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September 14, 2015

Request for Review

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: Cricky Cirillo, consultant for applicant.
Applicant: St. Alphonsus School
Applicant BEN #: 16401
Applicant Form 471 #: 1007724**

When we received the FCDL for Application Number 1007724 we realized that USAC made an error and approved FRN 2735997 for \$119.95 a year not \$119.95 a month. When the Form 471 was filed we entered \$119.95 in the monthly eligible cost, but did not double check to make sure USAC's internal calculator multiplied the \$119.95 times 12 months. We filed an appeal with USAC and they denied it. We respectfully request to have FRN 2735997 be approved for what was requested on the Form 471 of \$119.95 a month not \$119.95 a year.

Respectfully,

**Cricky Cirillo, for Richard Senturia, 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: ST ALPHONSUS SCHOOL
BEN: 16401
Funding Year: 2015

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

FCC Form 471 Application Number: 1007724
Funding Request Number: 2735997
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 709910001245667
SPIN: 143008427
Service Provider Name: Armstrong Cable Services
Contract Number: MTM
Billing Account Number: 021125401
Service Start Date: 07/01/2015
Service End Date: 07/30/2015
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 1
Annual Pre-discount Amount for Eligible Recurring Charges: \$119.95
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$119.95
Discount Percentage Approved by the USAC: 40%
Funding Commitment Decision: \$47.98 - ERN approved as submitted

FCDL Date: 05/21/2015
Wave Number: 001
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

*119.95/mo
NOT
year
file appeal*



Type of Service: CELLULAR

If you have not already sent us a bill, please attach a copy of a monthly bill from Oct., Nov. or Dec. 2014, whichever is highest. Please submit all pages except those containing only call detail. If your cell phone bill is in an individual name, not in the school's name, it is not E-Rate eligible.

Are you keeping your current Service Provider? Yes: No:

If this is a New Service Provider, check here:

Name of Service Provider:			
Your Account #:		Total # of phones:	
Narrative Description:			
Additional Information:	Did you sign a new contract for service beginning July 1, 2015? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please attach		
Date Contract Signed:		Term of Contract or Expiration Date:	
Actual Monthly Service Cost:	\$	Installation Cost:	\$

Type of Service: INTERNET ACCESS

Do you have an Internet Safety Plan or revised plan issued after 7/1/2013? Yes No

If No, please contact us immediately! You must have an approved Internet Safety Plan in order to receive funding.

If you have not already sent us a bill, please attach a copy of one monthly bill from Oct., Nov. or Dec. 2014, whichever is highest. Please submit all pages except those containing only call detail.

Are you keeping your current Service Provider? Yes: No:

If this is a New Service Provider, check here:

Name of Service Provider:	Armstrong		
Account #:	0211254-01		
Type of Connection:	<input type="checkbox"/> BPL <input type="checkbox"/> Cable Modem <input type="checkbox"/> DSL <input type="checkbox"/> Fiber Optic <input type="checkbox"/> T-1 <input type="checkbox"/> Other, describe:		
Additional Information:	Did you sign a new contract beginning July 1, 2015? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, please attach		
Date Contract Signed:		Term of Contract or Expiration Date:	
Actual Monthly Service Cost:	\$ 119.95	Installation Cost:	\$

Please attach any additional information. Make a copy for your file and return to erp@erateprogram.com or Fax to 314-395-5882

FEDERAL RULES REQUIRE THAT ALL E-RATE CORRESPONDENCE, WORKSHEETS, AND DOCUMENTATION BE RETAINED FOR 10 YEARS

eRateProgram, LLC | 9666 Olive Street Blvd | St. Louis MO 63132 | 314-282-3676 | erateprogram.com

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 709910001245667

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143008427

SPIN Name: Armstrong Cable Services

Billing Account Number: 021125401

Purchase Type: MONTHLY

When will the services start? 07/01/2015

When will the services end? 07/30/2015

Previous FRN Number:

Narrative:

Armstrong

Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No

Type of restriction:

Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Download Speed	Burst Bandwidth? Burst Speed	Last Mile?	Firewall? WAN?	Monthly Cost Eligible Ineligible	One Time Cost Eligible Ineligible	Extended Cost
1	Digital Transmission Service	Cable Modem	Internet	1	5Mbps	30Mbps	No	No	Yes No	\$119.95 \$0.00	\$0.00 \$0.00	\$119.95

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$47.98



Universal Service Administrative Company
Schools & Libraries Division

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

August 28, 2015

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

Re: Applicant Name: ST ALPHONSUS SCHOOL
Billed Entity Number: 16401
Form 471 Application Number: 1007724
Funding Request Number(s): 2735997
Your Correspondence Dated: June 01, 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): 2735997
Decision on Appeal: **Denied**
Explanation:

- During appeal review of your FCC Form 471 application number 1007724 you requested to increase the amount of funds approved under FRN 2735997. Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms (including adding a funding request) until an Funding Commitment Decision Letter (FCDL) is issued. Increases in funding requests cannot be submitted through the appeals process and after the issuance of the FCDL. Consequently, USAC denies your appeal.
- 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 Red 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