

October 17, 2014

CC Docket No. 02-6
FCC Form 471 # 829059
FCC Form 471 # 894589

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Dear Ms. Dortch:

Please find the enclosed Petition for Waiver needed for continued access to E-rate funding for support of telecommunications and Internet Access services needed to provide educational services to the students of Moore Public Schools in the aftermath of the destruction to buildings by the EF5 tornado that struck Moore Public Schools on May 20, 2013.

Respectfully submitted,



Jane Kellogg, Consultant

Enclosures

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

In the Matter of)
)
Schools and Libraries Universal Service)
Support Mechanism) CC Docket No. 02-6
)
PETITION FOR WAIVER)
Moore Public Schools)
E-Rate FY2012 and FY2013 – Entity Changes)
)

October 17, 2014

Moore Public Schools
Moore, Oklahoma
BEN 139842

Submitted by:
Jane Kellogg
Deborah Sovereign

Kellogg & Sovereign Consulting, LLC
1101 Stadium Drive
Ada, OK 74820

Introduction:

The focus of this request for waiver is to provide the information necessary for the Federal Communications Commission to be able to approve:

(1) use of approved E-rate funding for Priority One services at all of the sites in the district including the temporary swing sites and temporary non-instructional facilities requested on FY2012 FCC Form 471 application # 829059 and FY2013 FCC Form 471 application # 894589

(2) special exception of the eligible entity rules to allow Dell Computer to continue to house the Moore Public Schools servers and serve as the head end of the Moore Public Schools network until other options can be identified and

(3) approve the use of classrooms in the Moore High School by FEMA and the American Red Cross while they provide disaster relief assistance.



In the aftermath of the May 20, 2013, EF5 tornado, Moore Public Schools had to move the head end of the network to temporary network facilities located at Dell Computer, allow the use of classrooms in the High School by FEMA and the American Red Cross while they provided disaster relief assistance, and temporarily relocated high bandwidth circuits and other telecommunications access to buildings not previously included on the E-rate applications including a school that was not properly equipped to house

elementary students, a church, leased office space, and a commercial building that is serving as the District's head end of the network as well as housing the servers damaged in the tornado.

Background:

On the afternoon of May 20, 2013, an EF5 tornado, with peak winds estimated at 210 miles per hour (340 km/h), struck Moore, Oklahoma, and adjacent areas, killing 24 people and injuring 377 others. The tornado was part of a larger weather system that had produced several other tornadoes over the previous two days. The tornado touched down west of Moore at 2:56 p.m. CDT staying on the ground for 39 minutes over a 17-mile (27 km) path, crossing through a heavily populated section of Moore wiping out two schools and the Technology Center plus causing damage to Highland East Junior High and the Administration Building. The tornado was 1.3 miles (2.1 km) wide at its peak.

Plaza Towers Elementary School

BEN 83897, original address 852 SW 11th Street, Moore, OK 73160

- *Changed address and name on BEN 83897 to Plaza Towers ES Swing Site on Broadway, 400 N. Broadway, Moore, OK 73160 (old Central ES on same campus with Central Jr. High).*
- *For E-Rate FY2014, Created new entity # 16077412, New Plaza Towers Elementary School, 852 SW 11th, Moore OK 73160, for New Plaza Towers Elementary School to be built on original school site.*

One of the many buildings to be totally destroyed was the Plaza Towers Elementary School. The tornado tore the roof off the school about 3 pm local time. A teacher told a reporter that she draped herself on top of six children in a bathroom to shelter them.

At Plaza Towers, the fourth, fifth and sixth grades were evacuated to a church about a quarter-mile away from the 440-student school before the tornado touched down. However, students in kindergarten through third grade sheltered in place. Some of those students had been in a hallway when the twister struck, others in bathrooms. Sadly, several of these children did not make it out alive.



Above are two sets of satellite pictures of the destroyed Plaza Towers Elementary School in Moore, Okla., before and after the tornado hit.

It is hard to believe as you look at the pictures we've included in this request for waiver that anyone survived such a total destruction of just one of the two school buildings destroyed. The link below takes you to a video and story that appeared in the Oklahoma City Paper, The Oklahoman regarding this <http://newsok.com/oklahoma-tornadoes-children-endured-tornado-in-hall-of-plaza-towers-elementary/article/3833336>.

Quotes of survivors from Plaza Towers Elementary:

"I had to hold on to the wall to keep myself safe because I didn't want to fly away in the tornado," one girl told the station.

James Rushing, who lives across the street, ran to the school to take shelter, thinking the building would be safer than his own home. "About two minutes after I got there, the school started coming apart," he told The Associated Press.

"The twister — deemed at least an EF5, the second-highest strength, by the National Weather Service — tore the roof off the building and knocked down its walls."

"A truck that was tossed through the air landed in the spot where the school's main office would have been", a TV reporter said. "Books were scattered across pancaked slabs of concrete."

A crying man described to a reporter how he and others pulled a car off a teacher in the front of the building and found three children she had shielded with her body.

"Good job, teach," the man said, his voice choked with emotion.

Briarwood Elementary School

BEN 83922 - original address 14901 South Hudson, Oklahoma City, OK 73170

- *Changed name and address on BEN 83922 to Briarwood ES Swing Site on Western, 16001 South Western, Oklahoma City, OK 73170 (Emmaus Baptist Church Building).*
- *For E-Rate FY2014, created new entity # 16077411, New Briarwood Elementary School, 14901 S. Hudson, OKC, OK 73170 for New Briarwood Elementary School to be rebuilt on the same site.*



At Briarwood, the scene was much the same. The link below takes you to video taken inside the building as the tornado came through by a teacher using her cell phone.

http://www.huffingtonpost.com/2013/05/23/tornado-video-inside-school_n_3328255.html

And another taken by a bystander

<http://newsok.com/ongoing/may-20-tornadoes?page=4>

Briarwood Before and After Satellite Photos:



Fortunately, unlike Plaza Towers, there were no fatalities at Briarwood even though walls fell around students and teachers huddled in hallways and bathrooms.

Center for Technology Building – Same Campus as Administrative Services, Separate Building.
Original address 1504 SE 4th Street, Moore, OK 73160. Originally shared BEN 16038506 with Administrative Services since located on the same site.

- For swing site, combined with West Warehouse BEN 16069503, temporary address 3500 SW 15th Street, Oklahoma City, OK. Address located at Dell who is hosting dmarc during rebuild.



In addition to the two elementary schools the Center for Technology building was also destroyed. This center housed all the servers that manage the wide area network for the district, and stored all data for the district. The tornado occurred just a few days before report cards were due and all servers lay under huge blocks of concrete which meant that heroic efforts were required to remove the debris covering the servers then moving them to a safe place so that the information contained on the servers could be

restored and records could be accessed through a new demarc located in a secure location. Along with vendors from HP, Cisco, and EMC, Dell Computer staff from the local Dell Call Center assisted in the recovery of the servers. Servers were temporarily housed at the Dell facilities until the servers could be moved back to MPS the week of June 16, 2014.

Technology Building: Before and after



The following is a link to a video where the crane operator has removed the top cover debris of the technology building and is helping Moore technology staff upright the server racks for them to access. <http://bit.ly/1p5PvW4>



Moore PS Technology Services, BEN 16069503 - Temporary facility – head end of the school district network, servers housed at Dell Center, 3500 SW 15th Street, Oklahoma City, OK



Administrative Building BEN 16038506 – Same Campus as Center for Technology, Separate Building. Original address 1500 SE 4th Street, Moore, OK 73160.

- *Changed name and address to Swing site – Administrative Services & Technology Center, temporarily housed at 1901 N. Moore, Moore, OK 7316 (Greentree Plaza)*

- For Erate FY2014, established new entity # 16077414 for Moore Administrative Services Bldg, 1500 SE 4th Street, Moore, OK 73160 to be rebuilt on original site.



The Administrative Services Center “ASC” building sustained significant damage. ASC was gutted leaving the foundation and support beams and then reconstructed. Personnel moved back into the building starting September 25, 2014. It is fully occupied at this time.

Temporary facilities for Administrative Services and Technology personnel. 1901 North Moore Avenue, “Green Tree Plaza”:



SCHOOL BOARD ACTIONS:

On May 21st, 2013, the Moore Board of Education met in a called emergency meeting and the following motion was filed and approved:

Motion was made by Dr. Leemaster and seconded by Mrs. Shuey to declare an emergency and approve a Declaration of Emergency and Resolution to authorize the Superintendent of Schools to

take action necessary to repair and/or replace certain Moore Public Schools' buildings, property, and equipment that have sustained damage and/or destruction caused by a violent tornado on May 20, 2013.

Vote as follows:

Shuey Yes

Allen Yes

Leemaster Yes

Painter Absent

Wright Yes

Motion carried 4-0. (See attachment for Declaration of Emergency and Resolution)

DECLARATION OF EMERGENCY AND RESOLUTION

At a duly called meeting of the Board of Education of Independent School District No. 2 of Cleveland County ("District") held at 8:45 a.m. on the 21st day of May, 2013, the following Resolution was introduced and adopted by the approval of two-thirds (2/3) of the members of the Board of Education.

WHEREAS, on May 20, 2013, a tornado damaged Briarwood Elementary School, Plaza Towers Elementary School, Highland East Jr. High, the District Technology Center, and the Administrative Service Center for the school district.

NOW THEREFORE BE IT RESOLVED by the District's Board of Education:

1. That an emergency exists;
2. That it is necessary to undertake replacement of Briarwood Elementary School located at 14901 S. Hudson in Oklahoma City, Oklahoma;
3. That it is necessary to undertake replacement of Plaza Towers Elementary School located at 852 S.W. 11th in Moore, Oklahoma;
4. That it is necessary to undertake major repairs/replacement of Highland East Jr. High located at 1200 S.E. 4th Street in Moore, Oklahoma;
5. That it is necessary to undertake major repairs/replacement of the Moore Public Schools Administrative Service Center located at 1500 S.E. 4th Street in Moore, Oklahoma;
6. That it is necessary to undertake replacement of the district technology center located at 1500 S.E. 4th Street in Moore, Oklahoma;
7. That the Superintendent is hereby authorized to contract for the necessary repairs/replacement to the schools and district facilities as listed in #2-#6 above; and
8. That the Public Competitive Bidding Act shall not apply to those repairs/replacement which are necessitated by this emergency.

By making this resolution, the State of Oklahoma recognizes that the need for quick action to replace lost school buildings the district is no longer required to follow the normal bidding process. Consequently, this should make it possible for the district to be exempt from the normal bidding process in this particular situation.

REQUESTS:

It has taken the district from the date of the tornado destruction through October, 2014 to work through the devastation, repair, and reconstruct the buildings for the provision of educational services across the district.

The waivers needed are to approve the locations of district staff and students at temporary locations during the rebuilding process. All funding requests were filed and approved at the district level, so all sites on the FCC Form 471, Block 4, for Moore Public School's Form 471 Applications #829059 (FY2012) and #894589 (FY2013) were included on the funding requests. Even though students and school personnel were moved and services changed, the service providers remained the same and the entity numbers remained the same. Address and name changes were submitted on entities to reflect the temporary address locations as detailed above.

Below we have detailed each action so that the Commission will have on record the changes made at the district in use of the E-rate funds to meet the needs of the students and staff of the district to deliver essential services for the delivery of the Internet and telecommunications services to the classrooms of the district to meet the educational needs of the Moore Public School's students.

1. WAIVER REQUEST – USE OF FUNDED SERVICES AT ALL DISTRICT LOCATIONS INCLUDING TEMPORARY SWING SITES.

Plaza Towers Elementary School BEN 83897:

Students will attend classes at the old Central Junior High School building which is now called Plaza 800 on the same campus with the existing Central Junior High School BEN83899 , 400 North Broadway, Moore.

The "Plaza 800" building was previously gutted and remodeled. Consequently the building required the establishment of telecommunications services including telephone, long distance, Internet Access, and high bandwidth circuits.



Briarwood Elementary School BEN 83922

Briarwood Elementary students attended classes at Emmaus Baptist Church, 16001 South Western, OKC when school began in August 2013. This facility had not been used as a school in the past and required the establishment of telecommunications services including telephone, long distance, Internet Access, and high bandwidth circuits.



Moore PS Technology Services BEN 16069503

Until a new Technology Building could be built, the Demarc for the district and the servers that control network and Internet access were housed temporarily by Dell at 3500 SW 15th Street, Oklahoma City, OK 73108.

Fortunately for Moore, Dell Computer has a facility in Oklahoma City and helped in the relocation efforts and in the restoration of access to critical data stored on the servers. During the recovery process, they agreed to allow Moore to leave the servers on-site for an indefinite period of time.



This was a perfect solution for the location of these servers due to the fact that Dell employs a large number of service technicians and managers at this site that are already serving the public-sector and corporate accounts Dell has in the immediate area by resolving technical issues and responding to technical questions regarding servers and storage. Their expertise was critical in the recovery and relocation of Moore's equipment to a secure facility that could serve as the Head End of the Moore Public Schools wide area network as well.

At present, the district does not have any building that could serve the purpose of housing the servers and it will be 1-2 years before one will be available. Therefore, the district prefers to leave the servers in place at Dell for an indefinite period while they build a new building to house the servers.

Moore Public Schools staff members initially managed the servers remotely from their temporary location at the Greentree Plaza, 1901 N. Moore Ave, Moore OK where the technology staff members were housed until the Technology building could be completed. On April 21, 2014, the technology personnel moved back to the rebuilt technology center building at 1504 SE 4th Street, Moore, OK 73160.



Administrative Building BEN 16038506

Administrative Services moved to temporary facilities at the Greentree Plaza located at 1901 N. Moore Ave., Moore, OK 73160. The building required the establishment of telecommunications services including telephone, long distance, Internet Access, and high bandwidth circuits.

On September 2nd, 2014, Moore Public Schools’ administrative personnel were able to move back to the rebuilt Administrative Services Center “ASC” located at the original site, 1500 SE 4th Street, Moore, OK.

ACCREDITATION OF SITES BY STATE OF OKLAHOMA

The Executive Director of the Oklahoma State Department of Education Accreditation Standards, Art Schofield, stated the following in his email that is attached to this request:

“The following schools will be state accredited for the school term 2013-2014:

Moore School District:

Briarwood Elementary, and Plaza Towers Elementary - These two schools were destroyed in the tornado and will be in temporary sites but will be fully accredited.

Highland East Junior High was damaged but will be operational for the beginning of school term and also be accredited.”

RELOCATION OF TELECOMMUNICATIONS SERVICES: Following each location is a snapshot of the services requested on Application # 894589 for FY 2013-2014. The same service provider, Cox Telecom is continuing to provide services to the district under their existing contracts. No additional funding is requested.

The following grid shows the requests for services made on the FY 2013-2014 application.

FRN	SPIN	SP	SERVICE	FCDL DATE	Pre-Disc Amt	Disc. %	Request
2439658	143005575	Cox Oklahoma Telcom, LLC	Telephone	9/11/2013	\$1,059,424.92	61%	\$646,249.20
2439662*	143025240	AT&T Mobility	Cellular Svcs	9/11/2013	\$48,694.08	61%	\$29,703.39

FRN	SPIN	SP	SERVICE	FCDL DATE	Pre-Disc Amt	Disc.%	Request
2439685*	143000677	Verizon Wireless	Cellular Svcs	9/11/2013	\$59,866.68	61%	\$36,518.67
2439696*	143019484	Page Plus, Inc.	Paging	9/11/2013	\$2,339.40	61%	\$1,427.03
2441287	143005575	Cox Oklahoma Telcom, LLC	Internet Access	9/11/2013	\$106,524.00	61%	\$64,979.64
2441438	143005575	Cox Oklahoma Telcom, LLC	Telephone	9/11/2013	\$937.08	61%	\$571.62
					\$1,277,786.16		\$779,449.55

*FRN's 2439662, 2439685, and 2439696 are not impacted in any way by the tornado so no special requests are made for these three cellular based services.

Plaza Towers Elementary School BEN 83897 Moved to Plaza 800 Building on Central Junior High Campus, 400 N. Broadway, Moore, OK (Buildings on this campus are undergoing repairs to the roofs and air conditioning systems, and some flooding repairs are also in process.)

Acct#	BEN	Site	Address	Service	Qty	Monthly \$
028469601	83897	Plaza Towers	852 SW 11th	TLS 1000 Mbps Intrastate	1	2400.00
058736501	83897	Plaza Towers ES	400 N. Broadway	Cox Basic Centrex	3	45.77

-The 1GB Metro E (MRC of \$2,400) circuits at Plaza Towers were zero rated effective 5/21/13 and disconnected as of 5/30/13. Since this site is adjacent to Central Junior High, Plaza 800 will utilize the Central Junior High School 1GB Connections so no new services will be required. However, the district has used all funding for the 2013-14 funding year and does not wish to request reduction of funding. The district is requesting a waiver to allow the funds to be used at the other swing sites until the original buildings have been reconstructed.

- The 3 phone lines (MRC of \$45.77) at Plaza Towers have been moved to this location.

E-rate Commitment and Request:

Priority 1: An address change was filed for this site so that invoices submitted by Cox Telecom SPIN 143005575 will be paid.

Priority 2:

No priority 2 funds were requested for this school as their discount rate of 66% has been under the funding floor in recent years.

Briarwood Elementary School BEN 83922 Moved to Emmaus Baptist Church – 16001 S. Western,

This site was specifically stated as serving as a school and is fully accredited as per Mr. Schofield's email attached.

Acct#	BEN	Site	Address	Service	Qty	Monthly \$
028469601	83922	Briarwood ES	16001 S. Western	TLS 1000 Mbps Intrastate	1	2400.00
Construction						NEW COST TO BUILDING OUT CIRCUIT
						\$5464.33
058736301	83922	Briarwood ES	16001 S. Western	Cox Basic Centrex	3	46.03

-The 1GB Metro E (MRC of \$2,400) circuit at Briarwood was relocated to this location.

Construction cost was paid from non-Erate funds.

-The 3 phone lines (MRC of \$46.03) at Briarwood were relocated to the Emmaus Baptist Church facility. No new services are needed

E-rate Commitment and Request:

Priority 1:

An address change was submitted to USAC and approved for this site so that invoices submitted by Cox Telecom SPIN 143005575 will be paid.

This site did not have a 1g circuit installed previously so to bring this school online with the 1g circuit for Internet Access in all classrooms require an additional cost of \$5,464.33 to build out the network to the church building.

Priority 2:

No priority 2 funds were requested for this school as their discount rate of 66% has been under the funding floor in recent years.

Highland East Junior High School BEN 83907 – 1200 SE 4th, Moore, OK: Repairs were completed for this building in order to be ready for classes to begin in August 2013. A new circuit was necessary for this site as previously they shared the circuit at the Tech Center which was destroyed by the tornado.

Acct#	BEN	Site	Address	Service	Qty	Monthly \$
058892401	83907	Highland East JHS	1200 SE 4th	Cox Basic Centrex	4	61.44
058892501	83907	Highland East JHS	1200 SE 4th	Cox Basic Centrex	1	14.60
058892601	83907	Highland East JHS	1200 SE 4th	Cox Basic Centrex	1	14.60
NEW						
028469601	83907	Highland East JHS	1200 SE 4th	TLS 1000 Mbps Intrastate	1	2400.00
Construction Cost						\$7,423.03

The current basic services have been relocated and the new circuit has been installed.

Priority 1:

Funding requested on the FY 2013 application will be required. This site did not have a 1g circuit installed so to bring this school online with the required 1g circuit for Internet Access in all classrooms required an additional \$7,423.03 paid with non-Erate funds to build out the network to the church building.

Center for Technology Building BEN 16038506 Servers Moved to Dell Computer - 3500 SW 15th St., Oklahoma City, OK 73108.

New BEN: 16069503, Moore PS Technology Servcies, 3500 SW 15th

Acct#	BEN	Site	Address	Service	Qty	Monthly \$
28469601	16069503 (new)	Center for Technology (Dell)	3501 SW 15 th , OKC	Cox Optical Internet	1	8877.00
28469601		Center for Technology (Dell)	3501 SW 15 th , OKC	10 Gig TLAN Tech Center	1	7500.00
28469601		Center for Technology (Dell)	3501 SW 15 th , OKC	DID 100 Number Block	50	200.00
28469601	16038506 (original)	Center for Technology (Dell)	3501 SW 15 th , OKC	Cox Connect PRI Facility	2	698.00
28469601		Center for Technology (Dell)	3501 SW 15 th , OKC	Access Recovery Fee Bulk Facility	2	20.00

Acct#	BEN	Site	Address	Service	Qty	Monthly \$
28469601		Center for Technology (Dell)	3501 SW 15 th , OKC	FCC Access Charge Bulk Facility	2	59.40
28469601		Center for Technology (Dell)	3501 SW 15 th , OKC	Usage Charges		90.26
28469601		Center for Technology (Dell)	3501 SW 15 th , OKC	Taxes, Fees & Surcharges		3316.60

The PRI services were moved from the Tech Center to the Dell location on 5/24/13. There was no construction cost associated with the move from the Tech Center to Dell. Also, Dell is not charging the district for the co-location of the servers. The circuits connected to the servers are billed to Moore Public Schools.

We are requesting that all circuit fees be paid with E-rate funds requested on Application # 894589 for FY 2013.

Rationale for Leaving the Servers at Dell:

Major considerations in the placement of the central servers for a school district are that the room(s) have a clean environment with adequate cooling and humidity control, backup electrical power, firewall and network filtering equipment, appropriate electrical capacity, a high level of security and the availability of high bandwidth circuits at the building. As a large computer company, Dell had excess space within their facility that met all the needs stated above including the high bandwidth circuit capacity to the building.

Recreating what the district had in the Technology Center will take an extended period of time during which time the computer support necessary for a school district with 23,000+ students and 1,250 staff members to continue to have access to all the resources they depend on to provide quality education for all students continues.

Therefore, the district believes it is in the best interest of the district to continue to house the servers at Dell until such time as the Center for Technology or other facility is available to provide the same environment somewhere within the school district.

Dell is not a service provider on the E-rate applications for Moore Public Schools. In this case, the offer of assistance to the district in this disaster is in no way related to any competitive bidding for E-rate services or equipment which should eliminate any potential findings that the acceptance of these services violated the gift rules which is clarified on Page 41 of FCC 10-175 Item 90:

“The rule we articulate today does not discourage companies from making charitable donations to E-rate eligible entities in the support of schools – including, for example, literacy programs, scholarships, and capital improvements – as long as such contributions are not directly or indirectly related to E-rate procurement activities or decisions.²⁶⁶ If contributions have no relationship to the procurement of E-rate eligible services and are not given by service providers to circumvent our rules, including rules that require schools and libraries to pay their own non-discount share for the services they are purchasing, such contributions will not violate the prohibition against giftgiving.²⁶⁷”

Priority 1:

Funding requested on the FY 2013-2014 application will be required. No separate costs were incurred for this connection.

Priority 2: None

Center for Technology Building BEN 16038506, and the Administrative Building BEN 16038506 –

These buildings were destroyed (Center for Technology) or heavily damaged (Administration Building) and services for both were temporarily moved to Greentree Plaza, 1901 N. Moore.

Acct#	BEN	Site	Address	Service	Qty	Monthly \$
58932001	16038506	Technology - Admin Bldg	1901 N. Moore	Cox Connect Service Flat	8	288.52
58744001	16038506	Technology Bldg	1901 N. Moore	Cox Basic Centrex	12	245.57
28469601	16038506	Moore Public Schools	1901 N. Moore	TLS 1000 Mbps Intrastate	1	2400.00
28469601	16038506	Moore Public Schools	1901 N. Moore	Construction	1	4930.25

This site meets the Non-Instructional Facility definition:

1. Is the non-instructional facility used solely for school, school district or library business?
 Yes No
2. Do only school district or library employees use the non-instructional facility? Yes No
3. Are there any classrooms in the non-instructional facility? Yes No

The new services detailed above are needed to enable both administration and technology staff members to manage the district as a whole from this location.

2. WAIVER REQUEST – USE OF E-RATE FUNDED SERVICES DURING SCHOOL HOURS BY OUTSIDE AGENCIES

FEMA and the American Red Cross While Summer Classes are in Session

FEMA and the American Red Cross requested the use of classrooms at the Moore High School as location for them to operate out of during the time that Red Cross representatives were delivering services, and FEMA was conducting their evaluations of the extent of damage resulting from the May 20th tornado and conducting the activities necessary to determine needs and actions that need to be taken to mitigate the impact of such widespread damage in the area impacted by the May 20th tornado.

While the use of a school facility and use of the Internet Access by entities other than the school itself is clearly defined as ineligible under sections 54.503 and 54.504 of FCC rules regardless of whether students were present or not, in the Sixth Report and Order the FCC revised their rules

to” permanently allow schools to open their facilities, when classes are not in session, to the general public to utilize services and facilities supported by E-rate.

Due to the bandwidth available at the site of 1 Gbps and the small number of students attending summer school during June 2013 and July 2013 as compared to the 2,200 students attending during the normal school year, the district was able to provide their students with full access to all online resources with no negative impact from the American Red Cross and FEMA online activity. Therefore, the district approved the use of the facility.

We are requesting a formal approval from the FCC of this action on the part of the district for our records should this issue come up at any time in the future as a result of any subsequent audit.

3. WAIVER REQUEST – DELIVERY OF SERVICES TO NIF AND INELIGIBLE DELL FACILITY

Within this waiver request, there are two facilities that do not meet the definition of a school:

- Greentree Plaza, 1901 N. Moore, Moore, OK 73160. Greentree Plaza meets the Non-instructional Facility definition as the building is leased by the district and is only used by school staff.
- Dell Computer Offices, 3500 SW 15th Street, Oklahoma City, OK 73160. The Dell facility does not meet the NIF designation nor is it a school. However, this location has been identified as the best location for housing the district servers as stated above.

Summary:

As stated in the introduction:

The focus of this request for waiver is to provide the information necessary for the Federal Communications Commission to be able to approve:

(1) use of approved E-rate funding for Priority One services at all of the sites in the district including the temporary swing sites and temporary non-instructional facilities requested on FY2012 FCC Form 471 application # 829059 and FY2013 FCC Form 471 application # 894589

(2) special exception of the eligible entity rules to allow Dell Computer to continue to house the Moore Public Schools servers and serve as the head end of the Moore Public Schools network until other options can be identified and

(3) approve the use of classrooms in the Moore High School by FEMA and the American Red Cross while they provide disaster relief assistance.

Respectfully submitted:



Jane Kellogg, Consultant

Attachments:

- A: Oklahoma State Department Accreditation Approval
- B. Board of Education Meeting Minutes
- C. List of funding requests – Form 471 # 829059 and 894589
- D. Moore Public Schools Network Changes due to May 2013 Tornado
 - News article on site changes
 - Dell Letter
 - Scope of Work detail
- E. Network Diagrams
 - 2011 prior to tornado
 - 2013 after move servers and network head end to Dell facilities
 - 2013 after technology dept. moved back to original location
 - 2014 after 2 new school sites completed