699098468.

⁸ Exhibit 3, USAC Invoice Reconciliation

⁹ Exhibit 4, CCPS Revised Invoice Reconciliation

Additionally, we are requesting the Commission waive section 54.720 of its rules due to the 27-days it took USAC Customer Service to provide the additional information. This amounted to nearly half of the 60-days in which an affected party is given to request a review or waiver of an Administrative decision.¹⁰

Any of the Commission's rules may be waived if good cause is shown.¹¹ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.¹² In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.¹³

In its June 29, 2018 streamlined resolution of requests related to actions by the Universal Service Administrative Company, the Wireline Competition Bureau (Bureau) granted two requests for waiver of the appeal filing deadline on the grounds that “the issue on appeal before the Commission should have been resolved with USAC before the petitioner resorted to filing an appeal.”¹⁴ These decisions are the most recent in a long history of orders showing the Commission's clear expectation that USAC attempt to resolve known or suspected issues with

¹⁰ See Requests for Review and/or Waiver of Decisions of the Universal Service Administrator by ABC Unified School District et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 26 FCC Rcd 11019, 11019, para. 2 (WCB 2011) (ABC Unified Order) (granting waivers of filing deadline for appeals because they submitted their appeals or waiver requests within a reasonable period of time after receiving actual notice of USAC's adverse decision); 47 CFR §§ 54.720(a), (b).

¹¹ 47 C.F.R. § 1.3.

¹² *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*).

¹³ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

¹⁴ Streamlined Resolution of Requests Related to Actions By the Universal Service Administrative Company, CC Docket No. 02-6, WC Docket No. 06-122, Public Notice, DA 18-672, at 4 n.11 (rel. June 29, 2018) (citing Requests for Review of Decisions of the Universal Service Administrator by Savannah R-III School District; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 23 FCC Rcd 12053, 12057 n.30 (*Wireline Comp. Bur.* 2008)).

the applicant before issuing a funding decision. In light of this precedent, the issue in the instant appeal is one that USAC clearly should have attempted to resolve with the applicant before reducing CCPS's reimbursement request.

II. CONCLUSION

For the aforementioned reasons, we request that the Commission grant our request for waiver of the limit to a single deadline extension, and direct USAC to approve an additional Invoice Deadline Extension for FRN 1699098468. In addition, CCPS request the Commission waive whatever other rules may be necessary to effectuate its grant of this appeal.

Respectfully submitted *on behalf of*
Carrol County School District,

/s/ Christopher M. Lenhardt

Chris Lenhardt
E-Rate Elite Services, Inc.
clenhardt@erateelite.com
410-902-5800 ext 102

Exhibit 1

From: Chris Lenhardt <clenhardt@erateelite.com>
Sent: Tuesday, May 15, 2018 1:01 PM
To: 'Lisa Butera'
Subject: RE: SLD Invoice No 2804286/SP_App No 44143 - Response
Attachments: 16CCSD-PIA_5245-Invoice Review-Skyline.pdf; 16CCPS-Bill_1699098468-BMIC-Skyline-Reconciliation.xlsx

Importance: High

Lisa,

Please see the attached bills and reconciliation spreadsheet pertaining to your request. The equipment subject to support is noted in the attached bills.

If you have any questions please contact us anytime.

Thanks!

Chris



Christopher M. Lenhardt

Christopher M. Lenhardt
 Director of Client Operations
 Phone: (410) 902-5800
 Fax: (410) 581-1209



From: Lisa Butera [<mailto:Lisa.Butera@usac.org>]
Sent: Monday, May 7, 2018 2:13 PM
To: 'reimbursements@erateelite.com' <reimbursements@erateelite.com>
Cc: 'Chris Lenhardt@1410-581-1209' <IMCEAFAX-Chris+20Lenhardt+401410-581-1209@usac.org>
Subject: SLD Invoice No 2804286/SP_App No 44143
Importance: High

SLD Invoice No	SP_App Invoice No	Line ID	Customer Billed Date	Customer Ship Date	471	FRN	
2777988	44143	9070111	18-Oct-16		161011907	1699098468	1

I am reviewing your request for reimbursement of the invoice line/s noted above.

BILLS:

Please submit:

- I. A copy of the summary page/s for the bill/s sent to Applicant to show:
 - a. Bill Date / Ship Date,
 - b. Service Provider Name,
 - c. Bill-To Entity,
 - d. Current Charges,
 - e. Description of Products / Services Delivered,
 - i. Please provide written description of products / services when not indicated on bill. For example, Network Equipment is an insufficient description of product delivered.
 - ii. List of Equipment being maintained.
- II. If the service provider/third party listed on the bill is different from the service provider listed on the above FRN, please specify:
 - a. Whether a change of service provider occurred;
 - b. If not, please specify if the third party listed on the bill is an authorized third party biller.
 - a) If the third party listed on the bill is an authorized third party biller, please also provide the following:
 - i. A signed and dated contract or documentation of the written and dated offer from the third party biller to the service provider listed on the above FRN and the service provider's written and dated acceptance of the offer and authorization of the third party biller to bill the applicants for the services provided on its behalf.
 - ii. A signed and dated contract or documentation of the written and dated offer from the third party biller to the billed entity listed on the FCC Form 471 for this FRN as well as the billed entity's written and dated acceptance of the offer and authorization of the third party biller to bill the applicants for the services provided on behalf of the actual service provider.
- III. If the invoice is for deposits or up-front charges for services, please include a copy of the full contract that supports those charges.

RESPONSE REQUIREMENT:

Exhibit 1

Please provide this information to me as soon as possible within the next 7 calendar days, by End of Day Monday May 14, 2018. Failure to do so may result in a reduction or rejection of the invoice, without further request. In this event, please ensure you have all necessary documents collected before resubmitting your request. If you have any questions, please contact me within this 7 day period.

Thank you for your cooperation and continued support of the Universal Service Program.

Lisa Butera

Case Management Associate, Invoicing Team,

Schools and Libraries Program

30 Lanidex Plaza West, Room N210 | Parsippany, NJ 07054

T: 973.581.7620 | F: 973.599.6539

Lisa.Butera@usac.org

The information contained in this electronic communication and any attachments and links to websites are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering this communication to the intended recipient, be advised you have received this communication in error and that any use, dissemination, forwarding, printing or copying is strictly prohibited. Please notify the sender immediately and destroy all copies of this communication and any attachments.

Exhibit 1



NO LIMITS.

6956 Aviation Blvd., Suite F
 Glen Burnie, MD 21061
 (410) 553-2600
 FEIN: 37-1494684

INVOICE**Bill To:**

Carroll County Public Schools
 125 North Court Street
 Westminster, MD 21157

Contract Info	Contract No.	
	Project No.	CCPS ERATE SO
	P.O. Number	01701546
Invoice Info	Number	0000004877
	Date	October 18, 2016
	Period	09/01/2016 to 09/30/2016
	Terms	Net 30 Days

	Hours/Quantity	Rate	Amount
PAN-SVC-PREM-5050-R Premium Support 2-year prepaid, PA-5050 (October 2017 - July 2019)	2.00	\$22,140.00	\$44,280.00
Total CCPS Erate Sales Order			\$44,280.00

Total Due	\$44,280.00
------------------	--------------------

PAID CCPS Est Pay Skyline Project (Carroll County)

110605000000175 201

Handwritten signature

Please Remit Payment to:
 Skyline Technology Solutions
 6956 Aviation Blvd., Suite F
 Glen Burnie, MD 21061

If you have any questions, please contact us at: AR@skylinenet.net

Exhibit 1



Skyline Technology Solutions
 6956-F Aviation Blvd.
 Glen Burnie, MD 21061
 Phone: (410) 553-2600
 Fax: (410) 787-2551
 email address: ar@skylinenet.net
 Federal Tax ID: 37-1494684

ok to pay

INVOICE

Invoice No. I100002951
 Invoice Date 10/14/2016
 Order No. O100001563
 Shipper ID S100002966
 Due Date 11/13/2016
 Customer ID CC PUB SCH
 P.O. # 01701546

E-rate

BILL TO:	SHIP TO:
Carroll County Public Schools 125 North Court Street Westminster, MD 21157	Gary Davis Carroll County Public Schools 125 North Court Street Westminster, MD 21157

PAGE 1

PARTNUMBER	DESCRIPTION	UNITS	PRICE	EXT PRICE
LIC-RFP	Feature license to enable support for Policy Firewall per Ac	2,048.00	0.0000	0.00
EN3-LIC-RFP	ARUBACARE SUPPORT FOR LIC-RFP (3 YEAR)	2,048.00	15.0000	30,720.00

Food Club Card Prep Book And Magazine (Quarterly)

1106050000 000 175 2 01

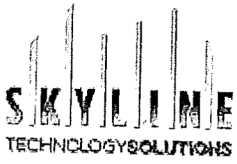
CRJ

Please Remit Payment To:

Skyline Network Engineering, LLC
 6956-F Aviation Blvd.
 Glen Burnie, Md. 21061
 410-553-2600

Sales Total	30,720.00
Shipping & Handling	0.00
Misc. Charges	0.00
Tax Total	0.00
Less Paid Amount	0.00
TOTAL	30,720.00

Exhibit 1



Skyline Technology Solutions

6956-F Aviation Blvd.
 Glen Burnie, MD 21061
 Phone: (410) 553-2600
 Fax: (410) 787-2551
 email address: ar@skylinenet.net
 Federal Tax ID: 37-1494684

ok to pay

INVOICE

Invoice No. I100002943
 Invoice Date 9/30/2016
 Order No. O100001549
 Shipper ID S100002958
 Due Date 10/30/2016
 Customer ID CC PUB SCH
 P.O. # 01701546

E-rate

BILL TO:

Carroll County Public Schools
 125 North Court Street
 Westminster, MD 21157

SHIP TO:

Gary Davis
 Carroll County Public Schools
 125 North Court Street
 Westminster, MD 21157

PAGE 1

PART NUMBER	DESCRIPTION	UNITS	PRICE	EXT. PRICE
EN2-7240-US	NBD SUPPORT FOR 7240-US (2 YEAR)	1.00	5,310.0000	5,310.00
EN2-LIC-1024-AP	SUPPORT FOR LIC-1024-AP (2 YEAR)	1.00	7,754.0000	7,754.00
EN2-LIC-PEFNG-1024	SUPPORT FOR LIC-PEFNG-1024 (2 YEAR)	1.00	6,082.0000	6,082.00
EN2-7240-US	NBD SUPPORT FOR 7240-US (2 YEAR)	1.00	5,310.0000	5,310.00
EN2-LIC-1024-AP	SUPPORT FOR LIC-1024-AP (2 YEAR)	1.00	7,754.0000	7,754.00
EN2-LIC-PEFNG-1024	SUPPORT FOR LIC-PEFNG-1024 (2 YEAR)	1.00	6,082.0000	6,082.00
EN2-AW-1000	SUPPORT FOR AW-1000 (2 YEAR)	1.00	5,169.0000	5,169.00
EN2-AW-EXP1-50	SUPPORT FOR AW-EXP1-50 (2 YEAR)	600.00	14.0000	8,400.00
EN2-7220-US	NBD SUPPORT FOR 7220-US (2 YEAR)	1.00	3,562.0000	3,562.00
EN2-7220-US	NBD SUPPORT FOR 7220-US (2 YEAR)	1.00	3,562.0000	3,562.00
EN2-7240-US	NBD SUPPORT FOR 7240-US (2 YEAR)	1.00	5,310.0000	5,310.00
EN2-7240-US	NBD SUPPORT FOR 7240-US (2 YEAR)	1.00	5,310.0000	5,310.00
EN2-7210-US	NBD SUPPORT FOR 7210-US (2 YEAR)	1.00	2,373.0000	2,373.00

1 / 06 05 0880 088 175 201

GR2

Please Remit Payment To:

Skyline Network Engineering, LLC
 6956-F Aviation Blvd.
 Glen Burnie, Md. 21061
 410-553-2600

Continued



Skyline Technology Solutions
 6956-F Aviation Blvd.
 Glen Burnie, MD 21061
 Phone: (410) 553-2600
 Fax: (410) 787-2551
 email address: ar@skylinenet.net
 Federal Tax ID: 37-1494684

INVOICE

Invoice No.	I100002943
Invoice Date	9/30/2016
Order No.	O100001549
Shipper ID	S100002958
Due Date	10/30/2016
Customer ID	CC PUB SCH
P.O. #:	01701546

BILL TO:

Carroll County Public Schools
 125 North Court Street
 Westminster, MD 21157

SHIP TO:

Gary Davis
 Carroll County Public Schools
 125 North Court Street
 Westminster, MD 21157

PAGE 2

PART NUMBER	DESCRIPTION	UNITS	PRICE	EXT. PRICE
EN2-CP-VA-25K	NBD SUPPORT FOR CP-VA-25K (2 YEAR)	2.00	7,669.0000	15,338.00
EN2-LIC-CP-EN-5K	SUPPORT FOR LIC-CP-EN-5K (2 YEAR)	1.00	11,297.0000	11,297.00
EN2-LIC-CP-EN-1K	SUPPORT FOR LIC-CP-EN-1K (2 YEAR)	1.00	3,766.0000	3,766.00
EN2-AW-200	SUPPORT FOR AW-200 (2 YEAR)	1.00	2,095.0000	2,095.00
EN2-3600-US	NEXT-DAY SUPPORT FOR 3600-US (2 YEAR)	1.00	1,814.0000	1,814.00
EN2-3600-US	NEXT-DAY SUPPORT FOR 3600-US (2 YEAR)	1.00	1,814.0000	1,814.00
EN2-7210-US	NBD SUPPORT FOR 7210-US (2 YEAR)	1.00	2,373.0000	2,373.00

Sales Total	110,475.00
Shipping & Handling	0.00
Misc. Charges	0.00
Tax Total	0.00
	<hr/>
	110,475.00
Less Paid Amount	0.00
TOTAL	110,475.00

Please Remit Payment To:

Skyline Network Engineering, LLC
 6956-F Aviation Blvd.
 Glen Burnie, Md. 21061
 410-553-2600



NO LIMITS.

6956 Aviation Blvd., Suite F
Glen Burnie, MD 21061
(410) 553-2600
FEIN: 37-1494684

INVOICE**Bill To:**

Carroll County Public Schools
125 North Court Street
Westminster, MD 21157

Contract Info	Contract No.	CCPS ERATE SO 01701546
	Project No.	
	P.O. Number	
Invoice Info	Number	0000005020
	Date	November 15, 2016
	Period	10/31/2016 to 10/31/2016
	Terms	Net 30 Days

	Hours/Quantity	Rate	Amount
GE6300845 Ethernet Routing Switch 5520-48T PWR Express Technology Support - Base Technical Support Service - SL845	8.00	\$178.00	\$1,424.00
GE6300A08 Ethernet Routing Switch 5530-24TFD Stackable Switch Express Technology Support - Base Technical Support Service - SLA08	2.00	\$336.00	\$672.00
GE6300CS8 ERS 4548GT, ERS 4548GT-PWR Express Technology Support - Base Technical Support Service - SLCA8	25.00	\$140.00	\$3,500.00
GE6300DS8 ERS 5698 Nortel Express Technology Support - Base Technical Support Service - SLDS8	5.00	\$578.00	\$2,890.00
GE6300DS9 ERS 5650 Nortel Express Technology Support - Base Technical Support Service - SLDS9	1.00	\$414.00	\$414.00
Total CCPS Erate Sales Order			\$8,900.00

Avaya Paid 11/17/16

Total Due**\$8,900.00**

Please Remit Payment to:
Skyline Technology Solutions
6956 Aviation Blvd., Suite F
Glen Burnie, MD 21061

If you have any questions, please contact us at: AR@skylinenet.net



NO LIMITS.

6956 Aviation Blvd., Suite F
Glen Burnie, MD 21061
(410) 553-2600
FEIN: 37-1494684

INVOICE**Bill To:**

Carroll County Public Schools
125 North Court Street
Westminster, MD 21157

Contract Info	Contract No.	CCPS ERATE SO 01701629
	Project No. P.O. Number	
Invoice Info	Number	000005020-A
	Date	November 15, 2016
	Period	10/31/2016 to 10/31/2016
	Terms	Net 30 Days

	Hours/Quantity	Rate	Amount
SV3-COR-EX3300-SITE Juniper Care 3-Year Prepaid Core Network License for EX300 (requires 100% coverage and minimum 10 units)	50.00	\$128.00	\$6,400.00
SV3-COR-EX4300SITE Juniper Care Core for EX4300 (June 2018 - July 2019)	20.00	\$266.00	\$5,320.00
SVC-ND-EX4200-24T Juniper Care NextDay Support for EX4200-24T (July 2016 - July 2019)	6.00	\$623.00	\$3,738.00
SVC-ND-EX4550 Juniper Care 3YR Prepaid NextDay Support for EX4550-32F (July 2016 - July 2019)	4.00	\$1,402.00	\$5,608.00
SVC-SD-QFX5100Q2 Juniper Care Same Day Support for QFX5100-24Q (Sept 2015 - July 2019)	2.00	\$8,804.00	\$17,608.00
SVC-SD-QFX5100S4 Juniper Care Same Day Support for QFX5100-48S (Sept 2015 - July 2019)	4.00	\$6,733.00	\$26,932.00
SVC-SWA-JS-ND-10 Juniper Care Software Advantage for JS-NETDIR-10 (Sept 2015 - July 2019)	1.00	\$369.00	\$369.00
SVC-SWA-JS-PLATFRM Juniper Care Software Advantage for JS-PLATFORM (Sept 2015 - July 2019)	1.00	\$1,510.00	\$1,510.00
Total CCPS Erate Sales Order			\$67,485.00

Total Due	\$67,485.00
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Applicant Name:
Service Provider (SP) Name:
Submitter Invoice Number:
SLD Invoice Number: 2777988
Funding Request Number (FRN): 1699098468
Description of Service for (FRN): BMIC

Month	Billing Account #	Bill Date	CURRENT CHARGES	Ineligible \$	description of ineligible	Ineligible Page #
12 mos.	Inv 0000004877	10/18/2016	\$ 44,280.00	\$22,140.00	1/2 of 2-yr support	1
12 mos.	Inv 100002951	10/14/2016	\$ 30,720.00	\$20,480.00	2/3 of 3-yr support	2
12 mos.	Inv 1000029463	9/30/2016	\$ 110,475.00	\$55,237.50	1/2 of 2-yr support	3 - 4
12 mos.	Inv 0000005020	11/15/2016	\$ 8,900.00			5
12 mos.	Inv 0000005020-A	11/15/2016	\$ 67,485.00	\$4,266.67	2/3 of 3-yr support for SV3-COR-EX3300-SITE	6
				\$5,320.00	SV3-COR-EX4300SITE Juniper Care Core for EX4300 (June 2018 - July 2019)	6
				\$5,607.00	2/3 of 3-yr support for SVC-ND-EX4200-24T Juniper Care NextDay Support for EX4550-32F (July 2016 - July 2019)	6
				\$13,014.61	34-months of 46-month support cost for SVC-SD-QFX5100Q2 Juniper Care Same Day Support for QFX5100-24Q (Sept 2015 - July 2019)	6
				\$19,906.26	34-months of 46-month support cost for SVC-SD-QFX5100S4 Juniper Care Same Day Support for QFX5100-48S (Sept 2015 - July 2019)	6
				\$272.74	34-months of 46-month support cost for SVC-SWD-JS-ND-10 Juniper Care Software Advantage for JS-NETDIR-10 (Sept 2015 - July 2019)	6
				\$1,116.09	34-months of 46-month support cost for SVC-SWA-JS-PLATFRM Juniper Care Software Advantage for JS-JS-PLATFRM (Sept 2015 - July 2019)	6
		Total	\$261,860.00	\$147,360.86		
		less ineligible	\$147,360.86			
		Adjusted Tot	\$114,499.14			
		Disc %	50.00%			
		Disc Amt	\$57,249.57			

Discounted Amount from Above
Requested Amt for FRN
Modification

\$57,249.57
\$56,630.58
No Deviation

Exhibit 2



Schools and Libraries Division

Form 472 (BEAR) Notification Letter

June 27, 2018

Donna Ridgeway
Skyline Network Engineering, LLC
6956 Aviation Boulevard
Suite F
Glen Burnie, MD 21061-2531

Re: Invoice Number - as assigned by USAC: 2777988
Service Provider Identification Number: 143030106
Reimbursement Form Number: 44143
Billed Entity Number: 126369

Person Garnet
CARROLL COUNTY SCHOOL DISTRICT
P.O. Box 563
Erate Elite Services
Owings Mills, MD 21117

Preferred Mode of Contact: E-mail at gperson@erateelite.com
Total Amount of Reimbursement Approved for Payment: \$31647.33

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR using the BEAR Online tool from the Apply Online area or Required Forms section of our website to request reimbursement for any unpaid lines.

If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN), - FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2015," AND
 - The exact text or the decision that you are appealing.
3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542. To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
 Schools and Libraries Division - Correspondence Unit
 30 Lanidex Plaza West
 PO Box 685
 Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

The maximum remaining amount available for each Funding Request Number (FRN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year. For example, if we successfully process a BEAR for an FRN, we will not approve a SPI for that same FRN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

CC: CARROLL COUNTY SCHOOL DISTRICT

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 161011907
Funding Request Number: 1699098468
Funding Year 2016: 07/01/2016 - 06/30/2017
Contract Number: Q0002351
Funding Commitment Decision: \$56630.58
Reimbursement Amount for this FRN: \$31647.33
Reimbursement Request Decision Explanation:
Ineligible service or product removed;



Exhibit 2

Schools and Libraries Division Correspondence Unit
30 Lanidex Plaza West
PO Box 685 Parsippany, NJ 07054-0685

TIME SENSITIVE MATERIAL

Person Garnet

CARROLL COUNTY SCHOOL DISTRICT

P.O. Box 563

Erate Elite Services

Owings Mills, MD 21117

Exhibit 3

Month	Billing Account #	Bill Date	CURRENT CHARGES	Ineligible \$	description of ineligible
12 mos.	Inv 0000004877	10/18/2016	\$44,280.00	\$22,140.00	1/2 of 2-yr support
12 mos.	Inv 100002951	10/14/2016	\$30,720.00	\$30,720.00	IE see tab 1
12 mos.	Inv 100002943	9/30/2016			
	EN2-7240-US		\$5,310.00		1/2 of 2-yr support
	EN2-LIC-PEFNG-1024,		\$6,082.00		1/2 of 2-yr support
	EN2-LIC-1024-AP		\$3,877.00		1/2 of 2-yr support
	EN2-7220-US		\$3,582.00		1/2 of 2-yr support
	EN2-7240		\$5,310.00		1/2 of 2-yr support
	EN2-7210-US		\$1,186.50		1/2 of 2-yr support
	EN2-3600-US		\$1,814.00		1/2 of 2-yr support
	EN2-7210-US		\$1,186.50		1/2 of 2-yr support
12 mos.	Inv 0000005020	11/15/2016	\$8,900.00		
12 mos.	Inv 0000005020-A-SV3-COR-EX4300SITE	11/15/2016	\$6,400.00	\$4,266.67	
	SV3-COR-EX4300SITE		\$5,320.00	\$3,546.67	
		Total	\$123,968.00	\$60,673.33	
		less ineligible	\$60,673.33		
		Adjusted Tot	\$63,294.67		
		Disc %	50.00%		
		Disc Amt	\$31,647.33		

Discounted Amount from Above	\$31,647.33
Requested Amt for FRN Modification	\$56,630.58
	\$24,983.25

Exhibit 4

