

**FCC Request for Appeal and/or Waiver  
North Country SU 31 – BEN 122210 – FY2018**

November 13, 2019

Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554 (submitted electronically via ECFS)

**Request for Rule Waiver – CC Docket No. 02-6**

<b>Form 471 Number(s):</b>	181014713
<b>Funding Request Number (FRN):</b>	1899023967
<b>Funding Year:</b>	2018-2019
<b>Billed Entity Name:</b>	North Country SU 31
<b>BEN:</b>	122210

**Contact Information:**

<b>Contact Person Name:</b>	John Peters
<b>Contact Person Phone:</b>	(802)334-5847 ext.2018
<b>Contact Person Fax:</b>	(802)334-6528
<b>Contact Person E-Mail:</b>	john.peters@ncsuvt.org

**Decision being appealed:** Denial of Reimbursement Request

Per USAC instructions for Schools and Libraries, North Country SU 31, BEN 122210, requests a rule waiver of USAC's decision to deny funding for FCC Form 471 Number 181014713<sup>1</sup>, Funding Request Number 1899023967 for \$28,857.60 and to change the category 2 request in Item 1899023967.008 from Newport City Elementary School BEN #5036 to Newport Town School BEN #5040.

**Background:**

On 1 May 2019, North Country SU 31 received an information request from USAC for FY19 Form 471 submissions Category 2 budgets. Upon review of the inquiry, North Country SU 31 discovered that the FY18 Form 471 application number 181014713 Item 1899023967.008 was submitted as a Funding Request for Newport City Elementary School BEN #5036 in error. This

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<sup>1</sup> Attachment 1

## **FCC Request for Appeal and/or Waiver North Country SU 31 – BEN 122210 – FY2018**

funding request should have been submitted as a FRN for Newport Town School BEN #5040. As a result of this error, funding commitments and FY19 funding requests for Newport City Elementary School exceeded their Category 2 budget by \$2161.59. Immediately upon USAC's notification of this discrepancy, North Country SU 31 filed Appeal 139070 to correct the error.

On 23 October 2019, USAC issued a letter stating appeal 139070 was denied with the following rationale: "Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 5/1/2019. The Funding Commitment Decision Letter was issued on 4/20/2018. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal."

North Country SU 31 requests a Rule Waiver of this decision. North Country SU 31 contends that the rules for filing an appeal are rigid, arbitrarily short, and punitive given the following timeline and circumstances:

1. North Country SU 31 filed FCC Form 471 181014713 on 28 February 2018 and USAC issued the Funding Commitment Decision Letter 20 April 2018.
2. North Country SU 31 filed FCC Form 471 191006041<sup>2</sup> on 29 January 2019.
3. On 1 May 2019, USAC notified North Country SU 31 in an email Request for Information inquiry for FCC Form 471 191006041 that the Category 2 Budget for Newport City Elementary School had been exceeded by \$2161.59
4. In view of the 1 May 2019 USAC notification, North Country SU 31 immediately filed Appeal 139070<sup>3</sup>.
5. On 23 October 2019 USAC notified North Country SU 31 that appeal 13090 was denied<sup>4</sup>.

Since North Country SU 31 was unaware of the error prior to 1 May 2019, the decision to deny the appeal is rigidly based on arbitrary timelines that do not take into account the discovery of errors or remedies to correct them. To further compound the issue, the decision to deny the appeal is punitive since North Country SU 31, and more specifically, Newport City Elementary School's FY19 reimbursement requests for hardware upgrades were reduced thereby limiting the installation of equipment considered vital to increasing broadband access to the school. USAC's decision to deny appeal 139070 is in direct conflict and contrary to the FCC ruling in the **Bishop Perry Order (FCC 06-54) of 19 May 2006**

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<sup>2</sup> Attachment 2

<sup>3</sup> Attachment 3

<sup>4</sup> Attachment 4

**FCC Request for Appeal and/or Waiver  
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In Bishop Perry, the FCC directed USAC to “provide all E-rate applicants with an opportunity to cure ministerial or clerical errors” within their E-rate applications. Indeed, this case was exactly what the FCC had in mind when the language was crafted in the Bishop Perry decision.

If one thing is clear in the FCC’s ruling in Bishop Perry, it is that USAC should NOT impede the spirit and goals of the E-rate program through unending and rigid focus on procedure. Yet, in this case, USAC proceeded as if Bishop Perry was never released. To deny corrective action and withhold funding from the district because of a very simple and easily correctable mistake is a punitive action that is devastating to the life and spirit of the E-rate program, the very life and spirit created and encouraged by the FCC’s own words in Bishop Perry.

**Summary and Requested Action:** North Country SU 31 requests the FCC grant our request for a Rule Waiver of USAC’s decision to deny funding for FCC Form 471 Number 181014713, Funding Request Number 1899023967 for \$28,857.60 and to change the category 2 request in Item 1899023967.008 from Newport City Elementary School BEN #5036 to Newport Town School BEN #5040. North Country SU 31 is urging you to review this application and reverse the USAC’s decision to deny appeal 139070. North Country SU 31 lies on the northern border of Vermont with Canada. North Country SU 31 comprises a rural and isolated set of districts in Orleans and Essex counties with the highest poverty rates in Vermont. North Country SU 31 has experienced a consistent Free and Reduced Student Lunch rate of 64% and E-Rate Reimbursement rate of 80% for over 10 years. With limited access to broadband resources, many of our students do not have access to broadband at home. School budgets are tight and the loss of funding on consecutive years due to an administrative error has a detrimental effect on students in this region.

Respectfully Submitted,

John Peters  
Director of Technology  
North Country Supervisory Union  
121 Duchess Ave Suite A  
Newport, VT 05855  
(802)334-5847 ext. 2018  
[John.Peters@ncsuvt.org](mailto:John.Peters@ncsuvt.org)



## Description of Services Ordered and Certification Form 471

### FCC Form 471

#### Application Information

**Nickname** NCSU 1819 Wireless Access Points **Application Number** 181014713  
**Funding Year** 2018 **Category of Service** Category 2

#### Billed Entity

NORTH COUNTRY SU 31  
121 DUCHESS AVE SUITE A NEWPORT VT 0585  
5 - 5517  
802-334-5847 x 2018  
John.Peters@ncsuv.org

#### Contact Information

JOHN PETERS  
802-334-5847  
john.peters@ncsuv.org

**Billed Entity Number** 122210  
**FCC Registration Number** 0011902756  
**Applicant Type** School District

**Holiday/Summer Contact Information** JOHN PETERS Email john.peters@ncsuv.org Phone Number 802-334-5847 AIME  
FORBES Email aime.forbes@ncsuv.org Phone Number 802-334-5847

#### Entity Information

##### School District Entity - Details

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	School District Attributes	Endowment
122210	NORTH COUNTRY SU 31	Rural	SU031	SU031		Public School District	None

#### Related Entity Information

##### Related Child School Entity - Details

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
5013	COVENTRY VILLAGE SCHOOL	Rural	SU031	PS077			Public School	None
5017	NORTH COUNTRY UNION JUNIOR HIGH SCHOOL	Rural	SU031	PS364		None	Public School	None
5018	DERBY ELEMENTARY SCHOOL	Rural	SU031	PS084		None	Public School	None
5019	HOLLAND ELEMENTARY SCHOOL	Rural	SU031	PS144			Public School	None
5029	BRIGHTON ELEMENTARY SCHOOL	Rural	SU031	PS044			Public School	None

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
5030	LOWELL GRADED SCHOOL	Rural	SU031	PS166			Public School	None
5036	NEWPORT CITY ELEMENTARY SCHL	Rural	SU031	PS204			Public School	None
5039	NORTH COUNTRY UNION HIGH SCHOOL	Rural	SU031	PS208		None	Public School	None
5040	NEWPORT TOWN SCHOOL	Rural	SU031	PS205		None	Public School	None
5041	TROY SCHOOL	Rural	SU031	PS302			Public School	\$0.00
5042	JAY WESTFIELD JOINT ELEMENTARY SCHOOL	Rural	SU031	PS374		None	Public School	None
5052	CHARLESTON ELEMENTARY SCHOOL	Rural	SU031	PS067			Public School	None
16037006	NORTH COUNTRY SCHOOLS ALTERNATIVE PROGRAM	Rural	SU031	PS208		None	Public School	None
16065422	NCCC LAND LAB	Rural	SU031	VC010		None	Public School	None

### Related Child School Entity - Discount Rate Calculation Details

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
5013	COVENTRY VILLAGE SCHOOL	Rural	141	N/A	76.00%
5017	NORTH COUNTRY UNION JUNIOR HIGH SCHOOL	Rural	232	N/A	
5018	DERBY ELEMENTARY SCHOOL	Rural	436	N/A	
5019	HOLLAND ELEMENTARY SCHOOL	Rural	47	N/A	67.00%
5029	BRIGHTON ELEMENTARY SCHOOL	Rural	86	N/A	98.00%
5030	LOWELL GRADED SCHOOL	Rural	108	N/A	82.00%
5036	NEWPORT CITY ELEMENTARY SCHL	Rural	361	N/A	76.00%
5039	NORTH COUNTRY UNION HIGH SCHOOL	Rural	710	N/A	
5040	NEWPORT TOWN SCHOOL	Rural	105	N/A	
5041	TROY SCHOOL	Rural	186	N/A	80.00%
5042	JAY WESTFIELD JOINT ELEMENTARY SCHOOL	Rural	79	N/A	
5052	CHARLESTON ELEMENTARY SCHOOL	Rural	117	N/A	75.00%
16037006	NORTH COUNTRY SCHOOLS ALTERNATIVE PROGRAM	Rural	38	N/A	
16065422	NCCC LAND LAB	Rural	92	N/A	

### Related School District NIFs

School District BEN	School District Name	NIF BEN	NIF Name
122210	NORTH COUNTRY SU 31	17004774	NORTH COUNTRY SUPERVISORY UNION

### Discount Rate

School District Enrollment	School District NSLP Count	School District NSLP Percentage	School District Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
2738	1889	69.0%	Rural	80%	80%	0%

## Funding Request for FRN #1899023967

**Funding Request Nickname:** NCSU 1819 WAPs

**Service Type:** Basic Maintenance of Internal Connections

### Agreement Information - Contract

<b>Contract Number</b>		<b>Account Number</b>	
<b>Establishing FCC Form 470</b>	180004914	<b>Service Provider</b>	Ormsby's Computer Systems, Inc. (SPN: 143006474)
<b>Was an FCC Form 470 posted for the product and/or services you are requesting?</b>	Yes	<b>Based on State Master Contract?</b>	No
<b>Award Date</b>	February 13, 2018	<b>Based on a multiple award schedule?</b>	No
<b>How many bids were received for this contract?</b>	1	<b>Includes Voluntary Extensions?</b>	No
<b>What is the service start date?</b>	July 01, 2018	<b>Remaining Voluntary Extensions</b>	
		<b>Total Remaining Contract Length</b>	
		<b>What is the date your contract expires for the current term of the contract?</b>	June 30, 2019

Document Name	Document Description
Ormsby 1819 NCSU WAP Committal.pdf	Purchase of WAPs for multiple schools

### Pricing Confidentiality

**Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract?** No

**Narrative**

SCOPE OF WORK A. Provide 100 Wireless Access Points preferably HPEAruba 1. Shall interface with existing Aruba Access Points Virtual Controller 2. Multi radio supporting 802.11nac 2x223x33 MU-MIMO Dual Radio Integrated Antenna AP 3. Multi-VLAN configurable 4. IEEE 802.3af PoE or IEEE 802.3ac PoE+ capable B. Provide 9 Wireless Access Points preferably HPEAruba 1. Shall interface with existing Aruba Access Points Virtual Controller 2. Multi radio supporting 802.11nac Dual 4x44 MU-MIMO Radio Integrated Antenna AP 3. Multi-VLAN configurable 4. IEEE 802.3af PoE or IEEE 802.3ac PoE+ capable C. All delivery of equipment must be before July 31, 2018.

Line Item # 1899023967.001

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      11

Cost Calculation for FRN Line Item # 1899023967.001

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$3,388.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$3,388.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$3,388.00
Pre-Discount Extended Eligible Line Item Cost	= \$3,388.00

Recipients of Services

BEN	Name	Amount
5029	BRIGHTON ELEMENTARY SCHOOL	\$3,388.00



Line Item # 1899023967.002

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      11

Cost Calculation for FRN Line Item # 1899023967.002

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$3,388.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$3,388.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$3,388.00
Pre-Discount Extended Eligible Line Item Cost	= \$3,388.00

Recipients of Services

BEN	Name	Amount
5052	CHARLESTON ELEMENTARY SCHOOL	\$3,388.00

Line Item # 1899023967.003

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      9

Cost Calculation for FRN Line Item # 1899023967.003

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$5,580.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$5,580.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$5,580.00
Pre-Discount Extended Eligible Line Item Cost	= \$5,580.00

Recipients of Services

BEN	Name	Amount
5039	NORTH COUNTRY UNION HIGH SCHOOL	\$5,580.00

Line Item # 1899023967.004

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      25

Cost Calculation for FRN Line Item # 1899023967.004

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$7,700.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$7,700.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$7,700.00
Pre-Discount Extended Eligible Line Item Cost	= \$7,700.00

Recipients of Services

BEN	Name	Amount
5036	NEWPORT CITY ELEMENTARY SCHL	\$7,700.00

Line Item # 1899023967.005

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      12

Cost Calculation for FRN Line Item # 1899023967.005

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$3,696.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$3,696.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$3,696.00
Pre-Discout Extended Eligible Line Item Cost	= \$3,696.00

Recipients of Services

BEN	Name	Amount
5013	COVENTRY VILLAGE SCHOOL	\$3,696.00



Line Item # 1899023967.006

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      6

Cost Calculation for FRN Line Item # 1899023967.006

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$1,848.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$1,848.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$1,848.00
Pre-Discount Extended Eligible Line Item Cost	= \$1,848.00

Recipients of Services

BEN	Name	Amount
5019	HOLLAND ELEMENTARY SCHOOL	\$1,848.00

Line Item # 1899023967.007

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      5

Cost Calculation for FRN Line Item # 1899023967.007

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$1,540.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$1,540.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$1,540.00
Pre-Discount Extended Eligible Line Item Cost	= \$1,540.00

Recipients of Services

BEN	Name	Amount
5042	JAY WESTFIELD JOINT ELEMENTARY SCHOOL	\$1,540.00

Line Item # 1899023967.008

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      12

Cost Calculation for FRN Line Item # 1899023967.008

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$3,696.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$3,696.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$3,696.00
Pre-Discount Extended Eligible Line Item Cost	= \$3,696.00

Recipients of Services

BEN	Name	Amount
5036	NEWPORT CITY ELEMENTARY SCHL	\$3,696.00

Line Item # 1899023967.009

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      8

Cost Calculation for FRN Line Item # 1899023967.009

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$2,464.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$2,464.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$2,464.00
Pre-Discount Extended Eligible Line Item Cost	= \$2,464.00

Recipients of Services

BEN	Name	Amount
5030	LOWELL GRADED SCHOOL	\$2,464.00



Line Item # 1899023967.010

Product and Service Details

Type of Product Being Maintained      Basic Maintenance of Internal Connections

Total Quantity of Equipment Maintained      9

Cost Calculation for FRN Line Item # 1899023967.010

Monthly Cost	
Monthly Recurring Cost	\$0.00
Monthly Recurring Ineligible Costs	- \$0.00
Monthly Recurring Eligible Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Cost	\$2,772.00
One-time Ineligible Costs	- \$0.00
One-time Eligible Cost	= \$2,772.00
Summary	
Total Eligible Recurring Costs	\$0.00
One-time Eligible Costs	+ \$2,772.00
Pre-Discount Extended Eligible Line Item Cost	= \$2,772.00

Recipients of Services

BEN	Name	Amount
5041	TROY SCHOOL	\$2,772.00

FRN Calculation for FRN #1899023967

Monthly Charges	
Total Monthly Recurring Charges	\$0.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$0.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$0.00

One-Time Charges	
Total One-Time Charges	\$36,072.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$36,072.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$0.00
Total Eligible Pre-Discount One-Time Charges	+ \$36,072.00
Total Pre-Discount Charges	= \$36,072.00
Discount Rate	80%
Funding Commitment Request	= \$28,857.60

## Connectivity Questions

### District/System-wide Internet Access Questions

Does your school district currently aggregate Internet access for the entire district(as opposed to buying Yes Internet access on a building-by-building basis)?

**Download Speed** 1.00 **Download Speed Units** Gbps

**Upload Speed** 1.00 **Upload Speed Units** Gbps

### Per Entity Basis Questions

**Entity Name** NORTH COUNTRY SU 31 **Entity Number** 122210

BEN	Entity Name	Download	Units	Upload	Units	Connection	Wifi Sufficient	Barriers to Robust Network
5013	COVENTRY VILLAGE SCHOOL	50.00	Mbps	50.00	Mbps	Fiber	Mostly	Outdated equipment
5017	NORTH COUNTRY UNION JUNIOR HIGH SCHOOL	100.00	Mbps	100.00	Mbps	Fiber	Mostly	No barriers
5018	DERBY ELEMENTARY SCHOOL	100.00	Mbps	100.00	Mbps	Fiber	Completely	No barriers
5019	HOLLAND ELEMENTARY SCHOOL	10.00	Mbps	10.00	Mbps	Copper	Mostly	Equipment too costly
5029	BRIGHTON ELEMENTARY SCHOOL	10.00	Mbps	10.00	Mbps	Copper	Mostly	Physical structure or layout of building(s)
5030	LOWELL GRADED SCHOOL	10.00	Mbps	10.00	Mbps	Copper	Mostly	Physical structure or layout of building(s)
5036	NEWPORT CITY ELEMENTARY SCHL	150.00	Mbps	150.00	Mbps	Fiber	Completely	Physical structure or layout of building(s)
5040	NEWPORT TOWN SCHOOL	10.00	Mbps	10.00	Mbps	Copper	Mostly	Physical structure or layout of building(s)
5041	TROY SCHOOL	50.00	Mbps	50.00	Mbps	Fiber	Mostly	Physical structure or layout of building(s)
5042	JAY WESTFIELD JOINT ELEMENTARY SCHOOL	10.00	Mbps	10.00	Mbps	Copper	Mostly	Physical structure or layout of building(s)
5052	CHARLESTON ELEMENTARY SCHOOL	10.00	Mbps	10.00	Mbps	Copper	Mostly	Physical structure or layout of building(s)
16037006	NORTH COUNTRY SCHOOLS ALTERNATIVE PROGRAM	50.00	Mbps	50.00	Mbps	Fiber	Mostly	No barriers
16065422	NCCC LAND LAB	10.00	Mbps	10.00	Mbps	Copper	Mostly	Physical structure or layout of building(s)
5039	NORTH COUNTRY UNION HIGH SCHOOL	1.10	Gbps	1.10	Gbps	Fiber	Completely	No barriers

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	\$36,072.00
Total funding commitment request amount on this FCC Form 471	\$28,857.60
Total applicant non-discount share of the eligible amount	\$7,214.40
Total budgeted amount allocated to resources not eligible for E-rate support	\$700,000.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$707,214.40
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share?	No

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

**Authorized Person**

<b>Title:</b>	Director of Technology	<b>Name:</b>	JOHN PETERS
<b>Phone:</b>	802-334-5847	<b>Email:</b>	john.peters@ncsuvt.org
<b>Address:</b>	121 DUCHESS AVE SUITE A NEWPORT VT 05855	<b>Employer:</b>	JOHN PETERS

**Certified Timestamp** 28-Feb-2018 10:48:05 EST

[Records](#) / [Customer Service Cases](#)

# #273869 - Funding Request Wrong School Error

REOPEN CASE

Summary

News

Related Actions

## Case Details

<b>Topic</b>	FCC Form 471 - C2 Budget Calculation	<b>Form Type</b>	FCC Form 471
<b>Status</b>	Closed	<b>Form Number</b>	1899023967
<b>Priority</b>	Medium	<b>Created By</b>	JOHN PETERS
<b>Inquiry Type</b>	Web	<b>Created On</b>	4/27/2019 12:15 PM EDT
		<b>Organization</b>	<a href="#">NORTH COUNTRY SU 31</a>

## Case Description

**Description** Item 1899023967.008 is being charged against the Category 2 budget of Newport City Elementary School BEN #5036 in error. It should be billed against the Category 2 budget of Newport Town School BEN #5040. This error has caused a situation where Newport City's commitments have exceeded their Cat 2 Budget. How can I fix this error so the Cat 2 budgets are correctly charged and Newport City can have necessary upgrades funded.

## Case Artifacts

### Documents

Name	Uploaded By	Upload Date
No items available		

### Attachments

Attachment	Attachment Type
No items available	

## Case Thread

User	Note	Date

User	Note	Date
USAC	<p>Any decision made by USAC or the Schools and Libraries Program regarding eligibility, funding, or payment recovery, can be appealed by the impacted party.</p> <p>USAC must receive a complete appeal within 60 days of the issuance of the decision by USAC; e.g., a FCDL must be appealed within 60 days of the date of the FCDL. To allow sufficient time for review, USAC encourages impacted parties to submit appeals as soon as possible following USAC's decision. Failure to provide all required documentation within 60 days of USAC's decision will result in dismissal of the appeal. See 47 C.F.R. Section 54.719-54.725 for the FCC's rules on filing an appeal.</p> <p>There are three paths to beginning an appeal in EPC:</p> <ol style="list-style-type: none"> <li>1. You can reach it from the Landing Page. Click Appeal in the list of options at the top right, or</li> <li>2. You can reach it from the top-right drop-down menu on the Entity Summary Page. Click Create Appeal, or</li> <li>3. You can reach it from the Related Actions section of the Entity Summary Page. Click Create Appeal.</li> </ol> <p>The remaining steps are as follows:</p> <ol style="list-style-type: none"> <li>1. On the first page, enter a Nickname for your appeal and choose the appropriate Funding Year.</li> <li>2. Select the appropriate options under What type of decision you would like to appeal?, "Appeal Type", and "Appeal Category".</li> <li>3. Enter the name of the Main Contact Person. Click Continue.</li> <li>4. On the next page, under Choose Search Method, choose Search by FRN or Search by Post-Commitment Request. <ol style="list-style-type: none"> <li>a. If you chose "earch by FRN, use the filters to find the FRN(s) for which you would like to submit an appeal. <ol style="list-style-type: none"> <li>i. Place a checkmark next to the FRNs and click Add (#) FRNs.</li> <li>ii. To remove an FRN, place a checkmark next to it and select Remove (#) FRNs.</li> <li>iii. After all appropriate FRNs are listed under Selected FRNs, click Continue.</li> </ol> </li> <li>b. If you chose Search by Post-Commitment Request, use the filters to find the post-commitment request for which you would like to submit an appeal. <ol style="list-style-type: none"> <li>i. The system will automatically select all of the FRNs associated with the selected post-commitment request. If any FRNs should be excluded, check the box(es) next to the FRN(s) under the section FRNs associated with Post-Commitment Request and click Remove (#) FRNs.</li> <li>ii. Once only the correct FRNs are listed under FRNs associated with Post-Commitment Request click Continue.</li> </ol> </li> </ol> </li> <li>5. On the next page, you may enter up to 2000 characters in the Narrative field to describe your appeal.</li> <li>6. Attach any supporting documentation using the Upload Document section.</li> <li>7. Click Submit and confirm by clicking Yes in the pop-up.</li> </ol> <p>Additional information about appeals appears on the following page on the Schools and Libraries website: <a href="http://www.usac.org/sl/about/program-integrity/appeals.aspx">http://www.usac.org/sl/about/program-integrity/appeals.aspx</a></p>	5/1/2019 2:52 PM EDT
JOHN PETERS	<p>I am trying to complete a Form 500; however, I am receiving an error that there is no equipment associated with the funding request. I find this a little disconcerting since the FRN was approved and an FCDL was issued.</p>	5/1/2019 2:23 PM EDT



User	Note	Date
USAC	<p>My apologies... I sent you the incorrect response for your issue. I am so sorry for the confusion that I caused.</p> <p>- The correct response is to submit a Form 500.</p> <p>Applicants can file an FCC Form 500 after funding has been committed to accomplish one or more of the following:</p> <ul style="list-style-type: none"><li>• To adjust the Funding Year Service Start Date reported on a previously filed FCC Form 486 for this Funding Year</li><li>• To adjust the Contract Expiration Date listed on its FCC Form 471 application for this Funding Year</li><li>• To request an extension of the service delivery and installation deadline for non-recurring services</li><li>• To cancel irrevocably and totally a Funding Request Number (FRN)</li><li>• To reduce irrevocably the amount of a Funding Request Number (FRN)</li><li>• To notify USAC of an equipment transfer within the three year prohibition on equipment transfers due to a temporary or permanent entity closure</li></ul> <p>For more information regarding the FCC Form 500, please refer to the following page on our website: <a href="http://www.usac.org/sl/applicants/before-youre-done/500-filing.aspx">http://www.usac.org/sl/applicants/before-youre-done/500-filing.aspx</a></p>	5/1/2019 1:50 PM EDT

User	Note	Date
USAC	<p>A Service Substitution is a minor change in the technical components of the products and/or services specified in the FCC Form 471, Description of Services Ordered and Certification Form. In certain limited circumstances, applicants or service providers may request and be approved for service substitutions.</p> <p>Any cost change submitted by an applicant in a Service Substitution request will be considered a request for modification of the funding commitment, just as though the applicant had submitted an FCC Form 500, Funding Commitment Adjustment Request Form. Therefore, when USAC approves a request that includes a cost decrease, we will adjust the commitment for the affected funding request.</p> <p>These requests must meet the following criteria (specified in FCC rules) in order for USAC to approve them.</p> <ul style="list-style-type: none"> <li>• The substituted services or products have the same functionality as the services or products contained in the original proposal.</li> <li>• The substitution does not violate any contract provisions or state or local procurement laws.</li> <li>• The substitution does not result in an increase in the percentage of ineligible services or functions.</li> <li>• The requested change is within the scope of the establishing FCC Form 470, including any Requests for Proposal (RFP), for the original service.</li> </ul> <p>If a service substitution results in a change in the pre-discount price for the supported service, Schools and Libraries (E-rate) Program funding will be based on the pre-discount price of the service for which support was originally requested or the pre-discount price of the new, substituted service, whichever is lower.</p> <p>For more information, refer to the Service Substitutions page of the Schools and Libraries website: <a href="http://usac.org/sl/applicants/before-youre-done/service-substitutions.aspx">http://usac.org/sl/applicants/before-youre-done/service-substitutions.aspx</a></p> <p>If you have any questions or believe this case was closed incorrectly, please re-open this case or contact us at (888)203-8100.</p> <p>Thank you, Danielle Universal Service Administrative Company (USAC) Client Service Bureau</p>	4/29/2019 10:14 AM EDT

## Case Contact

**Case Contact** JOHN PETERS



[Records](#) / [Appeals](#)

# NCSU-1819-Wireless Access Points - #139070

[Summary](#) [Associated FRNs](#) [Review Inquiries](#) [News](#) [Related Actions](#)

In-Review	Outreach	Wave Ready	Committed
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## Appeal Information

[View Status \(+\)](#)

**Funding Year** 2018

**Submitting Organization** [NORTH COUNTRY SU 31 \(BEN: 122210\)](#)

**Created By** JOHN PETERS

**Created On** 5/1/2019 3:35 PM EDT

## Main Contact

**Name** JOHN PETERS

**Email** [john.peters@ncsuvt.org](mailto:john.peters@ncsuvt.org)

**Phone Number** 802-334-5847

## Narrative

Form 471 application number 181014713 Item 1899023967.008 was submitted as a Funding Request for Newport City Elementary School BEN #5036 in error. This funding request should have been submitted as a FRN for Newport Town School BEN #5040. As a result of this error, funding commitments and requests for Newport City Elementary School have exceeded their Category 2 budget.

In addition the funding requests for Form 471 application number 181014713 are listed as Basic Maintenance of Internal Connections instead of Internal Connections since the funding requests were submitted for Wireless Access Points. This error should be corrected as well; although the application was originally successfully submitted and a FCDL was issued on April 20, 2018.

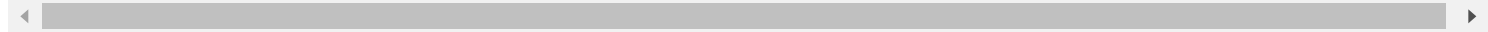
In trying to resolve these issues, I have opened Customer Service Case #273869. The last client service representative I spoke with directed me to file an appeal. I did not discover these errors until I filed funding requests for services for FY19 and discovered that the Newport City Elementary Category 2 budget had been exceeded.

## Appeal Details

**Decision appealed by applicant** Funding Commitment Decision Letter

If you wish to modify or cancel your appeal, or, if you have any questions about your appeal, please contact the E-rate Program's Client Service Bureau (CSB) at (888) 203-8100.

[View Supporting Documentation \(+\)](#)



# **Revised Funding Commitment Decision Letter**

## **Funding Year 2018**

**Contact Information:**

JOHN PETERS  
NORTH COUNTRY SU 31  
121 DUCHESS AVE SUITE A  
NEWPORT, VT 05855  
[john.peters@ncsuvt.org](mailto:john.peters@ncsuvt.org)

**BEN:** 122210**Post Commitment Wave:** 43

## **Totals**

Original Commitment Amount	\$28,857.60
<b>Revised Commitment Amount</b>	<b>\$28,857.60</b>

## **What is in this letter?**

**Thank you for submitting your post-commitment request for Funding Year 2018 Schools and Libraries Program (E-rate) funding.** Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

## **Next Steps**

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).



**BEN Name:** NORTH COUNTRY SU 31

**BEN:** 122210

**Post Commitment Wave:** 43

- o **If USAC approved funding on an FRN in your original FCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
  - o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
- **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
  - **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
  - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time**, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

## How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

**Note:** The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC**, visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.
- **To request a waiver of the FCC's rules or appeal USAC's appeal decision**, please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System](#) (ECFS). Include your contact information, a statement that your filing is a waiver request,



**BEN Name:** NORTH COUNTRY SU 31

**BEN:** 122210

**Post Commitment Wave:** 43

identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

## **Obligation to Pay Non-Discount Portion**

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

## **Notice on Rules and Funds Availability**

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



**BEN Name:** NORTH COUNTRY SU 31

**BEN:** 122210

**Post Commitment Wave:** 43

## Revised Funding Commitment Decision Overview

### Funding Year 2018

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1899023967	Ormsby's Computer Systems, Inc.	Appeals	\$28,857.60	Denied



**BEN Name:** NORTH COUNTRY SU 31

**BEN:** 122210

**Post Commitment Wave:** 43

<b>Post Commitment Request Number:</b> 139070	<b>Post Commitment Request Type:</b> Appeals	<b>Post Commitment Decision:</b> Denied
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<b>FRN:</b> 1899023967	<b>Service Type:</b> Basic Maintenance of Internal Connections	<b>Original Status:</b> Funded	<b>Revised Status:</b> Funded
<b>FCC Form 471: 181014713</b>			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$36,072.00
Total Pre-Discount Charges		\$36,072.00	
Discount Rate		80.00%	
Revised Committed Amount		\$28,857.60	

Dates	
Service Start Date	7/1/2018
Contract Expiration Date	6/30/2019
Contract Award Date	2/13/2018
Service Delivery Deadline	9/30/2019
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	Ormsby's Computer Systems, Inc.
SPIN (498ID)	143006474
Contract Number	
Account Number	
Establishing FCC Form 470	180004914

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

<b>Revised Funding Commitment Decision Comments:</b>
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<b>Post Commitment Rationale:</b>
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Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 5/1/2019. The Funding Commitment Decision Letter was issued on 4/20/2018. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.