



United States Department of the Interior

BUREAU OF INDIAN EDUCATION

KAIBETO BOARDING SCHOOL

EAST HIGHWAY 160/98

PO BOX 1420

KAIBETO, ARIZONA 86053



Letter of Appeal - Request for Review CC Docket No. 02-6

Attn: Marlene H. Dorch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Dr
Capitol Heights, MD 20743

Entity: Kaibeto Boarding School
BEN: 98672
School Contact Person: Phyllis Newell-Yazzie
School Contact Info: PO Box 746
Tuba City, AZ 86045
United States
FRN: 2327542
471 #: 855516

Service Provider Name: CamNet Inc
Service Provider SPIN: 143017447

Decision Document: *Administrator's Decision on Implementation Deadline Extension Request 6/18/2015*

Administrator's Decision on Invoice Deadline Extension Request

Explanation:

Current invoice deadline guidelines and procedures require that Invoice Deadline Extension requests be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension. The invoice receipt deadline is 120 days after the end of the service delivery date or 120 days after the date of the Form 486 Notification Letter, whichever is later. USAC denied your request for Invoice Deadline Extension because the request was not filed in a timely manner. Since USAC's decision was consistent with Invoice Deadline Extension guidelines, your appeal is denied.

Overview:

Over the past three years the Kaibeto Boarding School has been working

diligently towards procuring critical updates to our information technology systems through the E-rate process. All our paperwork and forms were filled out and submitted on time during the normal application process.

A major delay in the process was caused by the failure of the BIA to process the 10% purchase requisition in a timely fashion. In fact after almost 30 months, the school still does not have approval for the 10% requisition. See the timeline below.

The BIA's delay caused a cascade of paperwork and the need for filing extensions which hit the school at a particularly bad time. Due to major restructuring and changes in personnel including the loss of the principal, Erate point of contact and IT Coordinator, their IT Support personnel, the chain of communication was broken and the school unfortunately missed the crucial Invoice Extension Deadline date. The Invoice Extension Request was filed late for the very reason that the FRN is necessary; the state of our school's communication systems has deteriorated to the point where it interferes with daily business and our ability to meet USAC deadlines. In fact, the school's phone system is no longer functional, and this Erate funding had critical funds to upgrade the failing phone system. This double bind puts the school in an impossible situation and will most likely begin to effect educational outcomes.

Timeline:

The timeline below illustrates the initial efforts on behalf of our school to procure the 10% from the Bureau of Indian Education and the issues we encountered in the process:

- December 7, 2012 - Kyle Hemstreet (Bureau of Indian Education IT Manager) emailed all the required purchasing documents for the 10% to Miltina Haskie (Kaibeto Boarding School Business Manager) and Phyllis Yazzie (Kaibeto Boarding School Principal)
- January 18, 2013 - Miltina submitted the official requisition and all purchasing documents to Calvin Quimayousie (BIE Acquisitions)
- April 30, 2013 - After a follow up on the status, Miltina Haskie is asked to resubmit all purchasing documents to Calvin Quimayousie
- May – June, 2013 - Calvin Quimayousie retires
- June 4, 2013 - After a second follow up, Fern Becenti receives the same purchasing documents that had already been submitted twice previously to Calvin in January and April. This starts the process all over again.
- August 2013 - Kyle Hemstreet (BIE IT Manager) resigns from BIE
- August 2013 – September 2013 - Miltina Haskie continues to follow up with Fern Becenti regarding the 10% purchase order.
- September 2013 – October 2013 - Purchasing Blackout Dates at the Bureau of Indian Education.
- September 2014 – October 2014 – Purchasing Blackout Dates at the Bureau of Indian Education.

□ 2014-2015 School year, the school continued pushing the BIA to approve the purchase order for the 10% of Erate Yr 15

To date, no Purchase Order has been issued or denied by the Bureau of Indian Education and the status of the order is unknown. The above timeline emphasizes lack of follow through within the BIE after repeated attempts were made by the school to acquire the purchasing orders, as well as the changes in personnel that led to the tardiness of the invoice extension request.

Detailed Discussion:

You will see from the list below, which describes the deterioration and current state of our IT Systems, that we are motivated to complete this project:

□ Last school year, the main DNS/DHPC server started to fail and is now running those services on an outdated server from 2009.

□ This past fall their WLAN Controller failed beyond repair. The school does not have a functioning WLAN. The school has Laptops and iPads that the students were using on a daily basis before the WLAN went out.

□ This past winter the school's voice system began crashing and is now nonfunctioning. The Cisco VoIP system is at end of life, therefore KBS cannot get any replaceable parts or support from Cisco to revive the system. Currently, the school is using one phone connected to an analog line to service the entire school.

□ All of the school's Cisco Network Switches are at End of Life. The school does not have any available switches that can be used if they experience another loss.

□ The School now has only one working phone, which is passed around the school throughout the day to conduct business. We have reached a point where, without upgrades, the state of our communication system is dangerous for our student population and impeding their education. Kaibeto Boarding School is 36 miles outside of the closest town, Page, in the northeastern corner of Coconino County Arizona. It is an incredibly rural area but the school provides education to over two hundred students, all of whom are members of a federally recognized Native American tribe.

Summary & Review:

Since the beginning of this process, the information technology and telecommunication systems at Kaibeto Boarding School have deteriorated significantly and the need for these upgrades has become urgent. We believe that, with the increasing severity of our situation, the Bureau of Indian Education will now approve the 10% purchase order. If the Invoice Deadline Extension appeal is granted, we will continue to work tirelessly to complete this project. The Kaibeto School is depending on Erate funding to repair the systems and provide adequate communication to and from our rural setting. Below describes the state of the school's budget and the importance of the Erate funding:

□ The school does not have the available funding within this school year's budget to replace any of these systems at full price.

□ It will take the school at least 2 years to budget the amount of money required to replace the Phone system, WLAN, and servers if paying at 100% the cost and if they do not experience any more IT system failures.

We serve an impoverished community and provide a dormitory for students that live beyond Kaibeto, many of whom do not have running water or electricity. The majority of these students depend on the school and its IT systems for access to the internet and as Internet access becomes increasingly vital to our ability to educate, with computer based mandatory state-wide testing, the upgrades are imperative. The school has put forth substantial effort toward procuring funding through Erate and the denial of this funding would be a detrimental set-back for the community. The institution and the populations that it serves should not be forced to suffer this technological set-back because of bureaucratic personnel changes and technology failures that the project aimed to fix in the first place. I urge you to reconsider the invoice deadline request decision and approve our appeal.

Please call me with any questions.

Sincerely,


Phyllis Yazzie, Principal

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