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March 7, 2016

Request to Add Region to Application and Increase %

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: **Catholic Region of Northwest/South Bronx**
Our Lady of Mt. Carmel BEN 10555 App 1029843 (add Region and increase %)
Our Lady of Mt. Carmel BEN 10555 App 1047077 (add Region only)
St. John's Elementary BEN 10635 App 1031845 & 1036028 (add Region only)
St. Luke's BEN 10463 App 1031826 (add Region and increase %)
St. Luke's BEN 10463 App 1036013 (add Region only)

Region BEN #: **16085430**
Applicant Form 471 #: **1029843, 1047077, 1031845, 1036028, 1031826, 1036013**

We are appealing the Funding Decision Commitment Letters for the above schools and seek corrections of the discount calculation for all of their 2015-2016 FRNs from their individual E-Rate discount levels to the correct average discount level of the Central Administrative Agency.

When originally filed, the school's funding was determined through individual discount levels. After completing the filings for the school, and upon reaching the PIA Review stage, we discovered that the schools were actually part of a Central Administrative Agency named "Catholic School Region of Northwest and South Bronx, BEN 16085430" and therefore the school's discount level should have been calculated using the CAA's aggregate data.

This "Regional/CAA" status was unknown to us prior to this discovery. Immediately upon this discovery, we contacted USAC looking for guidance. This letter reflects the guidance provided. At this time, we are asking you to add "The Catholic School Region of Northwest and South Bronx, BEN 16085430" as a NIF to the Form 471, and to adjust the approved

discount level of the school to reflect the discount level of "Catholic School Region of Northwest and South Bronx" of 80%.

Attached is a copy of the Charter of Catholic School Region of Northwest and South Bronx which delineates all of the schools that are part of this CAA, an LOA and a spreadsheet showing all of the CAA schools and the enrollment & low income data of the CAA.

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

Letter of Agency for E-rate funding

This letter authorizes eRateProgram LLC to act as our agent in all matters, including signing and certifying all forms, required to obtain E-Rate funding for the 2015 and 2016 funding cycles ending 09/30/2017 for Regional Schools shown on Exhibit A – attached.

I certify our Schools "meets the definition of elementary and secondary schools under the No Child Left Behind Act of 2001 (20 U.S.C. § 7801(18) and (38)". (Check A or B)

A. An elementary school is a non-profit institutional day or residential school, including a public elementary charter school, that provides elementary education, as determined under state law. Our endowment is less than \$50,000,000.

We meet this test Y N

B. A secondary school is a non-profit institutional day or residential school, including a public secondary charter, school that provides secondary education, as determined under state law, except that such term does not include any education beyond grade 12. , Our endowment is less than \$50,000,000.

We meet this test Y N

C. We have access to sufficient funding to use all services requested for 2012-2014.

D. We will not sell, resell, or misuse services purchased using E-rate funds.

E. We recognize that E-rate discount levels and calculations are subject to change annually and that discount levels at which Priority 2 funding is approved vary from year to year.

F. We agree to retain all E-Rate related documents at least 5 years after last receipt of E-Rate funded services; including all documentation of compliance with open-bidding rules, vendor selection criteria, and all notes about E-rates.

G. I have the authority to order Telecommunications, Internet Access, Internal Connections, or Maintenance services requested through E-rates.

H. I authorize our consultant to access our Customer Proprietary Network Information ("CPNI") and to receive all information from our Service Providers needed to facilitate receipt of our E-Rate funding.

I. I certify that neither I nor our entity is barred from receiving E-rate funding.

I certify that I am authorized to sign this Letter of Agency and that I will not accept bribes, kickbacks or engage in any unlawful conduct involving E-rate funds.

To the best of my knowledge, information and belief, we are eligible to receive E-Rate funds, as noted in paragraph A or B above, and the information we supply to eRateProgram LLC for E-rate submissions is true and accurate.

Timothy Finnegan
(Printed Name of Signer)

Catholic School Region of the Northwest and South Bronx
(Printed name of Client)

09602 Harding Ave
Bronx NY 10465
(Printed Address of client)

5/15/15
(Date)

[Signature]
(Signature)

Business Manager
(Printed Title of person signing)

The University of the State of New York
Education  Department

**CATHOLIC SCHOOL REGION OF THE NORTHWEST AND SOUTH BRONX
ABSOLUTE CHARTER**

This Instrument Witnesseth That the Board of Regents for and on behalf of the Education Department of the State of New York at their meeting of July 16, 2012

Voted, that

1. An absolute charter in the first instance is granted incorporating Timothy Cardinal Dolan, Bishop Dennis Sullivan, Monsignor Gregory Mustaciuolo, Timothy McNiff, Rev. Joseph Franco and their associates and successors as an education corporation under the corporate name of Catholic School Region of the Northwest and South Bronx, located in the city, county and state of New York.

2. The purposes for which such corporation is formed are to operate pre-kindergarten through grade eight co-educational Catholic elementary schools at the following locations:

- (1) Holy Spirit School, 1960 University Avenue, Bronx, New York, 10453;
- (2) Our Lady of Angels School, 2865 Claflin Avenue, Bronx, New York, 10468;
- (3) Our Lady of Mercy School, 2512 Marion Avenue, Bronx, New York, 10458;
- (4) Our Lady of Mount Carmel School, 2465 Bathgate Avenue, Bronx, New York, 10458;
- (5) Our Lady of Refuge School, 2708 Briggs Avenue, Bronx, New York, 10458;
- (6) St. Angela Merici School, 266 East 163rd Street, Bronx, New York, 10451;
- (7) St. Ann School, 3511 Bainbridge Avenue, Bronx, New York, 10467;
- (8) St. Brendan School, 268 East 207th Street, Bronx, New York, 10467;
- (9) St. Gabriel School, 590 West 235th Street, Bronx, New York, 10463;
- (10) St. Jerome School, 222 Alexander Avenue, Bronx, New York, 10454;
- (11) St. John School, 3143 Kingsbridge Avenue, Bronx, New York, 10463;
- (12) St. Joseph School, 1946 Bathgate Avenue, Bronx, New York, 10457;
- (13) St. Luke School, 608 East 139th Street, Bronx, New York, 10454;
- (14) St. Margaret of Cortona School, 452 West 260th Street, Bronx, New York, 10471;
- (15) St. Philip Neri School, 3031 Grand Concourse, Bronx, New York, 10468;
- (16) St. Simon Stock School, 2195 Valentine Avenue, Bronx, New York, 10457;
- (17) St. Thomas Aquinas School, 1909 Daly Avenue, Bronx, New York, 10460;
- (18) Visitation School, 171 West 239th Street, Bronx, New York, 10463.

The corporation shall have the power (a) to buy, own, sell, assign, mortgage, or lease any interest in real estate and personal property and to construct, operate, and maintain improvements thereon necessary and incident to the accomplishment of the purposes set forth herein, (b) to borrow money and issue evidence of indebtedness in furtherance of any or all objects of its business, and to secure the same by mortgage, pledge, or other lien on the corporation's property, and (c) to do and perform all other acts permissible under law, engage in any kind of activity, and to enter into, perform and carry out contracts of any kind, necessary and incident to the purposes of the corporation.

3. The persons named as incorporators shall constitute the first board of trustees. The board shall have power to adopt bylaws, including therein provisions fixing the method of election and the term of office of trustees, and shall have power by vote of two-thirds of all the members of the board of trustees to change the number of trustees to be not

more than twenty-five nor less than five. The trustees shall at all times include *ex officio* those persons as may be so designated in accordance with the corporation's by-laws.

4. The names and post office addresses of the first trustees are as follows:

Timothy Cardinal Dolan
1011 First Avenue
New York, New York 10022

Bishop Dennis Sullivan
1011 First Avenue
New York, New York 10022

Monsignor Gregory Mustaciuolo
1011 First Avenue
New York, New York 10022

Timothy McNiff
1011 First Avenue
New York, New York 10022

Rev. Joseph Franco
1253 Shakespeare Avenue
Bronx, New York 10452

5. The corporation hereby created shall be a nonstock corporation organized and operated exclusively for educational purposes, as defined in section 501(c)(3) of the Internal Revenue Code of 1986 (or the corresponding provision of any future Federal tax code), and no part of the net earnings or net income shall inure to the benefit of any member, trustee, director or officer of the corporation, or any private individual (except that reasonable compensation may be paid for services rendered to or for the corporation), and no member, trustee, director or officer of the corporation, or any private individual, shall be entitled to share in the distribution of any of the corporate assets upon dissolution of the corporation.

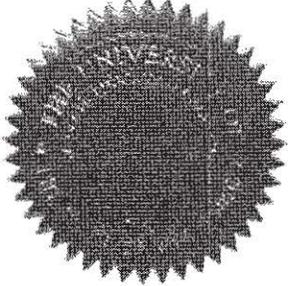
6. Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1986 (or the corresponding provision of any future Federal tax code) or (b) by a corporation, contributions to which are deductible under section 170(c)(2) of the Internal Revenue Code of 1986 (or the corresponding provision of any future Federal tax code).

7. No substantial part of the activities of the corporation shall be devoted to carrying on propaganda, or otherwise attempting to influence legislation, (except to the extent authorized by Internal Revenue Code section 501(h) as amended, or the corresponding provision of any future Federal tax code, during any fiscal year or years in which the corporation has chosen to utilize the benefits authorized by the statutory provision) and the corporation shall not participate in or intervene (including the publishing or distribution of statements) in any political campaign on behalf of or in opposition to any candidate for public office.

8. Upon dissolution of the corporation, the board of trustees shall, after paying or making provision for the payment of all the liabilities of the corporation, dispose of the remaining assets of the corporation for a similar use or purpose to such organizations affiliated with the Archdiocese of New York and organized and operated exclusively for one or more exempt purposes, within the meaning of section 501(c)(3) of the Internal Revenue Code of 1986 (or the corresponding provision of any future Federal tax code). Any such assets not so disposed of shall be disposed of by order of the Supreme Court of the State of New York in the judicial district where the principal office of the corporation is then located, exclusively for such purposes or to such organization or organizations, organized and operated exclusively for such purposes, as said Court shall determine.

9. The principal office of the corporation shall be located at 1011 First Avenue, New York, New York 10022.

10. The Commissioner of Education is designated as the representative of the corporation upon whom process in any action or proceeding against it may be served.



Granted, July 16, 2012, by the Board of Regents of The University of the State of New York, for and on behalf of the State Education Department, and executed under the seal of said University and recorded as Number 25,700.

Meryl A. Locke

Chancellor

John B. B. G.

President of the University and
Commissioner of Education



CATHOLIC SCHOOL REGION
NORTHWEST/SOUTH BRONX
in the
ARCHDIOCESE
of NEW YORK

September 11, 2015

Dear USAC reviewer;

Schools in the Catholic School Region of Northwest/South Bronx had 3,520 students enrolled at the time of the region's 2015 E-Rate filing. Each low income survey used to determine this data contained, at minimum, the following information:

- Name of family and first name of each student;
- Size of family; and
- Income level of the family.

The completed surveys identified 2,111 students from families whose income is below the E-Rate eligibility guidelines. Those 2,111 eligible students make up 60 percent of the students enrolled, supporting a discount rate of 80 percent. We attach here one completed survey with personal data blacked out. We maintain all completed and returned surveys on file for at least ten years.

Region	Name of School	BEN	Enrollment	F/R	Free	Reduced
16085430						
Northwest/South Bronx	O.L. of Mt. Carmel	10555	282	202	164	38
Northwest/South Bronx	O.L. of Refuge	10549	287	201	166	35
Northwest/South Bronx	St. Angela Merici	10406	305	302	0	0
Northwest/South Bronx	St. Ann	10678	219	99	77	22
Northwest/South Bronx	St. Brendan	10685	272	145	127	18
Northwest/South Bronx	St. Gabriel	10631	231	12	0	12
Northwest/South Bronx	St. John	10635	222	79	53	26
Northwest/South Bronx	St. Joseph	10527	339	339		
Northwest/South Bronx	St. Luke	10463	235	131	113	18
Northwest/South Bronx	St. Margaret of Cortona	10734	315	13		
Northwest/South Bronx	St. Phillip Neri	10703	242	136	105	31
Northwest/South Bronx	St. Simon Stock	16051195	202	192	192	0
Northwest/South Bronx	St. Thomas Aquinas	10584	180	167	141	26
Northwest/South Bronx	Visitation	10632	189	93	53	40
			3520	2111		
					E-Rate Discount	
					60.0%	80%

"I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a, of Block 4 of the Form 471."

Respectfully,

Mr. Tim Finnegan
Business Manager
Catholic School Region of Northwest/South Bronx
Archdiocese of New York



Patron Saint
John the Evangelist