



9666 Olive Street Blvd., Suite 215  
St. Louis, MO 63132  
CRN: 16048902  
(314) 282-3676 (o)  
(314) 395-5882 (f)  
[www.erateprogram.com](http://www.erateprogram.com)

**December 7, 2015**

## **Request to Approve Funds**

**CC Docket No. 02-6**

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

**To whom it may concern;**

**Appellant Name: Cricky Cirillo, consultant for applicant.  
Applicant: St. Paul School  
Applicant BEN #: 10216  
Applicant Form 471 #: 1014550**

**We filed for St. Paul School BEN 10216 Application Number 1014550. When we received the FCDL we noticed that FRN 2753155 was denied because of "duplicative services". The appeal was filed after the deadline because St. Paul is one of the New York Regional schools that we were appealing to add the Region. We filed the appeal hoping USAC would waive the deadline. They denied the appeal. We respectfully request that the FCC waive the deadline so St. Paul can get E-Rate disbursement for their services with FRN 2753155**

**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](mailto:cricky@erateprogram.com)**



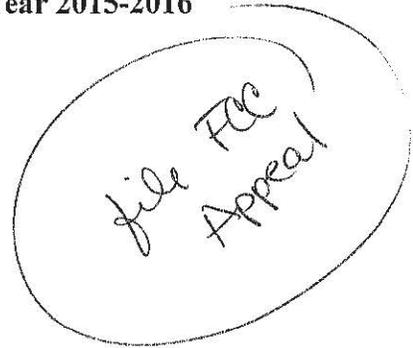
**Universal Service Administrative Company**  
Schools & Libraries Division

---

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

October 16, 2015

Cricky Cirillo  
ERATE Program LLC  
9666 Olive Blvd  
Suite 215  
St. Louis, MO 63132



Re: Applicant Name: ST PAUL SCHOOL  
Billed Entity Number: 10216  
Form 471 Application Number: 1014550  
Funding Request Number(s): 2753155  
Your Correspondence Dated: August 27, 2015

The Universal Service Administrative Company (USAC) received your request for a waiver of the sixty (60) day deadline to file appeals for Funding Year 2015 of the E-rate program.

Federal Communications Commission (FCC) rules do not permit USAC to consider requests for waivers. If you believe there is a basis for further examination of your request, you may file a waiver request with the FCC. Detailed instructions for filing waiver requests with the FCC are available at: <http://www.usac.org/sl/about/program-integrity/appeals.aspx>.

Schools and Libraries Division  
Universal Service Administrative Company

FUNDING COMMITMENT REPORT  
Billed Entity Name: ST PAUL SCHOOL  
BEN: 10216  
Funding Year: 2015

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

FCC Form 471 Application Number: 1014550  
Funding Request Number: 2753155  
Funding Status: Not Funded  
Service Type: Internet Access  
FCC Form 470 Application Number: 976120001245367  
SPIN: 143024572

Service Provider Name: Network Outsource, Inc

Contract Number: MTM

Billing Account Number: na

Service Start Date: 07/01/2015

Service End Date: 06/28/2016

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: \$5,400.00

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00

Pre-discount Amount: \$5,400.00

Discount Percentage Approved by the USAC: 90%

Funding Commitment Decision: \$0.00 - Duplicate FRN

Funding Commitment Decision Explanation: This FRN is denied because the funding request is duplicative of a current year's FRN. Program rules prohibit USAC from funding the same products and services, to the same location in the same funding year.

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

**FY 2015 E-rate Application Information Request**

April 29, 2015

Contact Name: Richard A Senturia  
Applicant Name: ST PAUL SCHOOL  
FCC Form 471 Application Number(s):1014550

Dear Applicant:

The Program Integrity Assurance (PIA) team is in the process of reviewing your Funding Year 2015 FCC Form 471 Applications for E-rate discounts to ensure that they are in compliance with the rules of the Universal Service Program.

**I. Duplicate Services**

*Issue*

We have completed our review of your Funding Year **2015** FCC Form 471 application **1014550** and determined that FRN **2753155** Line Item **#1** will be denied because it is requesting the same service as FRN **2753158** Line Item **#1**. Duplicative services are defined as services that deliver the same functionality to the same population in the same location during the same period of time.

For additional information on duplicative services, see:  
<http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx>.

*If you do not agree with the review decision*

If the entire FRN should not be denied and you have alternative information to support your position, please provide the supporting documentation.

 We do not agree with this review decision. FRN 2753158 may be requesting partial duplicate services of FRN 1014550. We therefore request the cancellation of FRN 2753158.

*Response Reminders*

Please email or fax any information that you wish to provide to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Carl Parker  
Program Integrity Assurance

# NETWORK OUTSOURCE

BUSINESS AND EDUCATIONAL TECHNOLOGY SOLUTIONS  
135 DENTON AVE NEW HYDE PARK, NY 11040  
(516) 488-5888

## Invoice

Date	Invoice #
7/1/2014	39455

Bill To
St. Paul Church 114 E. 118th Street New York, NY 10035

PAID  
OCT 24 2014

BY: *[Signature]*

P.O. No.	Terms	Project
	Due on receipt	

Description	Qty	Rate	Amount
Annual Internet Access FRN: 2648348 10% School Portion July 2014 - June 2015		540.00	540.00
School # <u>5095</u> Region # <u>8605</u> Total Invoices # _____ Initials: <u>[Signature]</u> Date: <u>9/20/14</u> Principal: <u>[Signature]</u> Date: <u>9/20/14</u> RAC: <u>[Signature]</u> Date: <u>9/24/14</u> RBM: <u>TS: RQ</u> Date: <u>10/11/14</u> Transmitted: <u>[Signature]</u> Date: _____			
Total			\$540.00

No Dec 2014 invoice This is for 1 year

\* \$540.00/yr is the schools portion

\* \$5400.00/yr is the total bill