

# E-RATE CENTRAL

Great Lakes Office  
3221 Washington Blvd., Suite 1  
Cleveland Heights, Ohio 44118-2546  
Tel: 516-801-7824 • Fax: 516-801-7834

Ilze K. Lacis  
21 April 2015

To: James Bachtell via email ([james.bachtell@fcc.gov](mailto:james.bachtell@fcc.gov))

Per: Melissa Askew, ESFC

From: Ilze Lacis, Consultant/E-Rate Central

For: Cleveland Municipal School District (BEN 129482)

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James,

Melissa Askew contacted me this morning via telephone after I had sent an email asking for assistance in uploading attachments to a Request for Review and Waiver I had submitted yesterday, April 20, 2015.

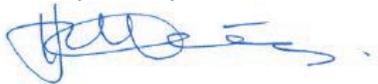
I had difficulty uploading the attachments, as I did not know the limits for size. One attachment, I believe, did go through, albeit as a separate submittal.

Thus, Melissa recommended I take the following action:

- (1) Resubmit via the ESFC tool the Request for Review and Waiver today, albeit the due date was yesterday, and I did submit yesterday (Confirmation number 2015420011891).
- (2) Split up the attachments in less than 10 mbs per upload, the ESFC maximum file size and submit via the 'continue ... modify' mode until all attachments have been resubmitted.
- (3) Send you a note via email explaining the circumstances

Needless to say, I regret the inconvenience. My ineptness may be due to the *angst* experienced during the last days of the E-rate Window close last week.

Thank you for your assistance and with kindest regards,



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Ilze Lacis  
Consultant  
E-Rate Central  
For  
Cleveland Municipal School District

## Your submission has been accepted

<b>ECFS Filing Receipt -</b>		
<b>Confirmation number:</b> <b>2015420011891</b>		
Proceeding		
	<b>Name</b>	<b>Subject</b>
	02-6	In the Matter of Schools and Libraries Universal Service Support Mechanism
<b>Contact Info</b>		
<b>Name of Filer:</b> Cleveland Municipal School District		
<b>Email Address:</b> ilacis@e-ratecentral.com		
<b>Address</b>		
<b>Address Line 1:</b> E-Rate Central-Great Lakes Office		
<b>Address Line 2:</b> 3221 Washington Blvd., Ste. #1		
<b>City:</b> Cleveland Heights		
<b>State:</b> OHIO		
<b>Zip:</b> 44118		
<b>+4:</b> 2546		
<b>Details</b>		
<b>Type of Filing:</b> WAIVER		
<b>Document(s)</b>		
<b>File Name</b>	<b>Custom Description</b>	<b>Size</b>
Appeal_FCC_4IBM_FRNs FY 2002&2003	IC/IBM-Waiver	51
ServDelvryExtend WaiverLtrr 20apr2015.pdf	Letter	KB
<b>Disclaimer</b>		
<p>This confirmation verifies that ECFS has received and accepted your filing. However, your filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, a virus, or automated links to other documents.</p> <p>Filings are generally processed and made available for online viewing within one business day of receipt. You may use the link below to check on the status of your filing:</p> <p><a href="http://apps.fcc.gov/ecfs/comment/confirm?confirmation=2015420011891">http://apps.fcc.gov/ecfs/comment/confirm?confirmation=2015420011891</a></p> <p>For any problems please contact the Help Desk at 202-418-0193.</p>		

20 April 2015

Ilze K. Lacis

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.**

In the Matter of: )  
)  
Request for Review and/or Waiver of )  
Decision of the Universal Service )  
Administrator ) CC Docket No. 02-6  
)  
By )  
)  
Cleveland Municipal School District )  
Cleveland, Ohio )

TO: Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street. SW  
Washington, D.C. 20554

RE: The Cleveland Municipal School District (“Cleveland”, “District”), *a.k.a.* Cleveland City School District, respectfully requests that the Federal Communications Commission (“Commission”, “FCC”) review and reverse the Universal Service Administrative Company’s (“Administrator”, “USAC”) Schools and Libraries Division (“SLD”, “E-Rate Program”) decisions denying four (4) implementation extension requests for Internal Connections services relative to Funding Request Numbers (“FRNs”) 865736, 865118, 1045303 and 1046950 in FCC Forms 471 323210, 323152, 380114, and 380618. This Request for Review and/or Waiver for the four FRNs is made to the Commission pursuant to 47 U.S.C. at §§ 54.719(c) to 54.725 seeking redress for:

*Billed Entity Number* 129482 Cleveland City School District

20 April 2015

Ilze K. Lacis

*FCC Form 471 Application Numbers 471-323210*  
*Funding Request Numbers 865736*  
*SPIN number: 143005607*  
*Funding Commitment Decision Letter date: March 10, 2003*  
*Date of Administrator's Decision on Appeal Letter: February 19, 2015*

*FCC Form 471 Application Numbers 471-323152*  
*Funding Request Number 865118,*  
*SPIN number: 143005607*  
*Funding Commitment Decision Letter date: March 10, 2003*  
*Date of Administrator's Decision on Appeal Letter: February 19, 2015*

*FCC Form 471 Application Numbers 471-380114*  
*Funding Request Number 1045303*  
*SPIN number: 143005607*  
*Funding Commitment Decision Letter date: January 20, 2004*  
*Date of Administrator's Decision on Appeal Letter: February 19, 2015*

*FCC Form 471 Application Numbers 471-380618*  
*Funding Request Number 1046950*  
*SPIN number: 143005607*  
*Funding Commitment Decision Letter date: June 16, 2004*  
*Date of Administrator's Decision on Appeal Letter: February 19, 2015*

I. Introduction and Background:

The Cleveland Municipal School District recognizes the importance of effective and efficient administration of the E-rate program. The District understands that consistency in enforcing the deadlines for filing not only applications but also extensions for service delivery are essential to the effective operation of the program. Thus, it was with great consternation and alarm that the District discovered the deadline to request a service delivery extension for the four funding requests noted above had passed eleven (11) days hence. With great urgency, the District submitted a request to extend the implementation deadline for the four funding requests via the USAC Schools and Libraries "Submit a Question", a process that the District had used in many instances since the District's participation beginning in the first year of the E-rate program.

The urgency and importance of a successful implementation extension for the four funding requests was primary; the implementations directly affect the student and classroom (wireless

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Ilze K. Lacis

networks and associated cabling). Thus, the new methodology of submitting the Form 500 to request service delivery extensions was unwittingly by-passed. The incorrect course of action was recognized upon receipt of emails, one each for the four funding requests, from USAC. Without delay, the Forms 500, one for each of the four FRNs was prepared, signed and sent to USAC. These Forms 500 were denied by the Administrator via letter.

Below is the sequence and dates for the actions noted above. The dates are the same for the four FRNs in this Request for Review and Waiver.

Discovery of the Service Delivery Deadline	October 11, 2014
Submittal of a request to extend the Service Delivery Deadline via "Submit a Question" tool	October 11, 2014
Receipt of USAC e-mail stating to resubmit via Form 500	January 8, 2015
Submittal of Forms 500 for the four FRNs	January 8, 2015
Receipt of Administrator's Decision on Implementation Extension Request	February 19, 2015

The Administrator denied the implementation extension explaining that the "(r)equ<sup>e</sup>st (was) received after the FCC deadline for Implementation Deadline Extension request(s) which was 09/30/2014". Furthermore, the Administrator stated in the denial letter that "In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances."

## II. Discussion

The Cleveland Municipal School District has exercised diligence in adhering to the deadline regulations since its participation in the first year of the E-rate program. It is clear to the District that strict adherence enhances the program's efficacies when participants submit the requisite forms and data in accordance thereto. However, while the Administrator cannot waive any such rule, the Commission has waived past deadline submittals for not only Forms 471<sup>1</sup>, the most critical of Forms, but also late-filed Item 21 attachments, and late filed certifications<sup>2</sup>. For Forms 471 filed within two weeks (14 calendar days) of the Window close, the FCC in most instances has waived the deadline<sup>3</sup>.

Furthermore, the District contends that there *are* special circumstances that warrant an implementation deadline extension. The four funding requests for which implementation deadlines are requested herein are large, complex and interrelated. Thus, the installations must be

<sup>1</sup> DA 14-1526, DA 06-2458

<sup>2</sup> CC Docket No. 02-6. Order, 27 FCC Rcd 5319, 5319-20, para. 2

<sup>3</sup> DA 14-1526

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Ilze K. Lacis

installed during the summer months when students are not in classrooms. The Commission will note that significant progress has been made; however, the projects are not completed. It is of decisive importance that the projects for wireless LANs and associated cabling continue. Thus, the implementation extension is clearly due to the District's service provider's inability to complete the installation during schools days when students are in classrooms.<sup>4</sup> The installations, perforce must be installed during the summer months.

Without the extended implementation deadline, some schools and classrooms will have wireless capabilities, while other schools will not. This, then creates inequities among the District's schools' wireless capacities, particularly as it concerns student testing needs.

### III. Request for Review and Waiver

The Cleveland Municipal School District respectfully requests the Federal Communication Commission to grant the waiver to extend the implementation extension for FRNs 865736, 1046950, 865118 and 1045303 for the reasons stated above. The Commission has waived procedural deadlines<sup>5</sup> to effectuate the E-rate program's goals, established in the Telecommunications Act of 1996<sup>6</sup>. At that time, Congress directed the Commission to "enhance...access to advanced telecommunications and information services for all public and non-profit elementary and secondary schools classrooms, health care providers, and libraries."<sup>7</sup>

The Cleveland Municipal School District has exhibited stringent adherence to deadlines since Year 1 of the program. It stands to reason that the Commission's waivers for procedural deadlines for many of the program's deadlines, including the important Form 471, would allow for the same waiver to apply to the implementation extension deadlines requested herein for the four funding requests.

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<sup>4</sup> DA 06-2458

<sup>5</sup> See, e.g., Requests for Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 25 FCC Rcd 9256, 9259-60, paras. 8-9 (2010) (finding special circumstances exist to justify granting waiver requests where, for example, petitioners filed their FCC Forms 471 within 14 days after the FCC Form 471 filing window deadline; or filed their FCC Forms 471 on time, but failed to timely file their certifications, and denying waivers where petitioners failed to present special circumstances justifying waivers of our rules); Requests for Waiver and Review of Decisions of the Universal Service Administrator by Anderson Elementary School et al.; Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, 27 FCC Rcd 5319, 5319-20, para. 2 (Wireline Comp. Bur. 2012) (treating late-filed item 21 attachments like late-filed certifications).

<sup>6</sup> 47 U.S.C. § 254(h)(1)(B)

<sup>7</sup> 47 U.S.C. § 254(h)(2)

# E-RATE CENTRAL

Great Lakes Office  
3221 Washington Blvd., Suite 1  
Cleveland Heights, Ohio 44118-2546  
Tel: 516-801-7824 • Fax: 516-801-7834

20 April 2015

Ilze K. Lacis

Respectfully submitted for the Cleveland Municipal School District by



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Ilze K. Lacis  
Consultant/E-Rate Central-Great Lakes Office  
3221 Washington Blvd.,  
Suite #1  
Cleveland Heights, OH 44118-2546

CC: Dedra Ross, Senior E-rate Specialist, Cleveland Municipal School District

Attachments:

- Attachment A: Correspondence for FRN 865736
- Attachment B: Correspondence for FRN 1046950
- Attachment C: Correspondence for FRN 865118
- Attachment D: Correspondence for FRN 1045303

Attachment A:

Correspondence for FRN 865736

**From:** [Ilze K. Lacis](mailto:Ilze.K.Lacis@sldcaseattachments@sl.universalservice.org)  
**To:** ["sldcaseattachments@sl.universalservice.org"](mailto:sldcaseattachments@sl.universalservice.org)  
**Subject:** RE: SLD Inquiry #: 22-680431 Received  
**Date:** Saturday, October 11, 2014 5:39:02 PM  
**Attachments:** [FY2010-ServiceDeliveryExtensionRequest-CMSD-IBM-WILAN-FRN865736 FY 2002 11oct2014.pdf](#)

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## E-Rate Central

Ilze K. Lacis  
(516) 801-7824  
[ilacis@e-ratecentral.com](mailto:ilacis@e-ratecentral.com)  
[www.e-ratecentral.com](http://www.e-ratecentral.com)



**From:** [sldcaseattachments@sl.universalservice.org](mailto:sldcaseattachments@sl.universalservice.org)

[mailto:[sldcaseattachments@sl.universalservice.org](mailto:sldcaseattachments@sl.universalservice.org)]

**Sent:** Saturday, October 11, 2014 5:33 PM

**To:** [ilacis@e-ratecentral.com](mailto:ilacis@e-ratecentral.com)

**Subject:** SLD Inquiry #: 22-680431 Received

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

The case number for your submission is 22-680431.

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.

You indicated in your submission that you wish to send us an attachment. To submit an attachment, please reply to this message and attach your attachment to the reply. Any additional information you wish to provide should be included in the attachment, not added to the text of this email.

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](http://www.usac.org/sl).

Thank you.

Here is the information you submitted:

[FirstName]=Ilze [LastName]=Lacis [JobTitle]=Consultant [EmailAddress]=[ilacis@e-ratecentral.com](mailto:ilacis@e-ratecentral.com) [WorkPhone]=5168017824 [FaxPhone]=5168017834  
[PreviousCaseNumber]=0 [FormType]=Other [Owner]=TCSB  
[DateSubmitted]=10/11/2014 5:31:21 PM [AttachmentFlag]=Y[Question2]=This is a

*request for an extension to the service delivery and installation deadline for FRN 865736 through September 30, 2015. Please see the attachment for more information. Thank you.*

# E-RATE CENTRAL

Great Lakes Office  
3221 Washington Blvd., Suite 1  
Cleveland Heights, Ohio 44118-2546  
Tel: 516-801-7824 • Fax: 516-801-7834

Ilze K. Lacis

11 October 2014

**To:**

Service Delivery Deadline Extension Request  
Schools and Libraries Division  
Correspondence Unit  
30 Lanidex Plaza West / P.O. Box 685  
Whippany, NJ 07054-0685

**Via 'Submit a Question' tool**

[sldcaseattachments@sl.universalservice.org](mailto:sldcaseattachments@sl.universalservice.org)

**RE: Service Delivery Deadline Extension Request**

**Contact person name:** Ilze Lacis  
**Contact information:** E-Rate Central-Great Lakes Office  
3221 Washington Blvd, Suite#1  
Cleveland Heights, Ohio  
44118  
(516) 801-7824  
[ilacis@e-ratecentral.com](mailto:ilacis@e-ratecentral.com)

**Beneficiary's name:** Cleveland Municipal School District

**Billed Entity Number:** 129482

**FCC Form 471 Application Number:** 323210

**Funding Request Number (FRN):** 865736

**Service Provider Name:** IBM Corporation

**Service Provider Identification Number (SPIN):** 143005607

**Reason for extension request:** The District needs more time to implement the approved internal connections equipment. This is a wireless LAN installation and has begun. This project is inter-related with other network installations (cabling), and requires additional time to complete the installations. The extension for service is requested through September 30, 2015.

**Documentation or certification:** The applicant requests an extension because the service provider was unable to complete delivery and installation for reasons beyond the service provider's control.

Please contact me for any further questions that you may have, so I may timely respond.  
Respectfully,



Ilze K. Lacis, Consultant, E-Rate Central

**From:** [Miller, Jesse](#)  
**To:** ["llacis@e-ratecentral.com"](mailto:llacis@e-ratecentral.com)  
**Subject:** FW: Service Deadline Extension Case 22-680431 FRN 865736  
**Date:** Thursday, January 08, 2015 1:51:30 PM

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Illze,

See email below

Thank you

**Jesse Miller**  
**Associate Manager/SLD Invoicing**  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.5296 | F: 973-599-6539  
[jemille@sl.universalservice.org](mailto:jemille@sl.universalservice.org)

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**From:** Miller, Jesse  
**Sent:** Thursday, January 08, 2015 1:46 PM  
**To:** lacisil@cmsdnet.net  
**Cc:** Kanyuck, William  
**Subject:** Service Deadline Extension Case 22-680431 FRN 865736

Hello Illze Lacis,

Applicants can request an extension of the deadline for delivery and installation of non-recurring services by completing the Block 2, Item 8 on the FCC Form500- Funding Commitment Adjustment Request Form. Since your request was not filed on a FCC Form 500, your request is dismissed. Please resubmit your request by filing the CC Form 500-Funding Commitment Adjustment Request Form. Instructions for filing the FCC Form 500 can be found on <http://www.usac.org/sl/tools/forms/default.aspx>.

Thank you  
**Jesse Miller**  
**Associate Manager/SLD Invoicing**  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.5296 | F: 973-599-6539  
[jemille@sl.universalservice.org](mailto:jemille@sl.universalservice.org)

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**Confidentiality Notice:** *The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is **STRICTLY PROHIBITED**. If you have received this e-mail in*

Do Not Write In This Area

**Universal Service for Schools and Libraries  
Funding Commitment Adjustment Request Form**

**Please read instructions before completing.**

(To be completed by schools, libraries or consortia.)

Applicant's Form Identifier: (Create your own code to identify THIS FCC Form 500)	FCC Form 500 Application Number: (To be assigned by administrator.)
--	--

**Block 1: Applicant Information**

1. Name of Billed Entity CLEVELAND CITY SCHOOL DISTRICT	2. Billed Entity Number 129482	3. Funding Year 2002
--	-----------------------------------	-------------------------

4. Complete Mailing Address of Billed Entity Street Address, P. O. Box or Route Number	City	State	Zip Code
1111 SUPERIOR AVENUE, E SUITE 1800	CLEVELAND	OH	44114

Telephone Number 216-838-0000	Fax Number	Email Address
----------------------------------	------------	---------------

**5. Contact Person Information**

Contact Person Name DEDRA ROSS
-----------------------------------

Mailing Address Street Address, P. O. Box or Route Number	City	State	Zip Code
4966 WOODLAND AVENUE, 3RD FL.	CLEVELAND	OH	44104

Telephone Number 216-432-4619	Fax Number 216-432-4632	Email Address Dedra.Ross@clevelandmetroschools.org
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**Type of Adjustment (Check all that apply)**

- Block 2: Services Adjustment**                       **Block 4: Equipment Transfer Notification**  
 **Block 3: Cancellation or Reduction of an FRN**

**DO NOT STAPLE**

Billed Entity Name CLEVELAND CITY SCHOOL DISTRICT Contact Name DEDRA ROSS

Billed Entity Number 129482 Contact Telephone Number 216-432-4619 Page 2

**Block 2: Services Adjustment**

**Remember: The Funding Request Number(s) (FRNs) listed on this form must be for the same Funding Year as listed in Block 1, Item 3.**

**New Service Start Date:** Complete if you wish to change the Service Start Date you listed on a previously filed FCC Form 486 in the funding year listed in Block 1, Item 3. This action will NOT increase funding.

**Contract Expiration Date:** Complete if the contract expiration date has changed and you wish to report the change to USAC. This action will NOT increase funding but you could combine it with a funding reduction.

**Service Delivery Extension:** Complete if you are requesting an extension of the deadline for delivery and installation of non-recurring services. You must submit this request to USAC on or before the September 30 following the close of the funding year. This action will NOT increase funding. **Note:** Complete the Contract Expiration Date (Item 7) also if your contract will expire prior to the installation or delivery of services.

**6. Service Start Date**

FCC Form 471	FRN(s)	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):

**7. Contract Expiration Date**

FCC Form 471	FRN(s)	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):

**Make as many copies of this page as needed, and number the completed pages so that they are all processed correctly. Please number your pages 2A, 2B, 2C, etc. and provide the number in space provided in Block 2.**

**8. Service Delivery Extension Request**

FCC Form 471 323210	FRN 865736
------------------------	---------------

Certify the reason for the service delivery and installation request by checking one of the boxes below:

- The service provider was unable to complete delivery and installation for reasons beyond the service provider's control.
- The service provider has been unwilling to complete delivery and installation after USAC withheld payment for those services on a properly-submitted invoice for more than 60 days after submission of the invoice.

**DO NOT STAPLE**

Billed Entity Name CLEVELAND CITY SCHOOL DISTRICT Contact Name DEDRA ROSS

Billed Entity Number 129482 Contact Telephone Number 216-432-4619 Page 3

**Block 3: Cancellation or Reduction of an FRN**

**Remember: The FRNs listed on this form must be for the same Funding Year as listed in Block 1, Item 3.**

**Cancel:** Complete if you wish to cancel an FRN. This action is irrevocable and the FRN cannot be reinstated later. This action would allow money to be put back into the Universal Service Fund for possible commitment to other applicants.

**Reduce:** Complete if you wish to reduce the amount of your funding commitment for a particular FRN. This action is irrevocable and the FRN cannot be increased later. This action would allow money to be put back into the Universal Service Fund for possible commitment to other applicants.

**Make as many copies of this page as needed, and number the completed pages so that they are all processed correctly. Please number your pages 3A, 3B, 3C, etc. and provide the number in space provided in Block 3**

**9. Cancel FRN**

FCC Form 471	FRN (s) (list individually)	Write in "CANCEL ALL" below if you wish to cancel all FRNs on FCC Form 471

**10. Reduce FRN**

FCC Form 471	FRN(s)	Original Commitment Amount from FCDL	New Commitment Amount AFTER Reduction

**DO NOT STAPLE**  
 Billed Entity Name CLEVELAND CITY SCHOOL DISTRICT Contact Name DEDRA ROSS  
 Billed Entity Number 129482 Contact Telephone Number 216-432-4619 Page 4

**Block 4: Equipment Transfer Notification**

**Remember: The FRNs listed on this form must be for the same Funding Year as listed in Block 1, Item 3.**

**11. Equipment Transfer:** Complete this section if you are transferring equipment from a closed entity to other eligible entities within three years of the date of purchase. Both the transferring and receiving entities must maintain detailed records documenting the transfer and the reason for the transfer for at least five years (or whatever retention period is required by the rules in effect at the time of this certification).

**Make as many copies of this page as needed, and number the completed pages so that they are all processed correctly. Please number your pages 4A, 4B, 4C, etc. and provide the number in space provided in Block 4**

FCC Form 471		FRN
Closed Entity Number		Closed Entity Name
Purchase Date	Transfer Date	Transfer Reason

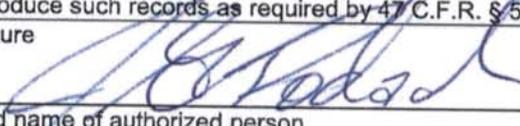
Check here if transfer is temporary. Enter projected return date

List all entities receiving the equipment. Receiving Entity(s) Number(s)	Receiving Entity Name (s)	Equipment Received Equipment name, make and model

**DO NOT STAPLE**Billed Entity Name CLEVELAND CITY SCHOOL DISTRICT Contact Name DEDRA ROSSBilled Entity Number 129482 Contact Telephone Number 216-432-4619**Block 5: Certification**

12. I certify that I am authorized to submit this form on behalf of the above-named billed entity, that I have examined this request, and that, to the best of my knowledge, information, and belief, all statements of fact contained herein are true.
13. I understand 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 services receive an appropriate share of benefits from those services.
14. I will retain for 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 delivery of discount services (or after the date of transfer for equipment transfers), (1) any and all records that I rely upon to complete this form and (2) all documents necessary to demonstrate compliance with the statutory or regulatory requirements for the schools and libraries universal service support program. I recognize that I may be audited pursuant to this application and the applicant must produce such records as required by 47 C.F.R. § 54.516.

15. Signature



16. Date

1-8-2015

17. Printed name of authorized person

JOSEPH PODACH

18. Title or position of authorized person

DEPUTY CHIEF-TECHNOLOGY AND PROCUREMENT

19. Telephone number of authorized person

216-838-0414

20. Email address of authorized person

Joseph.Podach@clevelandmetroschools.org

21. Address of authorized person

1111 Superior Ave., E Suite1800, Cleveland, OH 44114

22. Name of Authorized Person's Employer

Cleveland Municipal School District

**FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT**

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Act Project (3060-0853), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0853.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

**A paper copy of this form, with an authorized signature in Block 5, Item 15 should be mailed to:**

**SLD Form 500  
P. O. Box 7026  
Lawrence, KS 66044-7026**

**If sent by express delivery services or U.S. Postal Service, Return Receipt Requested, the form should be mailed to:**

**SLD Forms  
ATTN: Form 500  
3833 Greenway Dr.  
Lawrence, KS 66046  
888-203-8100**

**Administrator's Decision on Implementation Extension Request**

February 19, 2015

Dedra Ross  
CLEVELAND CITY SCHOOL DISTRICT  
4966 Woodland Avenue, 3<sup>rd</sup> Fl.  
Cleveland, OH 44104

FCC Form 471 Application Number: 323210  
Funding Request Number(s): 865736

Your Correspondence Dated: January 9, 2015

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 implementation extension request. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision. If your request included more than one FRN, please note that for each FRN you may receive a separate determination letter.

Decision on Request: **Denied in full**

Explanation: Request received after the FCC deadline for Implementation Deadline Extension request which was 09/30/2014.

In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances.

**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
  - applicant and service provider names, if different than appellant
  - applicant BEN and service provider SPIN
  - <insert application or form number> as assigned by USAC
  - 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.
  5. Provide an authorized signature on your letter of appeal.

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](mailto: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: Mary N. Walker, International Business Machines Corporation