

November 18, 2014

Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

Dear Federal Communications Commission:

Please find the enclosed Letter of Appeal and Petition for Waiver on behalf of Fanshawe School District, Fanshawe, Oklahoma for denial of the applicant's request for an Invoice Deadline Extension.

Respectfully submitted,


Deborah Sovereign, Consultant

Enclosures

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

In the Matter of)
)
Letter of Appeal – Petition for Waiver)
Invoice Deadline Extension Request)
Fanshawe School District 39) CC Docket No. 02-6
Fanshawe, Oklahoma)
)
FCC Forms 471 # 813298, 768010,)
684724 and 610561)
)
)

LETTER OF APPEAL
PETITION FOR WAIVER

FANSHAWE SCHOOL DISTRICT 39
FANSHAWE, OKLAHOMA

November 18, 2014

Deborah Sovereign
Jane Kellogg

Kellogg & Sovereign Consulting, LLC
1101 Stadium Drive
Ada, OK 74820
(580) 332-1444
(580) 332-2532 (facsimile)
Email: dsovereign@kelloggllc.com

Fanshawe School District 39, Fanshawe, Oklahoma, is appealing the denial of invoice deadline extension requests and is requesting a waiver of the time requirement of filing the invoice deadline extension requests for the funding requests listed below.

The reason for denial:

“Current guidelines and procedures require Invoice Deadline Extension requests to be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring and extension (120 days after the service delivery date). The extension request was not filed in a timely manner, so it is denied.”

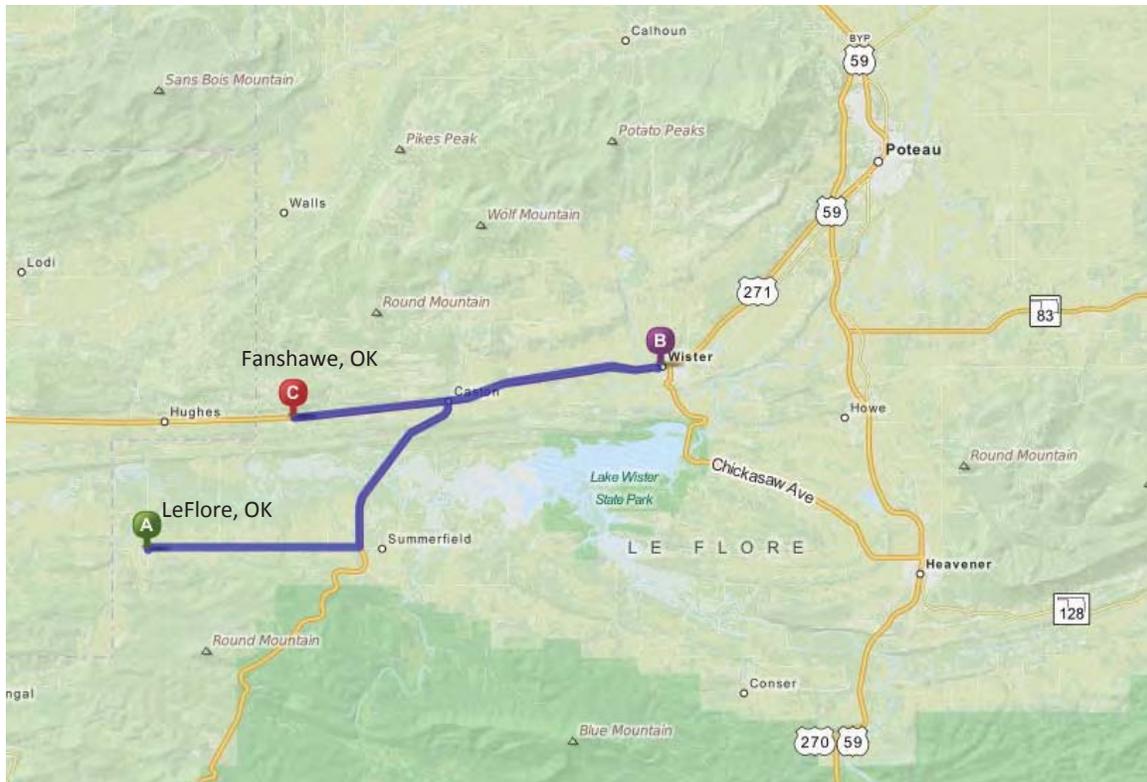
Billed Entity		Fanshawe School District 39			
Billed Entity Number		140395			
471 Application Number	FRN	SPIN	Service Provider Name	Funding Year	Committed Amount
813298	2211182	143002392	Oklahoma Western Telephone Company	2011	2,880.00
813298	2211227	143001192	AT&T Corp.	2011	2,880.00
768010	2076840	143001192	AT&T Corp.	2010	1,440.00
768010	2076864	143002392	Oklahoma Western Telephone Company	2010	2,699.62
684724	1872586	143001192	AT&T Corp	2009	1,350.00
684724	1872623	143000677	Verizon Wireless	2009	1,350.00
684724	1872603	143002392	Oklahoma Western Telephone Company	2009	3,240.00
610561	1681472	143008900	AllTel Communications	2008	1,093.72
610561	1681455	143002392	Oklahoma Western Telephone Company	2008	3,171.10
610561	1681435	143001192	AT&T Corporation	2008	1,190.16
					21,294.60

As stated in the original invoice deadline extension request, the applicant’s consultant did not file the forms necessary with the service providers in order to complete the request for E-rate discounts on the bills. We included a listing of the applicant’s funding to date which shows that the Forms 486 were successfully filed for each funding year and some of the funding requests were properly discounted by the service providers in FY 2008, 2008, 2010 and 2011. However, the services funded with any provider that required additional steps to receive discounts were not completed. For example, Oklahoma Western Telephone Company is a small rural carrier. Even though the

discount choice is the applicant's, since the service provider does not work with E-rate filings on a normal basis, the schools in their service area usually use the BEAR method. AT&T and Verizon both require that the applicant submit a form to the service provider to request that discounts be applied to the bill (SPI method).

Since the applicant school thought that the consultant was processing the necessary paperwork with the service providers, the applicant was not aware there was a problem until the new principal who had taken over in July, 2013 was working on reimbursements for the 2013-14 funding year and the 2014-15 E-rate filings. The deadline for filing invoices for 2013-14 was October 28, 2014 so Mr. McGowen didn't realize there was a problem until he was working on the 2013-14 reimbursement requests and the 2014-15 E-rate filings. Mr. McGowen realized there was a problem with their prior year E-rate filings and confirmed that the district had incurred the charges but did not receive reimbursement or discounts on their bills.

This same situation occurred with two neighboring school districts, Leflore Indep School Dist 16 and Wister Indep School Dist 49 who had used the same consultant. Both Leflore and Wister applied for and received approval on invoice deadline extension requests. Leflore and Wister have subsequently submitted properly completed reimbursement requests and received the funding associated with the charges incurred during the years that the invoices had not been timely filed.



Fanshawe is a rural school district in Oklahoma. The town has a total population of 384. The school has a limited administrative staff and is in financial need of the funding support from these requests. The principal, Mr. McGowen by himself “dug through” the school’s billing files to locate all of the invoices associated with the funding requests listed above and has confirmed that they incurred and paid for the charges. The funding total is only \$21,294.60 but is very significant to this small, rural school.

We are respectfully requesting a waiver of the deadline for filing the invoice deadline extension requests for the funding requests listed and request consideration of the invoice deadline requests as originally submitted to USAC on August 21, 2014.

Respectfully Submitted,

Deborah J. Sovereign, Consultant

ATTACHMENTS

1. Denials – Administrator’s Decision on Invoice Deadline Extension Request
Funding Requests for Erate Funding Years 2008, 2009, 2010 and 2011
2. Invoice Deadline Extension Request submitted August 21, 2014
3. Funding to date report to show some funding was disbursed and Forms 486
timely filed
4. Wister Indep School Dist 49 - Approval of invoice deadline Request and copy of
original request
5. Leflore Indep School Dist 16 – Approval of invoice deadline request and copy of
original request
6. Letter of Agency

ATTACHMENT 1

Denials Administrator's Decision on Invoice Deadline Extension Request

Letter of Appeal - Petition for Waiver: Invoicing Deadline Extension Request
Fanshawe School District 39, Fanshawe, Oklahoma
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444

Administrator's Decision on Invoice Deadline Extension Request

September 19th, 2014

Debi Sovereign
Kellog & Sovereign Consulting, LLC
1101 Stadium Drive
Ada, OK 74820

RE: Fanshawe School District 39

FCC Form 471 Application Number: 610561
Funding Request Number(s): 1681435, 1681472, 1681455
Your Correspondence Dated: August 21st, 2014

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the FRN(s) indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one FRN, please note that for each FRN for which an invoice deadline extension request was submitted, a separate letter may be sent.

Decision on Request: **Denied**

Explanation: Current guidelines and procedures require Invoice Deadline Extension requests to be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension (120 days after the end of the service delivery date). The extension request was not filed in a timely manner, so it is denied.

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
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 - Funding Request Number(s) (FRNs) you are appealing if provided in the letter
 - **<insert name of the letter and funding year - both are located at the top of the letter>** 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.
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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 us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us 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.

Schools and Libraries Division
Universal Service Administrative Company

cc: Linda A Doyle, AT&T Corp.
Viola Baboola, Alltel Communications
Pauline Van Horn, Oklahoma Western Telephone Company

Administrator's Decision on Invoice Deadline Extension Request

September 19th, 2014

Debi Sovereign
Kellog & Sovereign Consulting, LLC
1101 Stadium Drive
Ada, OK 74820

RE: FANSHAWE SCHOOL DISTRICT 39

FCC Form 471 Application Number: 684724
Funding Request Number(s): 1872603, 1872586, 1872623

Your Correspondence Dated: August 21st, 2014

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the FRN(s) indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one FRN, please note that for each FRN for which an invoice deadline extension request was submitted, a separate letter may be sent.

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Schools and Libraries Division
Universal Service Administrative Company

cc: Pauline Van Horn, Oklahoma Western Telephone Company
Linda A Doyle, AT&T Corp.
Diane Reese, Verizon Wireless (Cellco Partnership)

Administrator's Decision on Invoice Deadline Extension Request

September 19th, 2014

Debi Sovereign
Kellog & Sovereign Consulting, LLC
1101 Stadium Drive
Ada, OK 74820

RE: FANSHAWE SCHOOL DISTRICT 39

FCC Form 471 Application Number: 768010
Funding Request Number(s): 2076840, 2076864
Your Correspondence Dated: August 21st, 2014

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the FRN(s) indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one FRN, please note that for each FRN for which an invoice deadline extension request was submitted, a separate letter may be sent.

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Schools and Libraries Division
Universal Service Administrative Company

cc: Linda A Doyle, AT&T Corp.
Pauline Van Horn, Oklahoma Western Telephone Company

Administrator's Decision on Invoice Deadline Extension Request

September 19th, 2014

Debi Sovereign
Kellog & Sovereign Consulting, LLC
1101 Stadium Drive
Ada, OK 74820

RE: FANSHAWE SCHOOL DISTRICT 39

FCC Form 471 Application Number: 813298
Funding Request Number(s): 22111182, 2211227

Your Correspondence Dated: August 21st, 2014

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the FRN(s) indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one FRN, please note that for each FRN for which an invoice deadline extension request was submitted, a separate letter may be sent.

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Schools and Libraries Division
Universal Service Administrative Company

cc: Pauline Van Horn, Oklahoma Western Telephone Company
Linda A Doyle, AT&T Corp

ATTACHMENT 2

Invoicing Deadline Extension Request Submitted August 21, 2014

Letter of Appeal - Petition for Waiver: Invoicing Deadline Extension Request
Fanshawe School District 39, Fanshawe, Oklahoma
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444



1101 Stadium Drive • Ada, OK 74820 • p 580.332.1444 • f 580.332.2532 • dsovereign@kelloggllc.com

August 21, 2014

Invoice Deadline Extension Request
 Schools and Libraries Division – Correspondence Unit
 100 S. Jefferson Road
 P.O. Box 902
 Whippany, NJ 07981
 (973) 599-6526

INVOICING DEADLINE EXTENSION REQUEST

Contact Name:

Debi Sovereign, Consultant
 1101 Stadium Drive
 Ada, OK 74820
 Phone: 580.332.1444, Fax: 580.332.2532
 Email: dsovereign@kelloggllc.com

APPLICANT: Fanshawe School District 39 (BEN: 140395)

471 Application Number	FRN	SPIN	Service Provider Name	Funding Year	Committed Amount
813298	2211182	143002392	Oklahoma Western Telephone Company	2011	2,880.00
813298	2211227	143001192	AT&T Corp.	2011	2,880.00
768010	2076840	143001192	AT&T Corp.	2010	1,440.00
768010	2076864	143002392	Oklahoma Western Telephone Company	2010	2,699.62
684724	1872586	143001192	AT&T Corp	2009	1,350.00
684724	1872623	143000677	Verizon Wireless	2009	1,350.00
684724	1872603	143002392	Oklahoma Western Telephone Company	2009	3,240.00
610561	1681472	143008900	AllTel Communications	2008	1,093.72
610561	1681455	143002392	Oklahoma Western Telephone Company	2008	3,171.10
610561	1681435	143001192	AT&T Corporation	2008	1,190.16
					21,294.60

Reason for Invoice Deadline Extension Request:

Documentation requirements that necessitate third-party contact or certification and circumstances beyond the service provider's control.

Discussion:

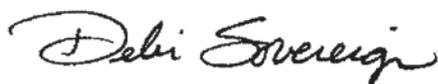
Beginning in the spring of 2008, the district outsourced their E-rate filings to a consultant who had worked as a technology director for a neighboring school district. The consultant properly filed the applicant's Forms 470, 471 and 486, but the consultant did not follow up with the applicant regarding filing for reimbursements.

Wes McGowen took over as principal in July 2013. When the new principal was preparing to file their E-rate applications for 2014-15 he discovered during the review of prior years that the funding above had not been disbursed. The principal confirmed with a fellow employee that the school district had incurred the charges and that the E-rate funding for the charges incurred should have been disbursed to the district. The services that were discounted by the provider (SPI) method were properly received by the district but the services that required the BEAR method were not. The funding amounts are significant to this rural school district and they are very concerned about how to meet their payments this year without the funding that should have been disbursed.

Upon review of the applicant's funding history, it is evident that the consultant was able to successfully coordinate with service providers in funding years 2008-2011 to request the SPI method, but no reimbursement Forms 472 were filed for services that the district paid in full.

The applicant, therefore, is requesting an invoice deadline extension for the funding requests listed above. The extension will allow the applicant additional time to properly submit Forms 472 for the services that were received during the funding year and paid in full by the applicant.

Respectfully submitted,



Debi Sovereign
Consultant

Attachment:

- A. Letter of Agency

ATTACHMENT 3

Funding to Date Report Shows funding disbursed for some FRNs and Forms 486 filed

Letter of Appeal - Petition for Waiver: Invoicing Deadline Extension Request
Fanshawe School District 39, Fanshawe, Oklahoma
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444



Universal Service Management Professionals

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- Resources & Archives
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Tuesday, November 18, 2014

Funding Data Search: SPIN BEN 471 FRN CRN State: [ESPF Home](#)

1998 | 1999 | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | All Years

» Utilization Summary Chart

[Print Version]

E-Rate Organizer Funding Search for All Funding Years

Applicant: FANSHAWE SCHOOL DISTRICT 39
Billed 140395 Type: DISTRICT
Entity Number:
Address: HIGHWAY 270, FANSHAWE, OK 74935

Funding Year 2014

<u>471</u>	<u>FRN</u>	<u>SPIN</u>	<u>Service Provider</u>	<u>Service*</u>	<u>Original Requested Amt</u>	<u>Funded</u>	<u>Disbursed</u>	<u>Util. %</u>	<u>Discount</u>	<u>486 Invoice Filed</u>	<u>Mode</u>
988305	2696437	143002392	Oklahoma Western Telephone Company	T	\$3,840.00	\$3,840.00	\$0.00	0%	80%	Y	NOT SET
988305	2696468	143001192	AT&T Corp.	T	\$3,840.00	\$3,840.00	\$0.00	0%	80%	Y	NOT SET
988305	2696513	143015254	OneNet (Oklahoma State Regents)	IA	\$14,179.20	\$14,179.20	\$0.00	0%	80%	Y	NOT SET
					\$21,859.20	\$21,859.20	\$0.00	0%			

Funding Year 2013

<u>471</u>	<u>FRN</u>	<u>SPIN</u>	<u>Service Provider</u>	<u>Service*</u>	<u>Original Requested Amt</u>	<u>Funded</u>	<u>Disbursed</u>	<u>Util. %</u>	<u>Discount</u>	<u>486 Invoice Filed</u>	<u>Mode</u>
923688	2521260	143002392	Oklahoma Western Telephone Company	T	\$3,456.00	\$3,456.00	\$1,289.53	37%	80%	Y	BEAR
923688	2521261	143001192	AT&T Corp.	T	\$3,840.00	\$3,840.00	\$913.82	24%	80%	Y	BEAR
923688	2521265	143015254	OneNet (Oklahoma State Regents)	IA	\$9,868.80	\$9,868.80	\$4,934.40	50%	80%	Y	SPI
923700	2521419	143008322	Hall Computer Systems, Inc.	IC	\$29,231.84	\$0.00	NF	0%	80%	N	NOT SET
923736	2521400	143008322	Hall Computer Systems, Inc.	ICM	\$9,630.34	\$0.00	NF	0%	80%	N	NOT SET
					\$56,026.98	\$17,164.80	\$7,137.75	41.6%			

Funding Year 2012

<u>471</u>	<u>FRN</u>	<u>SPIN</u>	<u>Service Provider</u>	<u>Service*</u>	<u>Original Requested Amt</u>	<u>Funded</u>	<u>Disbursed</u>	<u>Util. %</u>	<u>Discount</u>	<u>486 Invoice Filed</u>	<u>Mode</u>
868311	2366754	143002392	Oklahoma Western Telephone Company	T	\$2,880.00	\$2,880.00	\$2,405.82	84%	80%	Y	BEAR
868311	2366777	143001192	AT&T Corp.	T	\$2,880.00	\$2,880.00	\$2,273.49	79%	80%	Y	BEAR

868311	2366807	143015254	OneNet (Oklahoma State Regents)	IA	\$9,868.80	\$9,868.80	\$4,934.40	50%	80%	Y	SPI
868434	2367104	143008322	Hall Computer Systems, Inc.	ICM	\$10,579.20	\$0.00 NF	\$0.00	0%	80%	N	NOT SET
					\$26,208.00	\$15,628.80	\$9,613.71	61.5%			

Funding Year 2011

<u>471</u>	<u>FRN</u>	<u>SPIN</u>	<u>Service Provider</u>	<u>Service*</u>	<u>Original Requested Amt</u>	<u>Funded</u>	<u>Disbursed</u>	<u>Util. %</u>	<u>Discount</u>	<u>486 Invoice Filed</u>	<u>Mode</u>
813298	2211182	143002392	Oklahoma Western Telephone Company	T	\$2,880.00	\$2,880.00	\$0.00	0%	80%	Y	NOT SET
813298	2211227	143001192	AT&T Corp.	T	\$2,880.00	\$2,880.00	\$0.00	0%	80%	Y	NOT SET
813298	2211377	143015254	OneNet (Oklahoma State Regents)	IA	\$10,748.80	\$10,748.80	\$4,934.40	46%	80%	Y	SPI
813932	2211629	143008322	Hall Computer Systems, Inc.	ICM	\$10,579.20	\$0.00 NF	\$0.00	0%	80%	N	NOT SET
					\$27,088.00	\$16,508.80	\$4,934.40	29.9%			

Funding Year 2010

<u>471</u>	<u>FRN</u>	<u>SPIN</u>	<u>Service Provider</u>	<u>Service*</u>	<u>Original Requested Amt</u>	<u>Funded</u>	<u>Disbursed</u>	<u>Util. %</u>	<u>Discount</u>	<u>486 Invoice Filed</u>	<u>Mode</u>
768010	2076840	143001192	AT&T Corp.	T	\$1,620.00	\$1,440.00	\$0.00	0%	80%	Y	NOT SET
768010	2076864	143002392	Oklahoma Western Telephone Company	T	\$3,780.00	\$2,699.62	\$0.00	0%	80%	Y	NOT SET
768010	2076889	143008900	AllTel Communications	T	\$1,620.00	\$0.00 NF	\$0.00	0%	80%	N	NOT SET
768010	2076929	143015254	OneNet (Oklahoma State Regents)	IA	\$12,092.40	\$4,934.40	\$4,934.40	100%	80%	Y	SPI
768130	2077176	143008322	Hall Computer Systems, Inc.	ICM	\$9,980.93	\$7,772.83	\$0.00	0%	80%	N	NOT SET
768193	2077374	143008322	Hall Computer Systems, Inc.	IC	\$90,420.48	\$80,373.76	\$0.00	0%	80%	N	NOT SET
					\$119,513.81	\$97,220.61	\$4,934.40	5.1%			

Funding Year 2009

<u>471</u>	<u>FRN</u>	<u>SPIN</u>	<u>Service Provider</u>	<u>Service*</u>	<u>Original Requested Amt</u>	<u>Funded</u>	<u>Disbursed</u>	<u>Util. %</u>	<u>Discount</u>	<u>486 Invoice Filed</u>	<u>Mode</u>
684724	1872586	143001192	AT&T Corp	T	\$1,350.00	\$1,350.00	\$0.00	0%	90%	Y	NOT SET
684724	1872603	143002392	Oklahoma Western Telephone Company	T	\$3,240.00	\$3,240.00	\$0.00	0%	90%	Y	NOT SET
684724	1872623	143000677	Verizon Wireless	T	\$1,350.00	\$1,350.00	\$0.00	0%	90%	Y	NOT SET
684724	1872642	143015254	OneNet (Oklahoma State Regents)	IA	\$5,551.20	\$5,551.20	\$5,551.20	100%	90%	Y	SPI
684817	1872825	143008322	Hall Computer Systems, Inc.	ICM	\$12,862.80	\$5,491.80	\$5,491.80	100%	90%	Y	SPI
					\$24,354.00	\$16,983.00	\$11,043.00	65.0%			

Funding Year 2008

<u>471</u>	<u>FRN</u>	<u>SPIN</u>	<u>Service*</u>	<u>Funded</u>	<u>Disbursed</u>	<u>Discount</u>
------------	------------	-------------	-----------------	---------------	------------------	-----------------

				Service Provider		Original Requested Amt		Util. %		486 Invoice Filed/Mode	
610561	1681435	143001192	AT&T Corporation	T	\$1,190.16	\$1,190.16	\$0.00	0%	90%	Y	NOT SET
610561	1681455	143002392	Oklahoma Western Telephone Company	T	\$3,171.10	\$3,171.10	\$0.00	0%	90%	Y	NOT SET
610561	1681472	143008900	AllTel Communications	T	\$1,093.72	\$1,093.72	\$0.00	0%	90%	Y	NOT SET
610561	1681506	143015254	OneNet (Oklahoma State Regents)	IA	\$5,551.20	\$5,551.20	\$5,551.20	100%	90%	Y	SPI
610561	1681543	143008322	Hall Computer Systems, Inc.	ICM	\$12,105.00	\$11,830.97	\$11,830.97	100%	90%	Y	SPI
					<u>\$23,111.18</u>	<u>\$22,837.15</u>	<u>\$17,382.17</u>	<u>76.1%</u>			

Funding Year 2007

No data found for Entity Number 140395 in funding year 2007

Funding Year 2006

No data found for Entity Number 140395 in funding year 2006

Funding Year 2005

No data found for Entity Number 140395 in funding year 2005

Funding Year 2004

No data found for Entity Number 140395 in funding year 2004

Funding Year 2003

No data found for Entity Number 140395 in funding year 2003

Funding Year 2002

No data found for Entity Number 140395 in funding year 2002

Funding Year 2001

No data found for Entity Number 140395 in funding year 2001

Funding Year 2000

No data found for Entity Number 140395 in funding year 2000

ATTACHMENT 4

Neighboring School – Leflore Indep School Dist 16 Approved Invoicing Deadline Extension Request

Letter of Appeal - Petition for Waiver: Invoicing Deadline Extension Request
Fanshawe School District 39, Fanshawe, Oklahoma
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444



Administrator's Decision on Invoice Deadline Extension Request

April 25, 2014

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

RE: LEFLORE INDEP SCHOOL DIST 16

RE: SLD Invoice #: N/A BEAR or SPI: N/A
Invoice Date: N/A
SLD Line(s) #: N/A
Vendor invoice #: N/A
FCC Form 471 Application Number: 715231
Funding Request Number(s): 1957875, 1957882, 1957893
Your Correspondence Dated: February 02, 2014

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the invoice number indicated above. This letter explains the basis of USAC's decision. If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Invoice Number: N/A Line: N/A
Decision on Request: Approved

Since this Administrator's Decision approved your request, an invoice requesting payment must be submitted, so that it is postmarked no later than 120 days after the date of this letter in order for your request to be considered as timely filed. If you are resubmitting a FCC Form 472, please remember that you should forward the form to the Service Provider as soon as possible to ensure sufficient time to process your request. The invoice should be submitted in accordance with the

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

instructions that are posted in the SLD Forms area of the SLD web site at www.usac.org/sl/ or are available by contacting the SLD Client Service Bureau at 1-888-203-8100.

Thank you for your continued support of and participation in the E-rate program.

Schools and Libraries Division
Universal Service Administrative Company

cc: Pauline Van Horn, Oklahoma Western Telephone Company
Linda Doyle, AT&T Corp.

instructions that are posted in the SLD Forms area of the SLD web site at www.usac.org/sl/ or are available by contacting the SLD Client Service Bureau at 1-888-203-8100.

Thank you for your continued support of and participation in the E-rate program.

Schools and Libraries Division
Universal Service Administrative Company

cc: Pauline Van Horn, Oklahoma Western Telephone Company
Linda Doyle, AT&T Corp.



1101 Stadium Drive • Ada, OK 74820 • p 580.332.1444 • f 580.332.2532 • dsovereign@kelloggllc.com

February 2, 2014

Invoice Deadline Extension Request
 Schools and Libraries Division – Correspondence Unit
 100 S. Jefferson Road
 P.O. Box 902
 Whippany, NJ 07981
 (973) 599-6526

INVOICING DEADLINE EXTENSION REQUEST

Contact Name:

Debi Sovereign, Consultant
 1101 Stadium Drive
 Ada, OK 74820
 Phone: 580.332.1444, Fax: 580.332.2532
 Email: dsovereign@kelloggllc.com

Applicant: LeFlore Indep School Dist 16 (BEN: 140402)

471 Application Number	FRN	SPIN	Service Provider Name	Funding Year	Committed Amount
811583	2204335	143002392	Oklahoma Western Telephone Company	2011	\$4,771.66
811583	2204359	143001192	AT&T Corp	2011	\$2,570.40
715231	1957875	143002392	Oklahoma Western Telephone Company	2010	\$3,324.13
715231	1957882	143001192	AT&T Corp	2010	\$2,549.34
715231	1957893	143001192	AT&T Corp	2010	\$7,777.84

Reason for Invoice Deadline Extension Request:

Documentation requirements that necessitate third-party contact or certification and circumstances beyond the service provider's control.

Discussion:

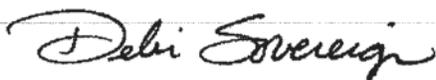
Beginning in the spring of 2011, the district outsourced their E-rate filings to a consultant who had worked as a technology director for a neighboring school district. The consultant properly filed the applicant's Forms 470, 471 and 486, but the consultant did not follow up with the applicant regarding filing for reimbursements.

John Long took over as superintendent in July 2013. When the new superintendent was preparing to file their E-rate applications for 2014-15 he discovered during the review of prior years that the funding above had not been disbursed. The Superintendent's administrative assistant, Daphne Loyd, confirmed that the school district had incurred the charges and that the E-rate funding for the charges incurred should have been disbursed to the district. The funding amounts are significant to this rural school district and they are very concerned about how to meet their payments this year without the funding that should have been disbursed.

Upon review of the applicant's funding history, it is evident that the consultant was able to successfully coordinate with other service providers in funding years 2010 and 2011 to request the SPI method, but no reimbursement Forms 472 were filed for services that the district paid in full.

The applicant, therefore, is requesting an invoice deadline extension for the funding requests listed above. The extension will allow the applicant additional time to properly submit Forms 472 for the services that were received during the funding year and paid in full by the applicant.

Respectfully submitted,



Debi Sovereign
Consultant

Attachment:

- A. Letter of Agency

ATTACHMENT 5

Neighboring School – Wister Indep School Dist 49 Approved Invoicing Deadline Extension Request

Letter of Appeal - Petition for Waiver: Invoicing Deadline Extension Request
Fanshawe School District 39, Fanshawe, Oklahoma
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444



Administrator's Decision on Invoice Deadline Extension Request

May 15, 2014

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

RE: WISTER INDEP SCHOOL DIST 49

RE: SLD Invoice #:	N/A	BEAR or SPI:	N/A
		Invoice Date:	N/A
SLD Line(s) #:	N/A		
Vendor invoice #:	N/A		
FCC Form 471 Application Number:	635976		
Funding Request Number(s):	1759877, 1759941		
Your Correspondence Dated:	February 2, 2014		

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the invoice number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Invoice Number:	N/A	Line:	N/A
Decision on Request:			Approved

Since this Administrator's Decision approved your request, an invoice requesting payment must be submitted, so that it is postmarked no later than 120 days after the date of this letter in order for your request to be considered as timely filed. If you are resubmitting a Form 472, please remember that you should forward the form to the Service Provider as soon as possible to ensure sufficient time to process your request. The invoice should be submitted in accordance with the instructions that are posted in the SLD Forms area of the SLD web site at www.usac.org/sl/ or are available by contacting the SLD Client Service Bureau at 1-888-203-8100.

Thank you for your continued support of and participation in the E-rate program.

Schools and Libraries Division

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl



Administrator's Decision on Invoice Deadline Extension Request

May 15, 2014

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

RE: Wister Indep School Dist 49

RE: SLD Invoice #:	N/A	BEAR or SPI:	N/A
		Invoice Date:	N/A
SLD Line(s) #:	N/A		
Vendor invoice #:	N/A		
FCC Form 471 Application Number:	761101		
Funding Request Number(s):	2056162, 2056186		
Your Correspondence Dated:	February 2, 2014		

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your invoice deadline extension request for the invoice number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Invoice Number:	N/A	Line:	N/A
Decision on Request:		Approved	

Since this Administrator's Decision approved your request, an invoice requesting payment must be submitted, so that it is postmarked no later than 120 days after the date of this letter in order for your request to be considered as timely filed. If you are resubmitting a Form 472, please remember that you should forward the form to the Service Provider as soon as possible to ensure sufficient time to process your request. The invoice should be submitted in accordance with the instructions that are posted in the SLD Forms area of the SLD web site at www.usac.org/sl/ or are available by contacting the SLD Client Service Bureau at 1-888-203-8100.

Thank you for your continued support of and participation in the E-rate program.

Schools and Libraries Division

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

Visit us online at: www.usac.org/sl/



1101 Stadium Drive • Ada, OK 74820 • p 580.332.1444 • f 580.332.2532 • dsovereign@kelloggllc.com

February 2, 2014

Invoice Deadline Extension Request
 Schools and Libraries Division – Correspondence Unit
 100 S. Jefferson Road
 P.O. Box 902
 Whippany, NJ 07981
 (973) 599-6526

INVOICING DEADLINE EXTENSION REQUEST

Contact Name:

Debi Sovereign, Consultant
 1101 Stadium Drive
 Ada, OK 74820
 Phone: 580.332.1444, Fax: 580.332.2532
 Email: dsovereign@kelloggllc.com

APPLICANT: Wister Indep School Dist 49 (BEN: 140440)

471 Application Number	FRN	SPIN	Service Provider Name	Funding Year	Committed Amount
635976	1759877	143004611	SBC/AT&T internet Services	2008	\$4,838.40
635976	1759941	143022137	SBC Advanced Solutions, Inc./AT&T Corp.	2008	56,278.80
757039	2045737	143025240	ATT Mobility	2010	7,830.00
761101	2056162	143004611	SBC/AT&T internet Services	2010	4,860.00
761101	2056186	143022137	SBC Advanced Solutions, Inc./ AT&T Corp.	2010	124,695.60
819006	2228443	143025240	ATT Mobility	2011	4,748.00

Reason for Invoice Deadline Extension Request:

Documentation requirements that necessitate third-party contact or certification and circumstances beyond the service provider's control.

Discussion:

Wister Indep School Dist 49 ("applicant") is requesting invoice extensions for the above referenced funding request numbers from 2008, 2010, and 2011. The applicant had outsourced their E-rate filings for the district to their former technology director. The former technology director ("consultant") was able to properly and timely submit the Forms 470, 471 and 486. However, there were problems recently discovered with missing funding disbursements for the above listed funding requests.

During the summer of 2013, the district was contacted by AT&T collections regarding the charges on their AT&T accounts. The district was not initially able to get in contact with an AT&T representative who could assist them. After several months of correspondence with AT&T, the district engaged the services of their school attorney to assist in working through the outstanding payment issues. The district contacted Kellogg & Sovereign Consulting in November, 2013 to request a review of their E-rate filings. After review of their prior funding history, we were able to identify the above 6 funding requests that had not had E-rate funds disbursed even though the applicant had received the services during the applicable funding years.

Since several of the funding requests with AT&T were disbursed and some were not, most likely the reason that the above 6 FRNs were not disbursed was due to the additional form requirements of AT&T for applicants who select the SPI method. Additionally, during the 2008 funding year, AT&T moved their E-rate support functions to a centralized nation-wide center. The local AT&T representatives, Angela Eversole and Pam Cloud, no longer provided the service of assisting schools in their area with the AT&T forms.

AT&T Internet Access and Transport Services: 2008 FRNs 1759877 and 1759941; 2010 FRNs 2056162 and 2056186.

The services provided by AT&T for Internet and transport (FRNs 1759877, 1759941, 2056162, and 2056186) are also supported by the Oklahoma Universal Services fund (OUSF). Since the applicant received credits on their bills during the 2009 funding year, they were not contacted by the service provider regarding late payments. Because it usually takes considerable amount of time for both E-Rate and OUSF support payments to be credited to the bill, the applicant did not worry about the high balance due on their AT&T bills until AT&T collections began contacting the applicant during the summer of 2013.

AT&T Mobility. 2010 FRN 2045737 and 2011 FRN 2371265

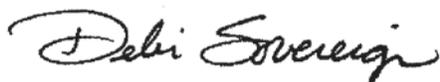
The services provided by AT&T Mobility are for cellular services. AT&T Mobility also requires an additional step in order for an applicant to receive discounts on their bills. After funding is received, AT&T Mobility sends an email to the applicant with their in house form to be completed. The AT&T form must be completed exactly as AT&T specifies. As long as the applicant correctly completes the

form and returns to aT&T an AT&T successfully receives the form, then discounts may be applied to the applicant's bill. The applicant is not sure why the AT&T Mobility form was not completed but assumed that most likely their consultant did not receive the email and the district was not aware of the requirement by AT&T Mobility. The district assumed that the consultant was taking care of requesting the SPI method since the applicant received discounts in prior years that were handled by the consultant.

The applicant has confirmed that charges for the services funded as listed above were incurred during each applicable funding year and the applicant has verified that they have the supporting documentation. The district will be able to provide invoices in order for the service provider to issue discounts or for the applicant to file Forms 472 (Billed Entity Applicant Reimbursement forms).

The applicant, therefore, is requesting an invoice deadline extension for the funding requests listed above.

Respectfully submitted,



Debi Sovereign
Consultant

Attachment:

- A. Letter of Agency

ATTACHMENT 6

Letter of Agency

**Letter of Appeal - Petition for Waiver: Invoicing Deadline Extension Request
Fanshawe School District 39, Fanshawe, Oklahoma
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444**

E-RATE LETTER OF AGENCY

I authorize Jane Kellogg, Debi Sovereign, Mel Van Patten, Mandy Wood, Natalie Green or Stacy Simpkins, representatives of Kellogg & Sovereign® Consulting, LLC (collectively "KSLLC"), to submit Federal Communications Commission ("FCC") Forms 470, 471, 486, 500, 472 and other forms requested by the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") on behalf of our school district. We also authorize the aforementioned representatives to act as our agents in soliciting and receiving proposals, and preparing comparisons of proposals from service providers.

Name of Applicant (USAC Entity #): FANSHAWE SCHOOL DISTRICT 39, FANSHAWE, OK (BEN# 140395)
FUNDING YEARS AUTHORIZED: 2008-2017

Although not exclusive, KSLLC is specifically authorized to conduct the following actions:

- ♦ Prepare and submit documentation on behalf of the Applicant to USAC or the FCC in compliance with E-Rate program rules and regulations.
- ♦ Act as our agent in working with representatives of the FCC or USAC to provide information as requested during application review, selective reviews, site visits, audits and any other activity associated with review of our applications.
- ♦ Prepare Requests for Proposal ("RFPs") to be posted to the KSLLC website and distributed to appropriate service providers.
- ♦ Provide information to service providers as needed to clarify information in RFPs and Forms 470.
- ♦ Solicit and receive proposals from service providers for requested services.
- ♦ Complete contracts for eligible E-Rate services as specifically directed by the Applicant's authorized representative.

I also understand that in submitting these forms on our behalf, representatives of Kellogg & Sovereign® Consulting, LLC are making certifications for our school district. By signing this letter of agency under oath, I make the following certifications as required by the FCC¹:

I certify that the school(s) I represent 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(ies) I represent or the entities listed on this application will secure 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 to be listed on our application will secure access to all of the resources necessary to pay the discounted charges for eligible services from funds to which access will be secured in the 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).

I certify that, if required by Commission rules, all of the individual school(s) I represent are or will be covered by technology plans that cover all 12 months of the applicable funding year(s), and that have been or will be approved by a state or other authorized body or an SLD-certified technology plan approver prior to the commencement of service.

¹ Certifications per FCC Forms 470, 471 and 486. <http://www.usac.org/sl/tools/forms.aspx> 5/20/2014
Fanshawe School District 39 Petition for Waiver - Letter of Appeal
November 18, 2014

I authorize Kellogg & Sovereign® Consulting, LLC to post my Form 470 and (if applicable) make my RFP available for at least 28 days before the applicant considers all bids received and selects service providers. I certify that all bids submitted will be carefully considered and the bid(s) selected will be for the most cost-effective service or equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology plan goals.

I certify that I will review all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities I represent will comply 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 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. §§ 54.500, 54.513. Additionally, I certify that the entity or entities listed on our forms have or will not receive anything of value or a promise of anything of value, other than services and equipment sought by means of forms submitted with the Schools & Libraries Division, from the service provider, or any representative or agent thereof or any consultant in connection with the request for services.

I certify that I and the entity(ies) I represent will comply with all program rules, including recordkeeping requirements, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There will be signed contracts covering all of the services listed on the 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 five years (or whatever retention period is required by the rules in effect at the time of this certification), after the last day of service delivered. 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 the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) I represent. I certify that I am authorized to sign this Letter of Agency and all information to be provided to Kellogg & Sovereign® Consulting, LLC for the E-Rate submission will be true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to the associated applications have complied with the terms, conditions, and purposes of this program, that no kickbacks were or will be paid to anyone and that false statements on FCC forms 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 that will be listed on our application, or any person associated in any way with my entity and/or the entities listed on our 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 listed on our FCC forms are for discounts for products or services that contain both eligible and ineligible components that Kellogg & Sovereign® Consulting, LLC on our behalf will allocate the cost of the contract to eligible and ineligible components as required by the Commission's rules at 47 C.F. R. § 54.504(g)(1),(2).

I certify that funding requests included on the related FCC forms will not constitute a request for internal connections services, except basic maintenance services, in violation of the Commission requirement that eligible entities are not eligible for such support more than twice every five funding years as required by the Commission's rules at 47 C.F. R. § 54.506(c).

I certify that the non-discount portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services featured on the applicable FCC forms will be net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

I certify that prior to the commencement of service, the school(s) I represent will be in compliance with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l).

I certify that I am authorized to sign this Letter of Agency and, to the best of my knowledge, information and belief, all information provided to KSLLC for E-Rate submission is true. If any of the statements made above are incorrect, fraudulent or misleading, the undersigned and their institution agrees to indemnify KSLLC, its members, employees and agents of any and all liability, legal fees or actions that may arise from the incorrect, fraudulent or misleading statement(s).

Applicant Name, City, State: FANSHAWE SCHOOL DISTRICT 39, FANSHAWE, OK

Signature of Authorized Person: *Jerry Carpenter* Date: _____

Printed Name of Authorized Person: Jerry Carpenter Title: Superintendent

This authorization shall remain in effect until KSLLC is notified of its cancellation in writing via certified mail.

SWORN AFFIDAVIT

STATE OF Oklahoma)
)ss.
COUNTY OF LeFlore)

On this 16 day of July, 2014, before me, the subscriber, a Notary Public in and for said State and County, personally appeared Jerry Carpenter, known or identified to me to be the person whose name is subscribed to this Letter of Agency, and acknowledged that he/she is authorized on behalf of said entity/entities to execute all documents pertaining hereto and acknowledged to me that he/she executed the same as his/her voluntary act and deed on behalf of said organization.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my seal in said State and County on the day and year last above written.

Notary Seal
NOTARY PUBLIC State of Okla.
SALLY MCGOWEN
Comm. # 09001320
Expires 02-06-2017

Sally McGowen
(Signature of Notary)

My Commission Expires: 2-6-17