



October 27, 2015

Letter of Appeal
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

To Whom It May Concern:

This is a letter of appeal relating to the Notification of Improperly Disbursed Funds notification Letter issued by USAC on September 8, 2015 for the following:

Appellant/Organization Name	TURLOCK UNIFIED SCHOOL DISTRICT
BEN	16027882
Form 471	937218
Funding Request Numbers	2661169

The reason cited was that it was determined that "Services were delivered to an entity that was not approved on an FCC Form 471 and is therefore ineligible to receive discount services".

We do not agree with this assessment that disbursed funds should be recovered for FRN #2611669.

1. The entity in question is the address for Stanislaus County Office of Education (Stanislaus COE) SPIN 143012124
2. Stanislaus COE SPIN 143012124 is located at 1100 H Street but is NOT part of the Turlock Unified School District and should NOT be associated with the BEN of the Turlock USD.
3. Stanislaus COE, located at 1100 H Street, is NOT identified on the Turlock USD contract but is shown on the bill to represent the circuit that goes from Stanislaus COE SPIN 143012124 to Turlock USD.
4. Stanislaus COE SPIN 143012124 is Turlock USD's internet access provider under FRN 2611709 but they do not provide the circuit it runs on so they have to obtain from a telecommunications provider in this case, Charter Fiberlink.
5. The circuit identified on the attached contract ("*Charter WAN 2010*"- 1100 H Street, and identified on the network diagram (see attached "*img124.pdf*") represents the circuit that Internet traffic runs on from Stanislaus COE located at 1100 H Street to Turlock USD.
6. On the diagram, where the arrow points to the circuit coming from Stanislaus COE, this is the circuit through which Stanislaus COE delivers their internet to Turlock USD. The circuit is provided by Charter Fiberlink and Stanislaus COE is not a recipient of their service. Turlock USD is the recipient of Charter Fiberlink's telecommunications service as this is the transport circuit from their internet service provider.

If you review FRN #2611709, you will see the FRN is designated for Stanislaus COE as the Service Provider to deliver Internet Service to Turlock USD.

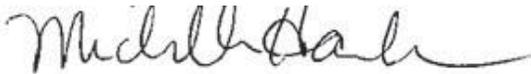
- FRN #2611709 does not, however, include the circuit or transport.
- The circuit provided by Charter for FRN #2611669 does not include the Stanislaus COE as an endpoint on the Turlock USD network, but it is represented on Turlock's bill at 1100 H Street since Stanislaus COE is the provider of Internet Access for Turlock USD.
- If Stanislaus COE site location was to be added to Turlock USD's application, it would not be accurate as Stanislaus COE, in this instance, is Turlock USD's Internet Service Provider.

It is standard that the Internet Service Provider termination point, specifically when it's an Educational Services Agency (County Office of Education in the State of California), is shown on the Telecommunications Service Provider contract and/or the Telecom transport invoice and/or contract.

Charter is unique because they list service locations on the bills, but other carriers don't necessarily list out the addresses.

We respectfully request that the Notification of Improperly Disbursed Funds notification Letter issued by USAC on September 8, 2015 be overturned and that funding for the FRN be approved as it was originally requested.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Harken". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michelle Harken
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Michelle Harken

From: Bev Agron <bagron@csmcentral.com>
Sent: Friday, November 6, 2015 8:47 AM
To: 'Appeals@sl.universalservice.org'
Cc: Nicole Esparza
Subject: Appeal of Improperly Disbursed Funds for Turlock USD, BEN #16027882, Form 471 #937218, FRN #2611669
Attachments: Turlock Year 17 Appeal App FRN #2611669.docx; Turlock LOA Signed.pdf; Improperly Disbursed Funds Letter 9-8-2015.pdf; Charter WAN 2010.pdf; img124.pdf

Please see attached appeal for:

- Turlock Unified School District BEN 16027882, Form 471 937218

Please contact me with any questions.

Bev Agron
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