



www.eRateProgram.com

9666 Olive Blvd, Suite 215
St. Louis, MO 63132
314-282-3676
Fax: 314-395-5882

September 5, 2013

**Request for Review
TO INCREASE FRN 2744031**

CC Docket No. 02-6

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

To whom it may concern;

**Appellant Name: Richard Senturia, consultant for applicant.
Applicant: Trinity Lutheran School
Applicant BEN #: 60363
Applicant Form 471#: 1011029
FRN: 2744031 - Mediacom**

We filed for Trinity Lutheran School vendor Mediacom for the dollar amount that was on the bill we received. We did not know the dollar amount was incorrect when we received the RAL. Once Mediacom received the FCDL they contacted the school to let them know the monthly dollar amount that was requested was only the school's portion of the monthly bill. I filed an appeal to increase the dollar amount with USAC but since I did not make the change on the RAL it was denied. We were unaware of the issue until after the FCDL was issued. We respectfully request to have FRN 2744031 increased to \$750.00 a month.

Respectfully,

**Cricky Cirillo, for Richard Senturia, Consultant
9666 Olive Street Blvd, Suite 215
(314) 282 3675
rsenturia@erateprogram.com**



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2015-2016

July 15, 2015

Cricky Cirillo
eRate Program LLC
9666 Olive Blvd
Suite 215
Olivette, MO 63132

Re: Applicant Name: TRINITY LUTHERAN SCHOOL
Billed Entity Number: 60363
Form 471 Application Number: 1011029
Funding Request Number(s): 2744031
Your Correspondence Dated: June 30, 2015

After review of the information and documentation provided, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's funding commitment decision for the FCC Form 471 Application Number and funding requests number(s) FRN(s)) referenced above. This letter provides an explanation for USAC's decision. The date of this letter also begins the sixty (60) day time period for appealing this decision. If your Letter of Appeal included more than one FCC Form 471 Application Number, please note that you will receive a separate decision for each funding application.

Funding Request Number(s): 2744031
Decision on Appeal: **Denied**
Explanation:

- During appeal review of your FCC Form 471# 1011029 you requested to increase FRN 2744031 from \$375.00 to \$750.00. Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms until a Funding Commitment Decision Letter (FCDL) is issued. In your appeal, you did not demonstrate that USAC's determination was incorrect. Consequently, your appeal is denied.
- Your appeal requests additional funds that were not included in the FCC Form 471 that you are appealing. FCC rules require that funding requests must be submitted via an FCC Form 471. See 47 C.F.R. sec. 54.504(a). Considerations for funding requests depend on the date the FCC Form 471 is received and the

amount of funds available if it is received after the close of the filing window. *See* 47 C.F.R. sec. 54.507(f). The FCC directed USAC to allow applicants to amend their forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error. *See* Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, FCC 11-60 para. 5 (rel. April 14, 2011). Additional correctable errors can be found in the FCC Order DA 10-2354. *See* Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ann Arbor Public Schools, Ann Arbor, Michigan, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-542873, et al., CC Docket No. 02-6, Order, DA 10-2354 para. 2 (rel. December 16, 2010).

- The FCC's Bishop Perry Order directed USAC "to provide all E-rate applicants with an opportunity to correct ministerial and clerical errors on their FCC Form 470 or FCC Form 471, and an additional opportunity to file the required certifications" without posting new FCC Forms 470 and 471. *See* Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, New Orleans, Louisiana, et al., Schools and Libraries Universal Service Mechanism, File Nos. SLD-487170, et al., CC Docket No. 02-6, Order, 21 FCC Rcd 5316-5317, FCC 06-54 para. 23 (May 19, 2006) (Bishop Perry Order). As a result, USAC sends an applicant a Receipt Acknowledgement Letter (RAL) when the FCC Form 471 has been successfully data entered and provides the applicant with an opportunity to make allowable corrections to its FCC Form 471. *See* Ministerial & Clerical Errors posted in the Reference Area of the SLD section of the USAC website. Per the FCC's directive, applicants should be allowed to amend their forms to correct clerical and ministerial errors until a Funding Commitment Decision Letter (FCDL) is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error. *See* Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, FCC 11-60 para. 5 (rel. April 14, 2011). Additional correctable errors can be found in the FCC Order DA 10-2354. *See* Requests for Waiver and Review of Decisions of the Universal Service Administrator by Ann Arbor Public Schools, Ann Arbor, Michigan, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-542873, et al., CC Docket No. 02-6, Order, DA 10-2354 para. 2 (rel. December 16, 2010). An applicant's request to remove entities from its application, when such removal would raise the average discount percentage for the relevant funding request above the funding threshold for that year, is not justifiable as a ministerial or clerical error. *See* Request for Waiver and Review of Decisions of the Universal Service Administrator by Alexander County School District, Taylorsville, North Carolina, et al., Schools and Libraries Universal Service Support Mechanism, File No. SLD-827833 et al., CC Docket No. 02-6, Order, DA 13-1383 para. 2 (rel. June 14, 2013).

If you wish to appeal this decision, you may file an appeal pursuant to 47 C.F.R. Part 54, Subpart I. Detailed instructions for filing appeals are available at:
<http://www.usac.org/sl/about/program-integrity/appeals.aspx>.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company



Administrator's Appeal Acknowledgement Letter
(Funding Year 2015: 07/01/2015-06/30/2016)

June 30, 2015

Cricky Cirillo
eRate Program LLC
9666 Olive Blvd
St. Louis, MO 63132

Subject: Trinity Lutheran School

Cricky Cirillo,

Universal Service Administrative Company has received your correspondence dated June 30, 2015, on June 30, 2015 regarding the FY2015 funding decision of your FCC Form 471 Application Number(s) 1011029 – FRN2744031 respectively.

These are the steps that will now follow:

1. We will review your correspondence carefully to identify the specific issue(s) it raises.
2. We will consult the Program Integrity Assurance (PIA) records and all supporting documentation for the application. Our goal is to determine whether the program rules were administered appropriately in processing your application.
3. Once the review process is completed we will respond in writing and state whether your appeal is approved, denied or approved in part. A Revised Funding Commitment Decision Letter will follow for any approved appeal resulting in additional discounts for your application. Funds have been set aside to implement funding decisions for appeals approved by the USAC and/or the Federal Communications Commission.

We will perform an in-depth review of your appeal. Our goal is to respond to you as promptly as possible. We thank you in advance for your patience as we handle your appeal with the care and attention it deserves.

Universal Service Administrative Company



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Fax

To:	USAC	From:	Cricky Cirillo
Fax:	973-599-6542	Fax:	314-395-5882
Phone:	N/A	Pages:	6
Subject:	FCDL APPEAL	Date:	June 30, 2015

Hello USAC,

I am writing a Letter of Appeal for Trinity Lutheran School # 1011029. If you need to reach me you can call at 314-282-3675, email me at cricky@erateprogram.com, or fax me at 314-395-5882.

Thank you
Cricky

June 30, 2015

LETTER of APPEAL

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

To whom it may concern;

Appellant Name: Cricky Cirillo, consultant for applicant.
Applicant: Trinity Lutheran School
Applicant BEN #: 60363
Applicant Form 471 #: 1011029

We recently received the FCDL for Application Number 1011029. When we received a copy of the bill it said the monthly payment was \$375.00. Once it was approved the vendor noticed that we only requested the discounted portion not the whole bill. We would like to have FRN 2744031 approved at \$750.00 a month not the \$375.00 we requested.

Respectfully,

Cricky Cirillo, Consultant
Consulting Number 16048902
9666 Olive Blvd, Suite 215
Olivette, MO 63132
314-282-3675 direct line
314-395-5882 fax
cricky@erateprogram.com

FUNDING COMMITMENT REPORT
Billed Entity Name: TRINITY LUTHERAN SCHOOL
BEN: 60363
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1011029
Funding Request Number: 2744031
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 697480001280466
SPIN: 143022888
Service Provider Name: Mediacom Iowa LLC
Contract Number: MTM
Billing Account Number: # 8383640300006734
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$4,500.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$4,500.00
Discount Percentage Approved by the USAC: 60%
Funding Commitment Decision: \$2,700.00 - FRN approved as submitted

FCDL Date: 06/19/2015
Wave Number: 005
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2016
Consultant Name: Richard A Senturia
Consultant Registration Number (CRN): 16048902
Consultant Employer: ERateProgram, LLC

Cricky Cirillo

Subject: FW: Trinity Lutheran Schools-Davenport IA
Attachments: Trinity Lutheran Schools-1.pdf; Trinity Lutheran Schools-2.pdf

From: Selene Cohen-Zuyus [<mailto:scohen-zuyus@mediacomcc.com>]
Sent: Wednesday, June 24, 2015 10:15 AM
To: Richard Senturia
Cc: Nancy Tom; Robert Sorce
Subject: Trinity Lutheran Schools-Davenport IA

Richard,
Per our conversation earlier today..

Trinity Lutheran Schools-

Currently the full rate of service for Trinity Lutheran Schools is \$750.00
That is for two locations- 1122 W Central Park Ave, Davenport, IA
729 21st St, Bettendorf, IA

Last year FY2014 they received a 50% discount. It appears they sent you their portion of the full rate, instead of the full rate for you to file for FY2015.

FY2015 has been filed for \$ 375.00, that will need to be amended to \$ 750.00.

I have attached the invoice for each location that shows the full rate.

Please keep me posted.

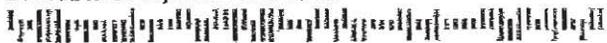
Thank you,

Selene Cohen-Zuyus
Billing Administrator
Mediacom Communications
Mediacom Park, NY
845-443-2655
845-698-4103 Fax
enterprisebilling@mediacomcc.com



MEDIACOM-ATTN:RICHARD LEWIS BTSC
 3737 WESTOWN PRKWAY W DES MOINES,IA 50266
 8522 4270 ZO RP 21 11222014 NNNNNYNN 01 000188 0001

TRINITY LUTHERAN SCHOOL *
 1122 W CENTRAL PARK AVE
 A/P
 DAVENPORT, IA 52804-1805



November 21, 2014

Statement of Service

Account number

8383 64 030 0006734

Trinity Lutheran School *

Contact us

Phone: 845-695-2655

Online at: EnterpriseBilling@mediacomcc.com



Summary *See the back for details*

Billed from 12/01/14 - 12/31/14

Previous balance	\$375.00
Payments received	-375.00
Leaf Charges	375.00
Total due by 12/21/14	\$375.00

Pin Number **2729**

Leaf Charges by Group

ENTERPRZ	\$375.00
Nov 21 Trinity Lutheran * 8383640370003173	187.50
Nov 21 Trinity Lutheran * 8383640370003181	187.50
Leaf Charge Total	\$375.00
Total Due	\$375.00

Total for Account 8383640370003181	\$187.50
ENTERPRZ SUBTOTAL 2 Account(s)	\$375.00
Total for Master Account: ENTERPRZ	
Total Accounts 2	\$375.00



Leaf Details by Group

ENTERPRZ
TRINITY LUTHERAN *
1122 W CENTRAL PARK AVE
DAVENPORT, IA 52804-1805
Account Number: 8383640370003173

Monthly Charges

Date	Description	Quantity	Amount
Dec 01 - Dec 31	Transparent LAN Service		187.50
Subtotal			\$187.50
Total for Account 8383640370003173			\$187.50

TRINITY LUTHERAN *
729 21ST ST
TRINITY LUTHERAN
BETTENDORF, IA 52722-5004
Account Number: 8383640370003181

Monthly Charges

Date	Description	Quantity	Amount
Dec 01 - Dec 31	Transparent LAN Service		187.50

TRANSACTION REPORT

JUN/30/2015/TUE 09:27 AM

\X(TX)

#	DATE	START T.	RECEIVER	COM.TIME	PAGE	TYPE/NOTE	FILE
1	JUN/30	09:26AM	19735996542	0:01:29	6	MEMORY OK	ECM 1537



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Thank you
 Cricky