



Received & Inspected

SEP 01 2015

FCC Mail Room

Date August 27, 2015

Letter of Appeal

USAC

2000 L Street, NW, Suite 200

Washington, DC 20036

EXHIBIT COPY SENT TO L

Re: Letter of Appeal
WC Docket No. 06-122
NetWolves Network Services LLC (f.k.a. Norstan Network Services)
Form: 499Q
Filer ID 815028

We received your letter regarding "May 2015 FCC Form 499-Q Revision Rejection" dated August 12, 2015 (copy enclosed).

We made a typographical error when the 499-Q was filed in May '15 which did not come to our attention until we received USAC's invoice UBD10000782635 dated 07/22/15. The 07/22/15 invoice was much lower than our historical billings from USAC. Once we received your invoice we immediately filed a revision to correct the error. Both the original and revised Form 499-Q are enclosed as well. The error is in box 119b and box 120b. The numbers were erroneously reversed.

While I understand we missed the 45 day form revision window please note the error was not discovered until we received the July 22, 2015 invoice which was on July 27, 2015.

We are requesting that USAC accepts are revised filing and that the September invoice be adjusted to reflect the revised numbers and that the true up for the July 22, 2015 and August 21, 2015 invoices be included as well.

If you should have any further questions please feel free to contact me.

Regards,

Chris Denny
Senior Accountant
(813)579-3224
chris.denny@netwolves.com

No. of Copies rec'd 0
List ABCDE



Universal Service Administrative Company

August 12, 2015

Attn: Chris Denny
Norstan Network Services, Inc.
4710 Eisenhower Blvd
Suite E8
Tampa, FL 33634

Form 499 Filer ID: 815028

RE: May 2015 FCC Form 499-Q Revision Rejection

Federal Communications Commission (FCC) regulations require carriers to file an FCC Form 499-A annually and an FCC Form 499-Q quarterly and require the Universal Service Administrative Company (USAC) to bill contributors based on reported revenues. See generally 47 C.F.R. Part 54. The May 2015 FCC Form 499-Q was due Friday, May 01, 2015, with revisions due by Monday, June 15, 2015 (45 days later). This 45 day form revision window is clearly noted in the instructions for the FCC Form 499 Q, is discussed in a document entitled "Helpful Hints" that was included with the form, and is posted on USAC's website www.universalservice.org. In addition, questions concerning forms and revisions can be addressed to USAC via email at Form499@universalservice.org.

Because USAC received the May 2015 FCC Form 499-Q submitted by the above-referenced Form 499 Filer ID 815028 Norstan Network Services, Inc. after the due date and outside of the 45-day revision window, the form was untimely and will not be processed.

If this submission was intended to revise revenue reported on a previously filed original Form 499-Q, please note USAC has relied upon the revenue previously projected by you for the purposes of calculating your universal service charges for July, August and September 2015. If you failed to timely file an original Form 499-Q, please note USAC has relied on revenue previously reported by you for the purpose of calculating your universal service charges for July, August and September 2015.

When a carrier fails to file an FCC Form 499 by the due date, in order to calculate universal service charges for the relevant period, FCC regulations require USAC to estimate that carrier's revenue based upon previously reported revenue information.

Please note that although you missed the revision window for submission of the Form 499-Q, the annual/quarterly (A/Q) true-up will provide a remedy. USAC's 2016 A/Q true-up will reconcile and revise contributor's account accordingly. The 2016 Form 499 A, reporting annual 2015 revenue, has a due date of April 1, 2016. Upon receipt of contributor's 2016 Form 499-A, USAC will perform the A/Q true-up and post appropriate credits or adjustments to your account.

If you wish to appeal this decision with USAC, your appeal must be postmarked no later than 60 days after the date of USAC's rejection letter. Appeals postmarked after 60 days from the date of this letter will be automatically dismissed.

In the event that you choose to appeal the decision, you should follow these guidelines:

- Write a "Letter of Appeal to USAC" explaining why you disagree with this Form 499-Q rejection letter and identify the outcome that you request.
- Be sure to refer to WC Docket No. 06-122 on all communication with the FCC.
- The appeal must identify the "Legal Reporting Name" and "Filer 499 ID".
- Provide necessary contact information. Please list the name, address, telephone number, fax number, and e-mail address (if available) of the person who can most readily discuss this appeal with USAC.
- Explain the appeal to the USAC. Please provide documentation to support your appeal.
- Attach a photocopy of this Revised Form 499-Q Rejection decision that you are appealing.

FCC Form 499-Q Telecommunications Reporting Worksheet

Quarterly Filing for Universal Service Contributors

> Please read instructions before completing <

Approval by OMB
3060-0855

Block 1: Contributor Identification Information	101	Filer 499 ID	815028
102 Legal name of reporting entity	Norstan Network Services, Inc.		
103 Filer's IRS employer identification number	41-1705072		
104 Name telecommunications provider is doing business as	Netwolves Network Services, Inc.		
105 Affiliated Filers Name/Holding Company Name <small>[All affiliated companies should show same name here. In most cases, the Affiliated Filers Name will be the holding company name.]</small>	Check if filer has no affiliates: <input type="checkbox"/> NORSTAN NETWORK SERVICES INC		
105.1 Affiliated Filers Name/Holding Company Name IRS employer identification number	41-1705072		
106 Filer's FCC Registration Number (FRN)	0006-9558-35		
107 Complete mailing address of reporting entity's corporate headquarters	4710 Eisenhower Blvd Suite E8 , Tampa FL 33634-6336 United States		

Block 2: Contact Information			
108 Person who completed this worksheet	First Chris	MI	Last Denny
109 Telephone number of this person	(813) - 579-3224 ext		
110 Fax number of this person	(813) - 882-0209		
111 Email of this person	chris.denny@netwolves.com		
112 Billing address and billing contact person: <small>[Bills for Universal Service contributions will be sent to this address.]</small>	Jon Russell 4710 Eisenhower Blvd Suite E8 Tampa FL 33634 6336 United States jonathan.russell@netwolves.com 813 579-3217 813 882-0209		

Block 3: Contributor Historical and Projected Revenue Information			
113 Indicate which quarterly filing this represents	Filing due	Historical revenues (lines 115-118) for	Projected revenues (lines 119-120) for
<input type="checkbox"/>	November 1, 2014	July 1 - September 30, 2014	January 1 - March 31, 2015
<input type="checkbox"/>	February 1, 2015	October 1 - December 31, 2014	April 1 - June 30, 2015
<input checked="" type="checkbox"/>	May 1, 2015	January 1 - March 31, 2015	July 1 - September 30, 2015
<input type="checkbox"/>	August 1, 2015	April 1 - June 30, 2015	October 1 - December 31, 2015

114 Check if using safe harbor to allocate interstate/intrastate revenues for each of the following (as applicable):
 Cellular & broadband PCS: Paging: Analog SMR: Interconnected VoIP:

Historical billed revenues with no allowance or deductions for uncollectibles. See Instructions.	Total Revenues (a)	Interstate Revenues (b)	International Revenues (c)
115 Telecommunications provided to other universal service contributors for resale as telecommunications or as or as interconnected VoIP.	\$0.00	\$0.00	\$0.00
116 End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	\$2,154,347.30	\$2,021,995.82	\$132,351.48
117 All other goods and services	\$5,923,751.25	Column (b) and (c) not requested	
118 Gross-billed revenues from all sources [sum of above]	\$8,078,098.55	for Lines 117 and 118	
119 Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		\$2,000,000.00	\$2,000,000.00
120 Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		\$10,000.00	\$10,000.00

Block 4: CERTIFICATION: to be signed by an officer of the reporting entity

121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122 Signature			
123 Printed name of officer	First Peter	MI	Last Castle
124 Position with reporting entity	President		
125 Email of officer (Required if available)	peter.castle@netwolves.com		
126 Date	5/1/2015		
127 This filing is:	<input checked="" type="checkbox"/> Original filing <input type="checkbox"/> Revised filing [revisions due within 45 days of original filing deadline]		

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036
 For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info: (888) 641-8722 or via e-mail: Form499@universalservice.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-Q Telecommunications Reporting Worksheet

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122 Signature

123 Printed name of officer

124 Position with reporting entity

125 Email of officer (Required if available)

126 Date

127 This filing is: Original filing Revised filing [revisions due within 45 days of original filing deadline]

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