



**WEST PHILADELPHIA
ACHIEVEMENT CHARTER ELEMENTARY SCHOOL**
ADMINISTRATIVE OFFICE
6701 CALLOWHILL STREET, PHILA. PA 19151
TEL: 215.476.6471 ** FAX: 215.476.6481

December 9, 2015

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Dear Sir/Madame:

Re: CC DOCKET NO. 02-6
Applicant: **West Philadelphia Achievement Charter Elementary School**
BEN: **231725**
Form 471 number: **Unassigned**
SPIN: **143000677 (Verizon Wireless Cellco Partnership)**
FRN# **Unassigned**
Appeal Letter: **"Administrator's Decision on Appeal – Funding Year 2015-2016"**
Decision we are appealing: **"Denied"**

I am writing to appeal USAC's decision to deny West Philadelphia Achievement Charter's appeal regarding adding a missing funding request (FRN) for Verizon Wireless Cellphone Services in the funding year 2015-16 Erate application.

As detailed in our appeal to USAC:

- As with previous years, our school requested the abovementioned service on Form 470
- Quotes were received from vendors, we performed our evaluation, prepared Item 21 template for filing
- We completed our form 471s filing on time before the window closed

We found out that this FRN was missing around the end of May and thus we reached out to our state coordinator for advice regarding the possible remediation action for this missing FRN. We were informed that it is possible to request to have the missing FRN added into the application during the PIA review process. So the school decided to take the route since the status of the application at that time was "Under Review", which would mean that a reviewer has been assigned and would soon be contacting the school and we would have the opportunity to make that request.

However, due to the fast processing of this year's Erate applications, before we knew it, we had received the Funding Commitment for the application. There was no one from the PIA review team who contacted us during the review process. Hence, we did not get a chance to make the request.

Accordingly to program guideline as well as stated in the denied reason, *"Program procedures allow applicants to amend their applications and correct ministerial and clerical errors on their FCC Forms including adding a funding requests until a Funding Commitment Decision Letter (FCDL) is issued."* In reference to this, the school was making an attempt to request for the missing FRN to be added into the application during the PIA review process. Unfortunately, the school was not sure who was reviewing the application at that time and could not make contact in time before the Funding Commitment was issued.



This should not be viewed as an intentional error or an intentional request to submit a new FRN after the window is closed. School did request for the service as listed in Form 470, quotes were received and vendor was selected. All paperwork was prepared for the filing and the filing was completed on time. We were just not sure why was the FRN missing after the application was filed. It could also be a potential technical glitch that the FRN was left out as it was the first time that the filing was on a new filing system implemented for the year 2015-16.

Therefore, I plead to FCC review committee to please consider our appeal and please grant us approval on this appeal. The funding is very critical to the school and the students as we had planned the budgeting for the school year based on our successful experience with Erate funding over the past 10 years.

Please feel free to contact me via phone at 215-476-6471, or via email stacy4home@aol.com, should more information be required from me in order to help you with your assessment of our appeal.

I appreciate the time you have taken to read my appeal letter and I look forward to hearing from you soon.

Thank you very much.

Yours Faithfully,



Stacy R. Phillips
CEO
West Philadelphia Achievement Charter Elementary School

Enclosed:

- A copy of Letter "Administrator's Decision on Appeal – Funding Year 2015-2016" that we are appealing on dated October 29, 2015
- A copy of our Item 21 template paperwork that we prepared prior to the filing
- A copy of the Verizon Wireless Quote received during the bidding process

Stacy Phillips
West Philadelphia Achievement Charter
Elementary
6701 Callowhill Street
Philadelphia, PA 19151



Billed Entity Number: 231725
Form 471 Application Number: 1034007
Form 486 Application Number:



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

October 29, 2015

Stacy Phillips
West Philadelphia Achievement Charter Elementary
6701 Callowhill Street
Philadelphia, PA 19151

Re: Applicant Name: WEST PHILADELPHIA ACHIEVEMENT
CHARTER ELEMENTARY
Billed Entity Number: 231725
Form 471 Application Number: 1034007
Funding Request Number(s): 1 Unassigned
Your Correspondence Dated: August 04, 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): 1 Unassigned
Decision on Appeal: **Denied**
Explanation:

- During appeal review of your FCC Form 471 #1034007, you requested that a new funding request 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 requests until a Funding Commitment Decision Letter (FCDL) is issued. USAC denies your request to add a Funding Request Number (FRN) to your application after filing of the FCC Form 471 #1034007, as this request was not received prior to the FCDL issued on June 12, 2015. In your appeal, you did not demonstrate that USAC's determination was incorrect. New funding requests cannot be submitted through the appeals process and after the issuance of the FCDL. 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 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).

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



TAKE ADVANTAGE OF THE POWER TO DO MORE.

4G LTE gives you a competitive edge on the go.

Dear West Philadelphia Achievement Charter School,

Verizon Wireless is pleased to submit our response to your Request for Proposal. Verizon Wireless offers the most extensive and the most reliable cellular networks in the country, as well as the nation's most reliable high-speed wireless broadband network. We offer innovative choices for wireless services, including voice, data, messaging, Internet access, e-mail, and e-commerce services, as well as custom solutions.

Please be advised that Verizon Wireless participates under the Western States Contracting Alliance (WSCA) Contract for Services #1907 ("the Agreement"). The WSCA pricing, terms and conditions negotiated on behalf of the member states and political subdivisions enable Verizon Wireless to offer you the lowest possible prices for cellular services. All terms and conditions will be governed by the WSCA Master Agreement and the Participating Addendum. The WSCA Agreement, Addenda and Attachments can be found on AboutWSCA.Org site for your review. The current Agreement includes the following:

- Monthly access discount for agency-responsible lines on select calling plans with a monthly access charge of \$34.99 or more;
- Equipment discounts at the highest attainment tier;
- No early termination or activation fees on government liable lines;
- 25% discount off the retail price of accessories;
- Current Term: April 16, 2012 through October 31, 2016

Please be aware, this quote does not incorporate or include any other prior written or oral communications, materials, documents, representations, or presentations of any kind. No part of this quote may be modified unless done so in writing and signed by an authorized representative of Verizon Wireless. This quote is valid for thirty (30) days, unless otherwise agreed upon between the Agency and Verizon Wireless.

We look forward to your favorable review of our proposal. Should you have any questions or need further clarification on any aspect of this offer, please contact me by e-mail or at the phone number listed below.

The terms of this quote are valid through 02/13/2015.

Sincerely,

James Booth
James.Booth@vzw.com
Mobile # (215)316-8006
Office # (215)316-8006
Fax # (215)604-6833



TAKE ADVANTAGE OF THE POWER TO DO MORE.
4G LTE gives you a competitive edge on the go.

Here's a summary of your estimate:

One-Time Charges (Equipment, Accessories & Credits)*	\$0.00
Monthly Recurring Charges (Voice/Data Plans & Addl. Services)	\$1,769.78
Total Lines	46
Total Monthly Minutes	12000
Total Shared Minutes	7400

The following pages contain a detailed breakdown of the Verizon Wireless discounts on the products and services summarized above.

If you have any questions regarding this estimate, or if you would like additional information about Verizon Wireless solutions, please feel free to contact me. I look forward to working with you to fulfill your wireless communication needs.

Sincerely,

James Booth
James.Booth@vzw.com
Mobile # (215)316-8006
Office # (215)316-8006
Fax # (215)604-6833

*Equipment price estimates may be based on individual line term agreements of 12 months, see the equipment summary page for more information. Our Surcharges (Incl. Fed. Univ. Svc. of 17.5% of interstate & int'l telecom charges (varies quarterly), 16¢ Regulatory & 99¢ Administrative/line/mo., & others by area) are not taxes (details: 1-888-684-1888); gov't taxes & our surcharges could add 7% - 41% to your bill. Equipment and Accessory pricing is subject to applicable state and local sales tax. Subject to the Western States Contract Alliance calling plan terms and conditions. Available only on the State or local government responsible lines. In CA, equipment is taxed on the pre-discounted retail price. Activation fee/line: \$35. Up to \$175 early termination fee (\$350 for advanced devices) & add'l charges for extra minutes & data sent/received. Offers & coverage, varying by service, not available everywhere; see vzw.com. ©2013 Verizon Wireless.

IMPORTANT CONSUMER INFORMATION: Prices referenced in this document are for estimating purposes only. Actual prices will be based on current equipment, calling plan and feature charges available at the time of purchase and are subject to change without notice. Pricing and discounts described herein are available to business customers signing a Western States Contract Alliance Agreement. Equipment is subject to availability. All services are subject to the State of California Wireless Services Agreement and calling plan and features selected for each line of service. RESELLING OF VERIZON WIRELESS SERVICES IS PROHIBITED. No changes can be made to this document.



Verizon Wireless Service Estimate

**West Philadelphia Achievement Charter School
Department: 1**

MONTHLY RECURRING CHARGES:

Service Plans Eligible for 23% Corporate Discount

Plan	Anytime Minutes	Overage Rate(min)	Data Allowance	Retail Monthly Access	Discounted Monthly Access	Number of Lines	Total Price
Nationwide for Business Talk Plan	4000	0.25	-	\$149.99	\$115.49	3	\$346.47
Total Voice & Data Service Plans Monthly Access Fees							\$346.47

Custom Service Plans

Plan	Shared Minutes	Overage Rate(min)	Data Allowance	Overage Rate(data)	Discounted Monthly Access	Number of Lines	Total Price
WSCA VZW Nationwide for Government Share Calling Plans	100	0.25	-	-	\$23.98	26	\$623.48
WSCA Nationwide Email Government Share Plan	400	0.25	-	-	\$49.99	12	\$599.88
WSCA MBB Data Plans		-	Unlimited	10.00 per GB	\$39.99	5	\$199.95
Total Voice & Data Service Plans							\$1,423.31

Total Monthly Charges	\$1,769.78
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