USAC APPEAL 2016 COMAD

Alva Public Library BEN:139952

504 7th Street

Alva, OK 73717-2247

580-327-1833

sandra@alva.lib.ok.us

Service Provider: Pioneer Long Distance, Inc. SPIN# **143001169**

FCC Form 471 Application # **161012676**

RE:

Overview: Alva Library planned to upgrade from 20mb to 50mb. The Library had two FRN’s, one for **20mb** FRN# **1699024932** and one for **50**mb FRN #**1699024838**.

The library upgraded from 20mb to 50mb on August 1, 2016. Pioneer’s billing cycle is from the 15th to the 15th of the month. FRN# 1699024932 (20mb) was used to invoice from 7/15 to 8/1. The amount charged to this FRN is correct.

The 50mb upgrade was completed and billed on 8/1. Pioneer then invoiced USAC from 8/2 through 9/15 using FRN #1699024838. This FRN was invoiced and paid by USAC. Both the original FCDL and 486 showed the total number of months of service was 12 months and the funding commitment request was $12,548.96. Pioneer invoiced USAC $1,603.98 from 8/1 to 9/15, which included the one-time charge of $80, partial charge of $484.90 (8/1-8/15), and the monthly charge of $1, 039.08 (8/16--9/16). The $484.90 from 8/2--8/15 is exactly the amount that the COMAD has questioned.

As you can see, (attachments), the original committed date was for 12 months. When the COMAD was received and research was initiated, it appears that someone changed the original number of months from 12 to 11 months. Of course, that changed the commitment amount.

USAC subtracted a month of funding from the original commitment from 12 to 11 months. Why?

What occurred, was that, the **20mb FRN** was used for **half-a month** (7/15—8/1). When the 50mb upgrade was completed, Pioneer invoiced USAC for **1 and ½ months** (8/2—9/15) and monthly after. Half a month on 20mb and 11 ½ months on 50mb equals 12 months. Since the amount of the COMAD is for ½ a month---not the full month that was mysteriously removed from the original 12 month commitment, the missing month is the first FRN for 20mb plus the ½ month included with the first invoice on the 50mb. It appears, that in an invoice review, the 20mb ½ month + the 50mb ½ month was overlooked and the committed 12 months was changed to 11 months (by someone from USAC)

Perhaps in PIA or invoice review, a “true-up” resulted in reducing the commitment by 1 month. Please review the attached documentation. We know USAC understands the different billing cycles and that the applicant can only be billed for 12 months annually.

Respectfully submitted,

Sandra Ott Hamilton, Director

Alva Public Library