



9666 Olive Street Blvd., Suite 215
St. Louis, MO 63132
CRN: 16048902
(314) 282-3676 (o)
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www.erateprogram.com

December 7, 2015

Request to Approve Funds

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. Paul Lutheran School
Applicant BEN #: 80047
Applicant Form 471 #: 1013728**

We filed for St. Paul Lutheran School BEN 80047 Application Number 1013728. When we received the FCDL we noticed that FRN 2750963 was filed for only the discounted portion of the monthly bill not 100% of the bill. We filed an appeal with USAC and it was denied. We respectfully request that the FCC allow the increase in the monthly dollar amount to reflect 100% of the bill not the discounted portion of the bill.

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**



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

October 29, 2015

Cricky Cirillo
St. Paul Lutheran School
9666 Olive Blvd
Suite 215
St. Louis, MO 63132

Re: Applicant Name: ST PAUL LUTHERAN SCHOOL
Billed Entity Number: 80047
Form 471 Application Number: 1013728
Funding Request Number(s): 2750966, 2750963
Your Correspondence Dated: August 10, 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): 2750966
Decision on Appeal: **Approved**
Explanation:

- Your appeal has brought forward persuasive information that the funding request cited above should be approved for funding for \$32.44 per month.

Funding Request Number(s): 2750963
Decision on Appeal: **Denied**
Explanation:

- During appeal review of your FCC Form 471 #1013728 you requested that a new funding increase be added to your application. Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms (including adding a funding increase request) until a Funding

Commitment Decision Letter (FCDL) is issued. Consequently, your appeal is denied since your request is for a funding increase after the FCDL was issued.

- 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).*

Since the Administrator's Decision on Appeal modifies funding for your application, USAC will issue a Revised Funding Commitment Decision Letter (RFCDL) to you and to each service provider that will provide the services approved for discounts in this letter. The RFCDL will inform you of the precise dollar value of your approved funding request(s). As you await the RFCDL, you may share this Administrator's Decision on Appeal with the relevant service provider(s).

If the original FCDL approved funding in part for the services covered by this appeal, the 120 day deadline for filing FCC Forms 486 is determined based on the date of the original FCDL that approved funding for the request(s). However, if the original FCDL denied funding for the services covered by this appeal, FCC Forms 486 cannot be filed until you have received your RFCDL.

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

FUNDING COMMITMENT REPORT
Billed Entity Name: ST PAUL LUTHERAN SCHOOL
BEN: 80047
Funding Year: 2015

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

FCC Form 471 Application Number: 1013728
Funding Request Number: 2750963
Funding Status: Funded
Service Type: Voice Services
FCC Form 470 Application Number: 190240001248898
SPIN: 143004824
Service Provider Name: BellSouth Telecommunications, LLC
Contract Number: MTM
Billing Account Number: 50494717734680462
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: \$558.12
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$558.12
Discount Percentage Approved by the USAC: 70%
Funding Commitment Decision: \$390.68 - FRN approved as submitted

FCDL Date: 07/17/2015
Wave Number: 008
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

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Voice Service	Interconnected VoIP	Voice	4		No	No	No No	\$46.51 \$0.00	\$0.00 \$0.00	\$558.12

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$390.68

Monthly Charges

Total Charges:	\$46.51 (monthly)	\$259.45
Ineligible charges:	- \$0.00 (monthly)	
Eligible monthly pre-discount amount:	\$46.51	\$259.45
Total number of months of service:	x 12	
Total annual recurring charges:	\$558.12	\$3113.40

Total One-time Charges

Total Charges:	\$0.00
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$0.00

Total Requested Amount

Total eligible charges:	\$558.12	\$3113.40
Discount Rate:	x 70%	
Funding Commitment Request:	\$390.68	\$2179.38

ATT Long Distance - 2750963

ATT Long Distance - 2750966

Key Information

Duplicate Funding Request Number:
Service Type: VOICE SERVICES
Form470 Number: 190240001248898
Exempt470 Reason:
SPIN (Service Provider Identification Number): 143004066
SPIN Name: BellSouth Long Distance, Inc. dba AT&T Long Distance Service
Billing Account Number: 50494717734680462
Purchase Type: MONTHLY
When will the services start? 07/01/2015
When will the services end? 06/30/2016

Narrative:
 ATT Long Distance
Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No
Type of restriction:
Restriction Citation:

long distance SPIN



ST PAUL LUTHERAN
ATTN: TREASURER
2624 BURGUNDY ST
NEW ORLEANS LA 70117-7304

Page 1 of 3
Account Number 504 947-1773 468 0462
Billing Date Dec 26, 2014

WebSite att.com

Bill-At-A-Glance

Previous Bill	334.17 CR
Payment	.00
Adjustments	.00
Balance	334.17 CR
Current Charges	48.51
Balance	\$287.66 CR
Payment is Not Required	

Plans and Services

Promotions and Discounts

Item	No.	Description	Quantity	Amount
1.		Benefit under Universal Service Fund for FRN2608891 TAC EE2741DDW.		226.77 CR

Monthly Service - Dec 25 thru Jan 25

Item	No.	Description	Quantity	Amount
2.		Complete Choice @ 3 Lines Business Line 3Way Calling with Transfer Call Forwarding Call Waiting Call Forwarding Busy Line Call Forwarding Don't Answer Hunting/Rollover Service Message Waiting-Stubber Dialtone Personalized Ring @ Repeat Dialing Call Return Call Blocking Enhanced Caller ID Anonymous Call Blocking Caller-ID Name-Number Delivery Anonymous Call Blocking Star 98 to Voice Mail	1	183.00
3.		Complete Choice @ Mntce 3 Lines Equipment Maintenance Plan Inside Wires Protection	1	8.50
4.		Complete Choice @ Total Messaging Voice Mail Service	1	9.00
Total Monthly Service				210.50

local

local

local

Surcharges and Other Fees

Item	No.	Description	Quantity	Amount
5.		LA Universal Service Fee	3	4.35
6.		Federal Subscriber Line Charge	3	21.27
7.		Federal Universal Svc Fee-Mult	3	4.02
Total Surcharges and Other Fees				29.67

local

Government Fees and Taxes

Item	No.	Description	Quantity	Amount
8.		Federal Excise Tax		6.56
9.		LA - State/Local Tax		6.72
10.		Emergency 911 Service		9.00

local

Local Services provided by AT&T Louisiana.

\$259.45

Billing Summary

Questions?	Visit att.com	Page	Amount
Plans and Services		1	38.83
1 877 438-0041 PIN: 1161			
Repair Service:			
1 866 620-0800			
AT&T Long Distance Service		2	7.68
1 877 438-0041			
Total Current Charges			46.51

News You Can Use Summary

PREVENT DISCONNECT CARRIER INFORMATION
DO NOT CALL EXPRESS TICKETING
See "News You Can Use" for additional information.

Return labels portion with your check in the enclosed envelope.

Payment is Not Required Balance \$287.66 CR



Billing Date Dec 26, 2014

Account Number 504 947-1773 468 0462

ST PAUL LUTHERAN
ATTN: TREASURER
2624 BURGUNDY ST
NEW ORLEANS LA 70117-7304

AT&T
P.O. BOX 105262
ATLANTA, GA 30348-5262

3900 50494717734689 6000024999999 046020000000033417000000000000



ST PAUL LUTHERAN
ATTN TREASURER
2624 BURGUNDY ST
NEW ORLEANS LA 70117-7304

Page 2 of 3
Account Number 504 947-1773 488 0482
Billing Date Dec 26, 2014

Plans and Services

Government Fees and Taxes - Continued

No.	Description	Quantity	Amount
1.	Telecommunications for the Deaf Fund	1	.15
Total Government Fees and Taxes			19.43
Total Plans and Services			38.83

AT&T Long Distance Service

Monthly Service

Type of Service	Period	Amount
2. Bus. Prof. Rate Plan Monthly Fee	12/09-01/08	17.00
3. 11-13 E-Rate Discount		22.95CR
4. 12-08 Federal Universal Service Fee Credit		.06CR
5. 3-Year Term Plan IntraState Discount-14%	11/09-12/08	1.36CR
6. 3-Year Term Plan InterState Discount-14%	11/09-12/08	.39CR
Total Charges for 504 947-1773		
Total Monthly Service		

Call Charges

Usage Summary	Minutes	Amount
Domestic		
504 947-1773	65.6	12.48
Total Usage Summary	65.6	12.48

No.	Date	Time	Place Called	Number	Code	Min	Amount
Itemized Calls							
7.	11-10	146P	TALLAHASSEE FL	850 345-1214	D	0.5 G	.10
8.	11-11	1244P	HAMMOND LA	985 345-5104	D	0.5 G	.10
9.	11-11	146P	HAMMOND LA	985 345-5104	D	3.6 G	.68
10.	11-14	312P	DALLAS TX	214 553-0637	D	8.8 G	1.67
11.	11-15	301P	MANDEVILLE LA	985 789-0766	D	0.8 G	.15
12.	11-17	920A	BATONROUGE LA	225 952-9430	D	1.5 G	.29
13.	11-17	922A	MARKSVILLE LA	318 587-0303	D	5.0 G	.95
14.	11-17	929A	MARKSVILLE LA	318 587-0303	D	4.0 G	.76
15.	11-18	1213P	BATONROUGE LA	225 952-9430	D	1.7 G	.32
16.	11-18	122P	MARKSVILLE LA	318 587-0303	D	7.2 G	1.37
17.	11-21	1112A	ROSELLE IL	847 702-8008	D	4.1 G	.78
18.	11-21	1122A	PEARLRIVER LA	985 663-1451	D	8.3 G	1.58
19.	12-03	834A	HAMMOND LA	985 345-5104	D	0.5 G	.10
20.	12-03	836A	HAMMOND LA	985 345-5104	D	13.3 G	2.53
21.	12-03	1008A	HAMMOND LA	985 345-5104	D	1.7 G	.32
22.	12-03	1037A	HAMMOND LA	985 345-5104	D	1.7 G	.32
23.	12-03	127P	MANDEVILLE LA	985 626-8980	D	1.3 G	.25

Call Charges - Continued

Item	No.	Date	Time	Place Called	Number	Code	Min	Amount
	24.	12-04	107P	SARANTONID TX	210 537-8485	D	1.1 G	.21
Total Itemized Calls								12.48
Total Charges for 504 947-1773								12.48
Total Call Charges								12.48

Surcharges and Other Fees

25. Federal Universal Service Fee	2.04
26. Federal Regulatory Fee	.28
27. LA Universal Service Fee	.51
28. Federal Regulatory Fee Adjustment	.01CR
29. LA Universal Service Fee Credit	.04CR
Total Surcharges and Other Fees	2.78

Government Fees and Taxes

30. LA - State/Local Tax	.18
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G = State Tax Only

Key to Calling Codes
D Day

Total AT&T Long Distance Service 7.58

News You Can Use

PREVENT DISCONNECT
Thank you for being a valued customer. Please be aware that all charges must be paid each month to keep your account current and prevent collection activities. We are required to inform you that certain charges MUST be paid in order to prevent interruption of basic local service. These charges are already included in the Total Amount Due and are \$0.00. Also, neglecting to pay for remaining charges may result in interruption or removal of these remaining services or further collection action.

CARRIER INFORMATION
Our records indicate that you have selected AT&T Long Distance Service or a company that resells their services as your primary local toll carrier and AT&T Long Distance Service or a company that resells their services as your primary long distance carrier. Please contact us if this does not agree with your records.

DO NOT CALL
Attention Louisiana Customers: If your business makes outbound telephone solicitations, you must comply with both the National Do-Not-Call regulations as set forth in 47 C.F.R. Section 64.1200 and 16 C.F.R. Part 310 as well as Louisiana Revised Statutes 45:844.11 thru 45:844.15. Businesses wishing to engage in telephone solicitations of residential subscribers within the state of Louisiana must do so in compliance with LPSC Do Not Call General Order, October 26, 2005.

EXPRESS TICKETING
AT&T Express Ticketing enables you to quickly and easily submit and track the status of trouble tickets for certain voice, data, and managed services from your mobile device, tablet, or PC. You do not need to register in advance.
www.ATT.com/ExpressTicketing

-1d

-1d

-1d

\$32.44

x

x

x



at&t

ST PAUL LUTHERAN
ATTN TREASURER
2624 BURGUNDY ST
NEW ORLEANS LA 70117-7304

Page 3 of 3
Account Number 504 947-1773 468 0462
Billing Date Dec 26, 2014

Terms and Conditions

DISPUTED DEBTS

Please note, any check or payment instrument in an amount less than the full amount due that you send AT&T marked "PAID IN FULL" or otherwise tender as full satisfaction of a disputed amount, must be sent to AT&T Accounts Receivable Management, 3196 Highway 280 Rm 202N, Birmingham, AL 35243, and NOT the payment address shown on the payment return document. Thank you for choosing AT&T for your communications needs.

LATE CHARGE REMINDER

An additional charge pursuant to tariff or other terms of service may apply to any unpaid balance after your next bill date.