

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

November 21, 2019

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

**Request for Appeal and/or Rule Waiver – CC Docket No. 02-6**

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

**Contact Information:**

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

**Reference:** Phone Conversation between Mark Nadel, FCC, and John Peters, North Country SU 31 of 19 Nov 2019

Pursuant to the referenced phone conversation, I have checked my records regarding the accompanying RFP attached to Form 470 180004914. Although I had posted previous RFP's on the Vermont Bid System site, unfortunately, I did not post this one. However, I did receive inquiries from two vendors. I only received a bid proposal from one.

In our phone call, Mr. Nadel referenced that the hardware vendors may only scan Form 470's marked Internal Connections and that may cause a situation where vendors may be excluded from bidding, creating an unfair situation. After a conversation I had with a vendor/reseller, I respectfully disagree with that assessment for this reason: the vendor/reseller stated that many of the large companies review all RFP's attached to Form 470's, regardless of the subcategory checked, and that this vendor/reseller does not submit bid proposals on Form 470's without RFP's attached. As part of our RFP process, we require all prospective bidders to sign a verification statement that they understand our requirements before we will consider their proposals.

To be fair, there are only three entities within 75 miles (via roads) of North Country SU 31 with SPIN numbers, one vendor/reseller and two electrical contractors. I explained to the electrical contractors how to get SPIN numbers in 2015 after we denied their bid proposals, which were responses to an RFP I had posted on the Vermont Bid System website, because they did not have them. In our RFP's we generally ask for installation services, which means that we incur hefty trip charges from vendors and contractors that have to travel to us to perform installation services. In order to be fiscally responsible, this has a big influence on who we choose to provide us with goods and services.

Geographically, North Country SU 31 is in the Northeast corner of Vermont along the international border with Canada. Due to our location, North Country SU 31 lies in an area where it is "not easy to get here from there" in Vermont or surrounding states. While we are geographically large

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in area for Vermont, our schools are small, rural and experience high poverty. As I said in my Request for Appeal and Waiver, denial of our request will have a devastating effect on our local budgets.

Respectfully submitted,

John E. Peters