



CHILD, Inc.

160 Draper Avenue
Warwick, RI 02889

March 9, 2015

Letter of Appeal

Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

CC Docket No 02-6

Request for Waiver of "Administrator's Decision on Invoice Deadline Extension Request" regarding FRN 2290948, issued on January 16, 2015

Authorized person who can best discuss this Appeal with you

Richard Larson
eRate 360 Solutions, LLC
322 Route 46W, Suite 280W
Parsippany, NJ 07054

Phone: (888) 535-7771 ext 102
Fax: (866) 569-3019
Email: rlarson@erate360.com
(preferred mode of contact)

Information

<u>Entity</u>	Child, Inc.
<u>Billed Entity Number</u>	16044571
<u>Funding Year</u>	2012-13
<u>471 Number</u>	843812
<u>Funding Request Number</u>	2290948
<u>Service Provider / SPIN</u>	Advanced Network Systems / 143032461
<u>BEAR Reimbursement</u>	\$2,291.08

Document Being Appealed: "Administrator's Decision on Invoice Deadline Extension Request" regarding FRN 2290948, issued on January 16, 2015¹

ADL Items Being Appealed (same for all three FRNs):

Decision on Request "This serves as acknowledgement and dismissal of your request for a deadline extension for the following FRNs"

Explanation "Current deadline extension rules and procedures do not allow approval for the reason submitted."

Request for Waiver:

Child Inc. respectfully requests the Commission to waive its new policy on BEAR deadline extensions and instruct the Schools and Libraries Division's (SLD) to accept Child Inc.'s October 27, 2014 Invoice Deadline Extension Request for FRN 2290948 in 471 application

¹ Email from Schools and Libraries Division, Universal Service Administrative Company (deadline@sl.universalservice.org), to John Harvey (jharvey@erate360.com), eRate 360 Solutions (consultant for Child Inc.), dated Friday, January 16, 2015; subject: "Administrator's Decision on Invoice Deadline Extension Request", regarding ten FRNs including FRN 2290948.

number 843812.² This will permit Child Inc. to submit a Form 472 (BEAR) for reimbursement of \$2,291.08 of E-rate discounts for this FRN.

On 10/15/2014 Child Inc.'s E-rate consultant, John Harvey, attempted to submit online BEAR # 2088711 for FRN 2290948,³ the online system rejected it with a message that the service provider, Advanced Network Systems (ANS), had failed to file its Form 473 (SPAC) for FY 2012-13. The SLD BEAR system does not allow an applicant to submit a BEAR form for a service provider who has not filed a SPAC form for that funding year.

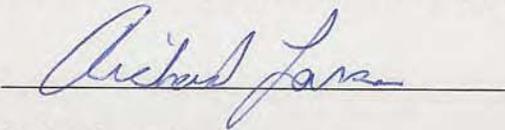
Child Inc.'s CFO, Mary Springer, and their E-rate consultant, John Harvey, both advised the ANS CEO, Stephen Bracewell of this requirement repeatedly, and in spite of support and advice from Mr. Harvey, ANS failed to file the SPAC form in time for SLD to approve it by the 10/28/15 invoicing deadline.^{4,5,6}

On 10/27/14, when the SPAC for FY 2012 was not listed for ANS on the SLD website, Mr. Harvey submitted the request for extension of the invoicing deadline. The FY 2012 SPAC was still not listed on 10/28/14, preventing Child Inc. from submitting the BEAR for FRN 2290948.

Because of this failure of the service provider, a circumstance beyond the control of Child Inc., the BEAR form for reimbursement of \$2,291.08 of E-rate discounts could not be filed. For a small school, these funds are important. Child Inc. respectfully requests the Commission to grant this waiver.

We thank the Commission for its consideration in this matter. We are available to respond to questions or to provide any further information requested by the Commission in its review of this appeal.

Authorized signature for this Appeal⁷



Richard Larson
eRate 360 Solutions, LLC
322 Route 46W, Suite 280W
Parsippany, NJ 07054

Date: 3/9/15

Phone: (888) 535-7771 ext 102
Fax: (866) 569-3019
Email: rlarson@erate360.com
(preferred mode of contact)

² Email from the SLD to John Harvey, eRate 360 Solutions consultant for Child Inc., on October 27, 2014, subject: "SLD Inquiry #: 22- 686372 Received", acknowledging SLD's receipt of Mr. Harvey's requested extension.

³ FCC Form 472 # 2088711 for SPIN 143032461 (Advanced Network Systems), FRN 2290948 in Form 471 # 843812, prepared for submission on 10/15/2014 10:28 AM by Child Inc.

⁴ Email exchange between John Harvey, eRate 360 Solutions consultant for Child Inc., and Mary Springer, CFO for Child Inc., from 10/16 through 10/22/14, subject: "Advanced Network Systems BMIC FY2012-13".

⁵ Email exchange between John Harvey, eRate 360 Solutions consultant for Child Inc., and Stephen Bracewell, CEO of Advanced Network Systems, from 10/21 through 10/22/14, subject: "ANS SPAC required re Child Inc - 2012".

⁶ Email exchange between John Harvey, eRate 360 Solutions consultant for Child Inc., and Stephen Bracewell, CEO of Advanced Network Systems, from 10/22 through 10/23/14, subject: "SPAC re Child Inc.".

⁷ "Letter of Agency" from Lynda Dickinson, CEO for Child Inc., authorizing employees of eRate 360 Solutions, LLC, to perform e-rate services on behalf of Child Inc.

From: deadline@sl.universalservice.org
To: jharvey@erate360.com
Subject: Administrator's Decision on Invoice Deadline Extension Request
Date: Friday, January 16, 2015 4:29:17 PM

This serves as acknowledgement and dismissal of your request for a deadline extension for the following FRNs:

2290948

2299201
2301780
2301783
2301784
2308538
2308563
2308574
2316644
2324066

Current deadline extension rules and procedures do not allow approval for the reason submitted.

TO APPEAL THIS DECISION:

If you wish to appeal the decision indicated in this letter, your appeal must be POSTMARKED within 60 days of the above date on 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 e-mail address (if available) for the person who can most discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Administrative Decision you are appealing. Indicate the relevant funding year and the date of this letter. Your letter of appeal must also include the Billed Entity Name, the Form 471 Application Number, and the SLD Invoice Number from the top of your letter.
3. When explaining your appeal, copy the language or text from this letter that is at the heart of your appeal to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal on paper, please send your appeal to:
Letter of Appeal, Schools and Libraries Division, 30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We encourage the use of either the e-mail or fax filing options.

Schools and Libraries Division
Universal Service Administrative Company

This e-mail has been generated programmatically. Please do not respond to this e-mail.

From: sldnoreply@sl.universalservice.org
To: jharvey@erate360.com
Subject: SLD Inquiry #: 22-686372 Received
Date: Monday, October 27, 2014 10:42:28 AM

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-686372.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl.

Thank you.

Following is the information you submitted:

*[FirstName]=John [LastName]=Harvey [JobTitle]=Snr. Compliance Officer
[EmailAddress]=jharvey@erate360.com [WorkPhone]=8885357771110
[FaxPhone]=8665693019 [PreviousCaseNumber]=0 [FormType]=Invoice Extension
[Owner]=DEADLINEEXTENSIONS [DateSubmitted]=10/27/2014 10:42:15 AM
[AttachmentFlag]=N[Question2]=I request an extension of the filing deadline for Form 472
for the following: Contact Person: John E. Harvey Jr. Contact Phone: 888-535-7771 x110
Contact Fax: 866-569-3019 Contact Email: jharvey@erate360.com Applicant: CHILD, INC.
BEN: 16044571 471 Application #: 843812 FRN: 2290948 SPIN: 143032461 Service
Provider: Advanced Network Systems Amount of Invoice: \$5,818.50 Reason for request:
Service Provider has not completed process of filing for SPAC.*

NOTE 3

Need Help?

- [BEAR Home](#)
- [New BEAR Form](#)
- [Track Form](#)
- [Bulk Download](#)
- [Terms and Conditions](#)
- [Logout](#)

View BEAR Invoice

[\[EDIT THIS INVOICE \]](#)

PRINTABLE PAGE

Invoice ID: 2088711
Created on 10/15/2014 10:28 AM
Last updated on 10/15/2014 10:28 AM
Applicant Form Identifier FY15_Child_ANS

Block 1: Header Information

[Need Help?](#)

1. Billed Entity Name CHILD, INC.	2. Billed Entity Number 16044571	3. Service Provider Identification Number (SPIN) 143032461
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4. Contact Name	John E. Harvey Jr
5. Contact Telephone Phone	(888) 535-7771 ext. 110
Contact Fax	(866) 569-3019
Contact Email	jharvey@erate360.com

6. Total Reimbursement Amount
 (total from Block 2, Column 14)
 \$ 2291.08

Block 2: Line Item Information Per Funding Request Number

[Need Help?](#)

7. FCC Form 471 Application Number	8. Funding Request Number (FRN)	10. Customer Billed Date	11. Shipping date to Customer or Last Day of Work Performed (mm/dd/yyyy)	12. Total (Undiscounted) Amount for Service	13. Discount Rate	14. Discount Amount Billed to USAC (Column 12 multiplied by Column 13)	Approval Status
1) 843812	2290948	7/1/2012		\$ 2545.64	90	\$ 2291.08	AWAITING SP CERTIFICATION

Block 3: Billed Entity Certification

[Need Help?](#)

Contact Information for Billed Entity Authorized Person:

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form. To see a copy of the Terms and Conditions to which you previously agreed, please click on the "Terms and Conditions" menu above.

Submission Date

17. Name JOHN E. HARVEY JR	19. Phone Number (888) 535-7771 ext. 110
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18. Title/Position SNR. COMPLIANCE OFFICER
20. Address 1 322 ROUTE 46W, SUITE 280W
Address 2 ERATE 360 SOLUTIONS, LLC
City PARSIPPANY
State NJ
Zip Code 07054 -

19a. Fax Number (866) 569-3019
19b. Email jharvey@erate360.com
19c. Name of Authorized Person's Employer ERATE 360 SOLUTIONS, LLC

27. Applicant Remittance Information

Name Mary Springer
Title/Position CFO
Phone Number (401) 732-5200
Address 1 Child Inc.
Address 2 160 Draper Avenue
City Warwick
State RI
Zip Code 02889

Additional Comments:

Advanced Network Systems, Incorporated

OMB Number 3060 - 0856 Form 472

[SLD Home](#) | [Contact Us](#)

Client Service Bureau: 1-888-203-8100

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From: Mary Springer [<mailto:mspringer@childincri.org>]
Sent: Wednesday, October 22, 2014 10:40 AM
To: John Harvey
Subject: RE: Re Advanced Network Systems BMIC FY2012-13

Just talked to him – he'll fill this out today. thanks.

From: John Harvey [<mailto:jharvey@erate360.com>]
Sent: Wednesday, October 22, 2014 10:30 AM
To: Mary Springer
Subject: RE: Re Advanced Network Systems BMIC FY2012-13

I spoke to Steve yesterday. Only he can apply for a SPAC. I told him where to get the info on USAC's website. He's should be able to get it done today. But you can give him a call to make sure.

John E. Harvey Jr.
Senior Compliance Officer



eRate 360 Solutions, LLC

322 Route 46W, Suite 280W
Parsippany, NJ 07054
jharvey@erate360.com
Toll Free: 888-535-7771 ext.110
Cell: 973-946-3531
Fax: 866-569-3019
<http://www.erate360.com/>



From: Mary Springer [<mailto:mspringer@childincri.org>]
Sent: Wednesday, October 22, 2014 9:59 AM
To: John Harvey
Subject: RE: Re Advanced Network Systems BMIC FY2012-13

Anything from him yet? I've been in touch....

If not, what's involved in filing a SPAC Is there anything I can send him to move this along? Thanks.

From: John Harvey [<mailto:jharvey@erate360.com>]
Sent: Thursday, October 16, 2014 12:35 PM
To: Mary Springer
Subject: Re Advanced Network Systems BMIC FY2012-13

Mary – I’m trying to submit your BEAR for basic maintenance for ANS Inc. for 2012-13. I am unable to do so because ANS has not filed a SPAC for 2012. I’ve been trying to contact Mr. Bracewell to have this sorted out, with no success. (left a few voice msgs)

If I cannot submit by the deadline of 10/28/14 you stand a chance of losing approved funding of \$2,291.08. USAC have said no extensions will be approved for 2012-13.

Can you also try to contact him about filing a SPAC. Only his contact phone is listed on USAC’s website, 401-834-3413 see below.

SPIN	Service Provider Name	Doing Business As	Contact Name	Contact Address	Contact Phone	Form 499 Filer	SPAC Filed
143032461	Advanced Network Systems, Incorporated	Advanced Network Systems, Incorporated	Stephen M Bracewell	103 Higginson Ave , Lincoln, RI 02865	401834-3413		2008 2009 2010 2011

John E. Harvey Jr.
Senior Compliance Officer



eRate 360 Solutions, LLC

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jharvey@erate360.com

Toll Free: 888-535-7771 ext.110

Cell: 973-946-3531

Fax: 866-569-3019

<http://www.erate360.com/>



From: John Harvey <jharvey@erate360.com>
Sent: Wednesday, October 22, 2014 9:35 AM
To: 'Stephen Bracewell'
Subject: RE: ANS SPAC required re Child Inc - 2012

Steve – your best bet is to call Client Services Bureau CSB @ 888-203-8100.

John E. Harvey Jr.
Senior Compliance Officer



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Fax: 866-569-3019
<http://www.erate360.com/>



From: Stephen Bracewell [<mailto:Steve@advancednetworksystems.com>]
Sent: Tuesday, October 21, 2014 9:33 PM
To: 'John Harvey'
Cc: Adam MacLure; Derek Lebel
Subject: RE: ANS SPAC required re Child Inc - 2012

John,

Can form 473 be filed electronically?

I can't seem to find the on line version on the site.

Stephen Bracewell | Advanced Network Systems, Inc.
101 Higginson Ave Suite 103B | Lincoln, RI. 02865 | ☎: 834-3413 | ✉: sbracewell@advancednetworksystems.com

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From: John Harvey [<mailto:jharvey@erate360.com>]
Sent: Tuesday, October 21, 2014 10:05 AM
To: Stephen Bracewell
Subject: ANS SPAC required re Child Inc - 2012

Steve – this is SLD’s home page - <http://www.usac.org/sl/tools/default.aspx>

Their link re filings - http://www.sl.universalservice.org/Forms/SPIN_Contact_Display.asp

Regards,

John E. Harvey Jr.
Senior Compliance Officer



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Cell: 973-946-3531

Fax: 866-569-3019

<http://www.erate360.com/>



From: Stephen Bracewell <Steve@advancednetworksystems.com>
Sent: Thursday, October 23, 2014 12:09 PM
To: 'John Harvey'
Cc: 'Mary Springer'
Subject: RE: SPAC re Child Inc.

Follow Up Flag: Follow up
Flag Status: Flagged

John,

I will send these express mail so they have them tomorrow.

Stephen Bracewell | Advanced Network Systems, Inc.

101 Higginson Ave Suite 103B | Lincoln, RI. 02865 | ☎: 834-3413 | ✉: sbracewell@advancednetworksystems.com



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From: John Harvey [<mailto:jharvey@erate360.com>]
Sent: Thursday, October 23, 2014 12:05 PM
To: Stephen Bracewell
Cc: 'Mary Springer'
Subject: RE: SPAC re Child Inc.

Steve – Yes that is all that is required at this time.
However it means I will have to file for an Invoice Deadline Extension with USAC for 2012-13.
And based on what we’ve been hearing we really don’t know if it will be approved as it will be over 12 months since the service fund year ended. So we’ll all have to keep our fingers crossed!

John E. Harvey Jr.
Senior Compliance Officer



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Fax: 866-569-3019
<http://www.erate360.com/>



From: Stephen Bracewell [<mailto:Steve@advancednetworksystems.com>]
Sent: Thursday, October 23, 2014 11:53 AM
To: 'John Harvey'
Cc: 'Mary Springer'
Subject: RE: SPAC re Child Inc.

John,

Heading to the post office shortly.

Will be filing form 473 for the period 7-1-12 to 6-30-13 and a second for the period 7-1-13 to 6-30-14

Please let me know if these are the only periods that you need at this time.

Thanks

Stephen Bracewell | Advanced Network Systems, Inc.

101 Higginson Ave Suite 103B | Lincoln, RI. 02865 | ☎: 834-3413 | ✉: sbracewell@advancednetworksystems.com



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From: John Harvey [<mailto:jharvey@erate360.com>]
Sent: Wednesday, October 22, 2014 5:46 PM
To: Stephen Bracewell
Cc: 'Mary Springer'
Subject: SPAC re Child Inc.

Steve – were you successful filing for your SPAC today? I don't see the update on their website.

John E. Harvey Jr.
Senior Compliance Officer



eRate 360 Solutions, LLC

322 Route 46W, Suite 280W

Parsippany, NJ 07054

jharvey@erate360.com

Toll Free: 888-535-7771 ext.110

Cell: 973-946-3531

Fax: 866-569-3019

<http://www.erate360.com/>



NOTE 7

Letter of Agency

Child, Inc.
Billed Entity Number: 16044571

Letter of Agency For FY 15 (2012 - 2013)

I hereby authorize eRate 360 Solutions, LLC and its employees: Keith C. Oakley, Steve Tenzer, Rich Larson, Carlos Alvarez, Matt Hetman, Fred Josephs, and Bert Garofano to submit FCC Form 470, FCC Form 471, and other E-rate forms, and to submit various change applications such as SPIN changes and service substitutions, to the Schools and Library Division of the Universal Service Administrative Company on behalf of **Child, Inc.** for all eligible services outlined in the most current "Eligible Services List" published by USAC. I understand that, in submitting these forms on our behalf, you are making certifications for **Child, Inc.** By signing this Letter of Agency, I make the following certifications

- (a) I certify that **our school** is a school 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.
- (b) I certify that **our school** has 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 to the extent that the Billed Entity is passing through the non-discounted charges for the services requested under this Letter of Agency, that the entities I represent have secured access to all of the resources to pay the non-discounted charges for eligible services from funds to which access has been secured in the current funding year.
- (c) I certify that **our school** is covered by a technology plan(s) that is written, that covers all 12 months of the funding year, and that has been or will be approved by a state or other authorized body, or an SLD-certified technology plan approver, prior to the commencement of priority two services. The plan(s) is written at the following level(s):
- an individual technology plan for using the services requested in this application; and/or
- higher-level technology plan(s) for using the services requested in this application; or
- no technology plan needed; applying for basic local, cellular, PCS, and/or long distance telephone service and/or voice mail only.
- (d) I certify that the services the district purchases at discounts provided by 47 U.S.C. § 254 will be used solely 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 rules of the Federal Communications Commission (Commission or FCC) at 47 C.F.R. § 54.500(et seq.).
- (e) I certify that **our school** has 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. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.
- (f) 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.

- (g) I certify that I will retain required documents for a period of at least five years 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.
- (h) I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) covered by this Letter of Agency. I certify that I am authorized to make this request on behalf of the eligible entity(ies) covered by this Letter of Agency, that I have examined this Letter, that all of the information on this Letter is true and correct to the best of my knowledge, that the entities that will be receiving discounted services under this Letter 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) 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, or any person associated in any way with my entity and/or the entities, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.
- (j) I certify, on behalf of the entities covered by this Letter of Agency, that any funding requests for internal connections services, except basic maintenance services, applied for in the resulting FCC Form 471 application are not in violation of the Commission requirement that eligible entities are not eligible for such support more than twice every five funding years beginning with Funding Year 2005 as required by the Commission's rules at 47 C.F.R. § 54.506(c).
- (k) I certify that, to the best of my knowledge, the non-discount portion of the costs for eligible services will not be paid by the service provider. I acknowledge that 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.
- (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 eRate 360 Solutions, LLC for E-rate submission is true.

District: Child, Inc.

Date: 7 October 11

Signature: Lynda Dickinson

Printed Name: LYNDA DICKINSON

Title: CEO