

March 20, 2016

Letter of Appeal  
Ms. Marlene H. Dortch  
Federal Communication Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools and Libraries Universal Service Support Mechanism.  
CC Docket No.02-6

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In re: Community Joint Council For Economic Opportunity of Clinton & Franklin Counties  
Inc.  
Billed Entity Number: 16051127  
Appellant: E rate Solutions Group  
Fund Year: 2015 FCC Form 471:1017245

Decision Letter Date Oct. 29, 2015  
Appeal Postmark Date Dec. 4, 2015

This is a "Letter of Appeal" for Form 471 Application 1017245 with associated FRN's:  
2761219, 2761226, 2761234, 2761242

BEN and contact information:

Appellant Name:

Katherine Weiss, Authorized Representative  
Email: kweiss@erategroup.com  
Phone: 732-946-8300  
Fax: 732-879-0400

Applicant Name & BEN:

Name: **Community Joint Council For Economic Opportunity of Clinton & Franklin Counties Inc.**  
BEN: **16040361**

471 Reference & Funding Year:

Form 471: 1017245  
Funding Year: 2015

471 – 1017245  
FRN Information:  
Funding Request Number: 2761219  
Service Provider: Verizon Wireless (Cellco Partnership)  
SPIN: 143000677

471 – 1017245  
FRN Information:  
Funding Request Number: 2761226  
Service Provider: PrimeLink, Inc  
SPIN: 143016062

471 – 1017245  
FRN Information:  
Funding Request Number: 2761234  
Service Provider: PrimeLink, Inc  
SPIN: 143016062

471 – 1017245  
FRN Information:  
Funding Request Number: 2761242  
Service Provider: FRONTIER COMMUNICATIONS OF AMERICA  
SPIN: 143001110

Dear Ms. Dortch:

On Feb 20, 2016 a response to Appeals Reviewer was sent by the applicant's authorized consultant – see Exhibit IA - 2015 App 1017245. An extension was requested until March 1, 2016 to submit any missing information. On March 1, 2016, See Exhibit IB, a revised submission was sent with the corrected information which was before the due date.

The review procedures for the standard Head Start validation questions have been very inconsistent – see the following:

Exhibit II & III – Appeals of 2015/2016 application were approved based upon responses for 2014/2015 applications.

Exhibit IV – PIA approved 2015/2016 application were approved based upon responses for 2014/2015 applications.

Exhibit V - PIA approved 2015/2016 application were approved based upon responses from the consultant.

Exhibit VI – Example of standard Appeals Review procedure to inform of incomplete information.

The above are a few examples in support of the inconsistent and confusing review procedures regarding Head Start validation questions. Given the confusing/inconsistent review procedures and the fact that the appeals deadline had not passed, the enclosed information should be considered – See Exhibit 1A. In addition, the appeals reviewer never indicated that the information submitted is not complete/sufficient as is standard procedure with all Appeals review and the appeal cover letter asked for an extension to submit missing information and if there were any questions.

Please instruct USAC to reconsider the appeal of App 1017245 based upon the following:

- 1) Appeals Review procedures were inconsistent (and confusing) with standard PIA procedures that have been followed for Funding Years 2015 and prior.
- 2) Appeals Review procedures were inconsistent (and confusing) with other Appeal Review procedures.
- 3) Appeals Reviewer never contacted us regarding incomplete or missing information as is the standard procedure followed
- 4) Requests were made to Appeals Manager to reconsider the appeal.
- 5) Appeal containing new information required for approval was submitted on 3/1/2016 – see Exhibit IB
- 6) Standard Review procedures notifying incomplete information provided was not provided

A reversal of the denial of this funding request or reconsideration is sought.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any procedural inconsistencies or delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,  
*Katherine M. Weiss*  
Consultant

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

February 26, 2016

Katherine M. Weiss  
E Rate Solutions Group  
P.O. Box 460  
Colts Neck, NJ 07722

Re: Applicant Name: JOINT COUNCIL FOR ECONOMIC  
OPPORTUNITY OF CLINTON &  
FRANKLIN COUNTIES, INC  
Billed Entity Number: 16040361  
Form 471 Application Number: 1017245  
Funding Request Number(s): 2761219, 2761226, 2761234, 2761242  
Your Correspondence Dated: December 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): 2761219, 2761226, 2761234, 2761242  
Decision on Appeal: **Denied**  
Explanation:

- Head Start services for children less than three years old are not eligible for discounts and must be cost allocated, unless otherwise noted. The record shows that for Funding Year 2015 Application Number 1017245 you were requested to provide documentation from a school official of Joint Council for Economic Opportunity of Clinton & Franklin Counties, Inc. to determine the eligibility of the students enrolled at the following entities: Beekman Center, Brushton Center, Champlain Center, Chateaugay Center, Cumberland Head Modular, Cumberland Head School, Peru Center, Tupper Lake Center, Jceo Office, Malone Head Start Admin Office, Keeseville Head Start Center, Nac Head Start Center and Plattsburgh City So. Head Start Center. Specifically, we needed documentation to

see if the enrollment count on the aforementioned application included students under the age of 3. The record further shows that you submitted information that did not address the student population for the Funding Year 2015 application. Instead, you provided information that addressed the student enrollment for Funding Year 2014 FCC Form 471 Application Number 966986. In support of your appeal, you have provided the same documentation that was provided during the initial review. Since your appeal did not show that USAC's determination was incorrect your appeal is denied.

- FCC rules provide that only schools meeting the statutory definition of "elementary school" or "secondary school" as defined in section 47 C.F.R. sec. 54.500(c) or (k) and not excluded under paragraphs (a)(2) or (a)(3) of this section shall be eligible for discounts on telecommunications and other supported services. *See* 47 C.F.R. sec. 54.501(a)(1). The FCC has defined a school as including individual schools, school districts, and consortia of schools and/or school districts. *See* Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 9002, FCC 97-157 para. 425, n.1087 (rel. May 8, 1997). An "elementary school" means an elementary school as defined in 20 U.S.C. § 7801(18), a non-profit institutional day or residential school, including a public elementary charter school, that provides elementary education, as determined under state law. A "secondary school" means a secondary school as defined in 20 U.S.C. § 7801(38), 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 the term does not include any education beyond grade 12. *See* 47 C.F.R. sec. 54.500(c) and (k). The FCC's Bootheel Consortium Order directed USAC to permit the applicant to revise its funding request to remove the services for ineligible entities or allow the applicant to provide additional documentation to show why the relevant entity is eligible within 15 calendar days from the date of receipt of notice in writing by USAC. *See* Requests for Review of Decisions of the Universal Service Administrator by Bootheel Consortium, Silver City, New Mexico, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-309634, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8747, FCC 07-62 para. 10 (May 8, 2007).

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

Exhibit I A

1059

**Subject:** Fw: Appeal - Joint Council- App 1017245  
**From:** Joseph Weiss (jweiss@erategroup.com)  
**To:** andrew.dick@solixinc.com;  
**Date:** Saturday, February 20, 2016 6:49 PM

Enclosed is revised appeal letter along with requested entity verification and validation to adjust the discount level to 90% as this is a valid Head Start.

Please let me know if you have any questions.

Please issue extension to submit any missing information.

Thank you

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

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**Attachments**

- JCEO\_Appeal\_2015.pdf (59.67KB)

December 4, 2015

Letter of Appeal  
Schools & Libraries Division – Correspondence Unit  
100 South Jefferson Rd  
PO Box 902  
Whippany, NJ 07981

Appeal Reviewer:

REVISED LETTER

This is a "Letter of Appeal" for Form 471 Application 1017245 with associated FRN's: 2761219, 2761226, 2761234, 2761242

Case # 22- 867505

BEN and contact information:

Appellant Name:

Katherine Weiss, Authorized Representative  
Email: kweiss@erategroup.com  
Phone: 732-946-8300  
Fax: 732-879-0400

Applicant Name & BEN:

Name: **JOINT COUNCIL FOR ECONOMIC OPPORTUNITY OF CLINTON & FRANKLIN  
COUNTIES, INC**  
BEN: **16040361**

471 Reference & Funding Year:

Form 471: 1017245  
Funding Year: 2015

Text of Funding Commitment Decision Explanation:

According to the FCC Order 14-99, Voice services are subject to a phase down of support beginning in funding year 2015. As a result, the Discount Rate of this FRN was reduced from 90% to 20%.

Reason for Appeal and Documentation:

Requested information was not submitted/obtainable during the PIA review period. Information is available to validate the applicant as a valid Head Start at the 90% level– see below as this should be acceptable documentation.

Specific Concerns in reference to this application: Discount level was reduced from 90% to 20% although not stated in FCDL.

**From:** Rebecca M. Murphy <rlaclair@JCEO.org>

**To:** Joseph Weiss <jweiss@erategroup.com>

**Sent:** Wednesday, September 3, 2014 11:14 AM

**Subject:** RE: E-Rate Response - JCEOC

Good morning Mr. Weiss,

I have reviewed the responses below and they are correct.

Thank you,

Rebecca M. Murphy, CFO

JCEO

Phone: (518) 561-6310 ext. 314

Fax: (518) 562-2947

[rlaclair@jceo.org](mailto:rlaclair@jceo.org)

**From:** Joseph Weiss [<mailto:jweiss@erategroup.com>]  
**Sent:** Tuesday, September 02, 2014 9:20 PM  
**To:** Rebecca M. Murphy  
**Subject:** Re: E-Rate Response - JCEOC

**Please confirm that the following is correct:**

Based on the review of your Funding Year 2014 FCC Form 471 application 966986, we have determined that the entity(ies) listed below that are included in your request for services appear to be Head Start facility(ies).

In your state, Head Start services can be eligible for Head Start student populations, if the following conditions are met:

- The entity is part of a public school district, OR
- The entity is a stand-alone Head Start facility recognized by the state (for applicable states), OR

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/non-traditional/default.aspx>.

Listed below are the ineligible Head Start facility(ies):

<b>Entity</b>
BEEKMAN CENTER
BRUSHTON CENTER
CHAMPLAIN CENTER
CHATEAUGAY CNTER
CUMBERLAND HEAD MODULAR

Entity
CUMBERLAND HEAD SCHOOL
PERU CENTER
SARANAC CENTER
TUPPER LAKE CENTER
MALONE HEAD START SDMIN OFFICE
KEESEVILLE HAED START CENTER
NAC HEAD START CENTER
PLATTSBURGH CITY SO. HEAD START CENTER

### *Questions*

To assist us in the review of your application, we need the following information:

1. Provide third party documentation (i.e., documentation from your State Department of Education) demonstrating that the entities above meet Head Start requirements for your state.

- Does the facility(ies) listed above include Head Start students? **YES**

a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility**

- Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.

a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under 3**

b. If **Yes**, provide the enrollment count of students under the age of 3.

1. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See Block 4/5**

5. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 4/5**

a. Identify the ineligible student cost (students under the age of 3)

b. Identify the eligible student cost

1. Please confirm that the balance of the services, following the above cost allocation, is being provided to instructional facilities or classrooms that do not include any Head Start students. **Confirmed/N/A**

- Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

Specific Concerns in reference to this application: NA

471 – 1017245  
FRN Information:  
Funding Request Number: 2761219  
Service Provider: Verizon Wireless (Cellco Partnership)  
SPIN: 143000677

471 – 1017245  
FRN Information:  
Funding Request Number: 2761226  
Service Provider: PrimeLink, Inc  
SPIN: 143016062

471 – 1017245  
FRN Information:  
Funding Request Number: 2761234  
Service Provider: PrimeLink, Inc  
SPIN: 143016062

471 – 1017245  
FRN Information:  
Funding Request Number: 2761242  
Service Provider: FRONTIER COMMUNICATIONS OF AMERICA  
SPIN: 143001110

A reversal of the denial of this funding decision is sought to change the discount level to 90% as this is a valid Head Start Program.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,

*Katherine M. Weiss*

Consultant

Exhibit I B

1 of 5

**Subject:** Fw: Appeal - JCEO - App 1017245  
**From:** Joseph Weiss (jweiss@erategroup.com)  
**To:** andrew.dick@solixinc.com;  
**Date:** Tuesday, March 1, 2016 12:02 PM

Enclosed is revised appeal letter along with the requested documentation to validate the Head Start locations with current information..

Please note - Extension was requested/granted until 3/1/16, therefore the enclosed information should be considered/reviewed.

Please issue additional extension to submit any missing information and if more details are needed for the FRN reduction/modification.

Please confirm that the enclosed information will be considered.

Thank you

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

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#### Attachments

- JCEO\_Appeal\_2015.pdf (14.28KB)

December 4, 2015

Letter of Appeal  
Schools & Libraries Division – Correspondence Unit  
100 South Jefferson Rd  
PO Box 902  
Whippany, NJ 07981

Appeal Reviewer:

REVISED LETTER

This is a "Letter of Appeal" for Form 471 Application 1017245 with associated FRN's: 2761219, 2761226, 2761234, 2761242

Case # 22- 867505

BEN and contact information:

Appellant Name:

Katherine Weiss, Authorized Representative  
Email: kweiss@erategroup.com  
Phone: 732-946-8300  
Fax: 732-879-0400

Applicant Name & BEN:

Name: **JOINT COUNCIL FOR ECONOMIC OPPORTUNITY OF CLINTON & FRANKLIN  
COUNTIES, INC**  
BEN: **16040361**

471 Reference & Funding Year:

Form 471: 1017245  
Funding Year: 2015

Text of Funding Commitment Decision Explanation:

According to the FCC Order 14-99, Voice services are subject to a phase down of support beginning in funding year 2015. As a result, the Discount Rate of this FRN was reduced from 90% to 20%. Current Head Start validation not provided – not listed on FCDL.

Reason for Appeal and Documentation:

Current requested information was not submitted/obtainable during the PIA review period. However documentation used to validate the 2014/2015 application was provided. Current/revised Information is available to validate the applicant as a valid Head Start at the 90% level– see enclosed as this should be acceptable documentation.

Specific Concerns in reference to this application: Discount level was reduced from 90% to 20% although not stated in FCDL. Extension was requested/granted until 3/1/16, therefore the enclosed information should be considered/reviewed.

471 – 1017245

FRN Information:

Funding Request Number: 2761219  
Service Provider: Verizon Wireless (Cellco Partnership)  
SPIN: 143000677

471 – 1017245  
FRN Information:  
Funding Request Number: 2761226  
Service Provider: PrimeLink, Inc  
SPIN: 143016062

471 – 1017245  
FRN Information:  
Funding Request Number: 2761234  
Service Provider: PrimeLink, Inc  
SPIN: 143016062

471 – 1017245  
FRN Information:  
Funding Request Number: 2761242  
Service Provider: FRONTIER COMMUNICATIONS OF AMERICA  
SPIN: 143001110

A reversal of the denial of this funding decision is sought to change the discount level to 90% as this is a valid Head Start Program.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,  
*Katherine M. Weiss*  
Consultant



# JCEO

Joint Council for Economic Opportunity  
of Clinton and Franklin Counties, Inc.

54 Margaret St. • Plattsburgh, NY 12901 • (518) 561-6310 • Fax (518) 562-2947 • [www.jceo.org](http://www.jceo.org)  
Serving Clinton County Since 1966

**Bruce Garcia**  
Chief Executive Officer

Clinton County Programs

Community Outreach Program  
11 County-wide Locations  
Application, Information, and Referral Services  
Advocacy  
Family Self-Sufficiency

Day Care  
Orientation/Training  
Start-up Funding  
Resource and Referral Services  
Child Food Program

Energy Services Program  
Weatherization Assistance Program  
Empower New York  
Adirondack Energy Technical Group

Food and Nutrition Program  
Emergency Food Pantries

Head Start  
Comprehensive Early Childhood Education Program 10 Centers

Senior Outreach Program  
Information and Referral  
Friendly Visitor/Telephone Reassurance Service  
Senior Care/Senior Repair Service

Franklin County Programs

Community Outreach Program  
Application, Information, and Referral Services  
Advocacy  
Family Self-Sufficiency

Energy Services Program  
Weatherization Assistance Program  
Empower New York  
Adirondack Energy Technical Group

Nutrition Outreach and Education Program  
Application, Information, and Referral Services

Food Services Program  
Food Pantry  
Garden Stand/Vegetable Gardens  
Green Houses

Head Start  
Comprehensive Early Childhood Education Program 7 Centers  
3 Home-based

**UPDATED/REVISED 7/1/15**

**The following information is correct and is the same as the information provided for Funding Year 2014/2015.**

Listed below are the Head Start facility(ies):

Entity	Enroll	NSLP	
BEEKMAN CENTER	19	19	
BRUSHTON CENTER	20	20	
CHAMPLAIN CENTER	19	19	
CHATEAUGAY CENTER	17	17	
CUMBERLAND HEAD MODULAR	18	18	
CUMBERLAND HEAD SCHOOL	20	20	Students recently moved to Peru Center
PERU CENTER	40	40	
SARANAC CENTER	20	20	
TUPPER LAKE CENTER	20	20	
MALONE HEAD START ADMIN OFFICE	82	82	
KEESEVILLE HAED START CENTER	18	18	
NAC HEAD START CENTER	19	19	
PLATTSBURGH CITY SO. HEAD START CENTER	21	21	

Questions

To assist us in the review of your application, we need the following information regarding services for children under the age of three:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Entity(Facility) and not run by/(part of) a public school district**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under the age of 3**
  - b. If Yes, provide the enrollment count of students under the age of 3. **N/A**
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See above which modifies the Block 4-Discount Calculation of the FCC Form 471 that was filed.**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 5-Discount Funding Requests of the FCC Form 471 that was filed as all FRN's only represent eligible services/costs.**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost
5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

Rebecca M. Murphy, CFO  
3/1/16

# Transmission Log

HS Saturday, 2015-11-07 19:34 0000000000

Date	Time	Type	Job #	Length	Speed	Station Name/Number	Pgs	Status
2015-11-07	19:32	SCAN	02306	1:46	14400	19735996542	7	OK -- V.17 AM31

November 7, 2015

Letter of Appeal  
 Schools & Libraries Division – Correspondence Unit  
 100 South Jefferson Rd  
 PO Box 902  
 Whippany, NJ 07981

Appeal Reviewer:

This is a "Letter of Appeal" for Form 471 Application 1007311 with associated FRN's: 2734988, 2735002, 2735005, 2735008, 2735013

Case # 22- 862618

BEN and contact information:

Appellant Name:

Katherine Weiss, Authorized Representative  
 Email: kweiss@erategroup.com  
 Phone: 732-946-8300  
 Fax: 732-879-0400

Applicant Name & BEN:

Name: **Albany Community Action**  
 BEN: **16050688**

471 Reference & Funding Year:

Form 471: 1007311  
 Funding Year: 2015

Text of Funding Commitment Decision Explanation:

Information was not provided

Reason for Appeal and Documentation:

Information was available – see enclosed

Specific Concerns in reference to this application: NA

471 – 1007311

FRN Information:  
 Funding Request Number: 2734988  
 Service Provider: TVC  
 SPIN: 143026172

471 – 1007311

FRN Information:  
 Funding Request Number: 2735002  
 Service Provider: T Mobile  
 SPIN: 143026181

471 – 1007311

FRN Information:  
 Funding Request Number: 2735005  
 Service Provider: AT&T Mobility  
 SPIN: 143025240

November 7, 2015

Letter of Appeal  
Schools & Libraries Division – Correspondence Unit  
100 South Jefferson Rd  
PO Box 902  
Whippany, NJ 07981

Appeal Reviewer:

This is a "Letter of Appeal" for Form 471 Application 1007311 with associated FRN's: 2734988, 2735002, 2735005, 2735008, 2735013

Case # 22- 862618

BEN and contact information:

Appellant Name:

Katherine Weiss, Authorized Representative  
Email: kweiss@erategroup.com  
Phone: 732-946-8300  
Fax: 732-879-0400

Applicant Name & BEN:

Name: **Albany Community Action**  
BEN: **16050688**

471 Reference & Funding Year:

Form 471: 1007311  
Funding Year: 2015

Text of Funding Commitment Decision Explanation:  
Information was not provided

Reason for Appeal and Documentation:  
Information was available – see enclosed

Specific Concerns in reference to this application: NA

471 – 1007311

FRN Information:

Funding Request Number: 2734988  
Service Provider: TVC  
SPIN: 143026172

471 – 1007311

FRN Information:

Funding Request Number: 2735002  
Service Provider: T Mobile  
SPIN: 143026181

471 – 1007311

FRN Information:

Funding Request Number: 2735005  
Service Provider: AT&T Mobility  
SPIN: 143025240

471 – 1007311  
FRN Information:  
Funding Request Number: 2735008  
Service Provider: Verizon  
SPIN: 143001359

471 – 1007311  
FRN Information:  
Funding Request Number: 2735013  
Service Provider: Time Warner  
SPIN: 143019523

A reversal of the denial of this funding request is sought. I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,  
*Katherine M. Weiss*  
Consultant

**From:** Neenah Bland <NBland@albanycap.org>  
**To:** Joseph Weiss <jweiss@erategroup.com>  
**Sent:** Wednesday, September 24, 2014 12:32 PM  
**Subject:** RE: Albany Community

Hi Joseph,

Yes all answers below are correct.

Neenah A. Bland  
Acting Executive Director  
Albany Community Action Partnership (ACAP)  
333 Sheridan Avenue  
Albany, NY 12206  
Tel. 518-463-3175 x 126  
Fax 518-689-2233  
[nbland@albanycap.org](mailto:nbland@albanycap.org)  
[www.albanycap.org](http://www.albanycap.org)

**From:** Joseph Weiss [mailto:jweiss@erategroup.com]  
**Sent:** Wednesday, September 24, 2014 9:16 AM  
**To:** Joseph Weiss; Neenah Bland; Tracy Calone  
**Subject:** Re: Albany Community

**URGENT** - Please confirm ASAP/TODAY via email to avoid your application from being denied that the ANSWERS listed below are correct (these are the same responses that supplied in the past).

The purpose of these questions is just to make sure that refunds are not being claimed for children under 3 years old. No other details other than what is already answered below is needed.

Question 1a refers to whether the Head Start belong to the school district and not a private organization. Therefore unless you are a school district, the answer is separate facility.

Question 2a refers to enrollment counts which has already been adjusted (if needed) to remove any students under the age of 3.

Question 3 refers to the students listed in question 2a that qualify for the lunch program which is 100% and listed on Block 4 of the funding application that was filed.

Question 4 asks for a cost allocation for your Funding Request which has already been done and is listed on Block 5 of your funding application that was filed.

Listed below are the Head Start facility(ies):

Entity
AK 1ST SCHOOL
ACAP-EARLY LEARNING CENTER
GIFFEN UPK ELEMENTARY SCHOOL
HEAD START-BERNE/KNOW/WESTERLO UPK
WATERVLIET HEAD START
LINCOLN SQUARE
OGDEN MILLS
ORC-OLIVIA RORIE CENTER
REVENA HEAD START
WATERVLIET UPK
N. ALBANY YMCA HEAD START @ HANNAFORD EARLY CHILDHOOD CTR
ARBOUR HILL ELEMENTARY SCHOOL HS/UPK
PHILIP J SCHUYLER ACHIEVEMENT ACADEMY HEAD START

ABRAM LANSING ELEMENTARY SCHOOL HEAD START
BRIGHTER CHOICE HEAD START
COLONIE COMMUNITY CENTER HEAD START

#### Questions

To assist us in the review of your application, we need the following information regarding services for children under the age of three:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility and not part of a public school district**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.

a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under the age of 3**

b. If Yes, provide the enrollment count of students under the age of 3. **N/A**

3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See the Block 4 of the FCC Form 471 that was filed.**

4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 5 of the FCC Form 471 that was filed.**

a. Identify the ineligible student cost (students under the age of 3)

b. Identify the eligible student cost

5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

**Subject:** RE: Albany Community Action  
**From:** Persell, Patricia E (CCF) (Patricia.Persell@ccf.ny.gov)  
**To:** kweiss@erategroup.com; Renee Nasadoski@ccf.ny.gov  
**Date:** Tuesday, October 6, 2015 9:57 AM

Hi Katherine:

Here are the centers I can verify for Albany.

02CH3009	HS	Albany County Opportunity, Incorporated	Watervliet	2557 10th Ave	Watervliet Elementary School	Watervliet	NY	12189	1764	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Giffen Elementary School	274 S Pearl St		Albany	NY	12202	1829	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Ann Klose First (AK 1st)	295 Colonie St		Albany	NY	12210	1538	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Early Learning Center/ELC	25 Monroe St		Albany	NY	12210	2729	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Ogden Mills	1 Ogden Plaza		Cohoes	NY	12047		Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Olivia Rorie (ORC)	7 Morton Ave		Albany	NY	12202	1655	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Lincoln Square/LSQ	3 Lincoln Sq		Albany	NY	12202	1652	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Philip Schuyler/SAA	676 Clinton Ave		Albany	NY	12206	2216	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Arbor Hill Elementary School	1 Arbor Dr		Albany	NY	12207	1310	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Colonie Head Start	1653 Central Ave		Colonie	NY	12205	4021	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Ontario St	170 Ontario St		Albany	NY	12206	2321	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Berne-Knox-Westerlo (BKW)	1738 Helderberg Trl	Berne-Knox-Westerlo Elementary School	Berne	NY	12023	2926	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Ravena	15 Mountain Rd		Ravena	NY	12143	1234	Alban
02CH3009	HS	Albany County Opportunity, Incorporated	Green Island	171 Hudson Ave	Heatly Elementary School	Green Island	NY	12183	1212	Alban



## Patty Persell

New York State Head Start Collaboration Director

### NYS Council on Children and Families

52 Washington Street, Suite 99 West  
 Rensselaer, NY 12144

(518) 474-9352

Patricia.persell@ccf.ny.gov

[ccf.ny.gov](http://ccf.ny.gov)

**From:** Katherine M. Weiss [mailto:kweiss@erategroup.com]  
**Sent:** Monday, October 05, 2015 8:57 PM  
**To:** Nasadoski, Renee (CCF); Persell, Patricia E (CCF)  
**Subject:** Albany Community Action

Please confirm that these are valid Head Start Sites

<b>Entity Number:</b>	16083093
<b>Entity Name:</b>	GREEN ISLAND
<b>NCES District Number:</b>	
<b>Primary Street:</b>	171 HUDSON AVE
<b>Primary City:</b>	GREEN ISLAND
<b>Primary State:</b>	NY
<b>Primary Zip:</b>	12183

<b>Entity Number:</b>	16083094
<b>Entity Name:</b>	ONTARIO EARLY CHILDHOOD EDUCATION CENTER
<b>NCES District Number:</b>	
<b>Primary Street:</b>	170 ONTARIO STREET
<b>Primary City:</b>	ALBANY
<b>Primary State:</b>	NY
<b>Primary Zip:</b>	12206

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399

[www.erategroup.com](http://www.erategroup.com)

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**Attachments**

- image003.jpg (5.38KB)

# Transmission Log

Exhibit III  
10FS

HS

Sunday, 2015-11-08 07:42

0000000000

Date	Time	Type	Job #	Length	Speed	Station Name/Number	Pgs	Status
2015-11-08	07:41	SCAN	02310	1:19	14400	19735996542	4	OK -- V.17 AM31

November 7, 2015

Letter of Appeal  
Schools & Libraries Division – Correspondence Unit  
100 South Jefferson Rd  
PO Box 902  
Whippany, NJ 07981

Appeal Reviewer:

This is a "Letter of Appeal" for Form 471 Application 1017603 with associated FRN's: 2761977, 2761988, 2761991, 2761995, 2762001, 2762003, 2811495

Case # 22- 862645

BEN and contact information:

Appellant Name

Katherine Weiss, Authorized Representative  
Email: kweiss@erategroup.com  
Phone: 732-948-8300  
Fax: 732-879-0400

Applicant Name & BEN:

Name: **Warren**  
BEN: **16039188**

471 Reference & Funding Year:

Form 471: 1017603  
Funding Year: 2015

Text of Funding Commitment Decision Explanation:  
Information was not provided.

Reason for Appeal and Documentation:  
Information was available – see below

**From:** "executivedirector@warrencountyheadstart.org" <executivedirector@warrencountyheadstart.org>  
**To:** Joseph Weiss <jweiss@erategroup.com>  
**Sent:** Wednesday, September 24, 2014 3:35 PM  
**Subject:** Re: Warren County

These answers are correct

Kathy Stewart  
Executive Director  
Warren County Head Start, Inc.  
11 Pearl Street  
Glens Falls, NY 12801  
(518) 798-7555 ext 228

November 7, 2015

Letter of Appeal  
Schools & Libraries Division – Correspondence Unit  
100 South Jefferson Rd  
PO Box 902  
Whippany, NJ 07981

Appeal Reviewer:

This is a "Letter of Appeal" for Form 471 Application 1017603 with associated FRN's: 2761977, 2761988, 2761991, 2761995, 2762001, 2762003, 2811495

Case # 22- 862645

BEN and contact information:

Appellant Name:

Katherine Weiss, Authorized Representative  
Email: kweiss@erategroup.com  
Phone: 732-946-8300  
Fax: 732-879-0400

Applicant Name & BEN:

Name: **Warren**  
BEN: **16039188**

471 Reference & Funding Year:

Form 471: 1017603  
Funding Year: 2015

Text of Funding Commitment Decision Explanation:  
Information was not provided

Reason for Appeal and Documentation:  
Information was available – see below

**From:** "executivedirector@warrencountyheadstart.org"<executivedirector@warrencountyheadstart.org>  
**To:** Joseph Weiss <jweiss@erategroup.com>  
**Sent:** Wednesday, September 24, 2014 3:35 PM  
**Subject:** Re: Warren County

These answers are correct

Kathy Stewart  
Executive Director  
Warren County Head Start, Inc.  
11 Pearl Street  
Glens Falls, NY 12801  
(518) 798-7555 ext 228

**From:** "Joseph Weiss" <jweiss@erategroup.com>  
**Sent:** Wednesday, September 24, 2014 9:17 AM  
**To:** "Kathy Stewart" <executivedirector@warrencountyheadstart.org>, "Kathy Stewart" <kathys@warrencountyheadstart.org>  
**Subject:** Re: Warren County

**URGENT - Please confirm ASAP/TODAY via email to avoid your application from being denied that the ANSWERS listed below are correct (these are the same responses that supplied in the past).**

**The purpose of these questions is just to make sure that refunds are not being claimed for children under 3 years old. No other details other than what is already answered below is needed.**

**Question 1a refers to whether the Head Start belong to the school district and not a private organization. Therefore unless you are a school district, the answer is separate facility.**

**Question 2a refers to enrollment counts which has already been adjusted (if needed) to remove any students under the age of 3.**

**Question 3 refers to the students listed in question 2a that qualify for the lunch program which is 100% and listed on Block 4 of the funding application that was filed.**

**Question 4 asks for a cost allocation for your Funding Request which has already been done and is listed on Block 5 of your funding application that was filed.**

Listed below are the Head Start facility(ies):

<b>Entity</b>
16054631 GLENS FALLS/QUEENSBURY CENTER
16054632 ACC CHILDCARE CENTER
16054633 LAKE LUZERNE CENTER
16054634 WARRENSBURG CENTER
16054635 CHESTERTOWN CENTER/N WARREN CENTRAL HS
16065036 QUEENSBURY HEADSTART

Questions

To assist us in the review of your application, we need the following information regarding services for children under the age of three:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility and not part of a public school district**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under the age of 3**
  - b. If Yes, provide the enrollment count of students under the age of 3. **N/A**
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See the Block 4 of the FCC Form 471 that was filed.**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 5 of the FCC Form 471 that was filed.**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost

Specific Concerns in reference to this application: NA

471 – 1017603  
FRN Information:  
Funding Request Number: 2761977  
Service Provider: Cornerstone  
SPIN: 143026139

471 – 1017603  
FRN Information:  
Funding Request Number: 2761986  
Service Provider: Cornerstone  
SPIN: 143026139

471 – 1017603  
FRN Information:  
Funding Request Number: 2761991  
Service Provider: Frontier  
SPIN: 143001110

471 – 1017603  
FRN Information:  
Funding Request Number: 2761995  
Service Provider: Verizon Wireless  
SPIN: 143000677

471 – 1017603

FRN Information:  
Funding Request Number: 2762001  
Service Provider: Cornerstone  
SPIN: 143019523

471 – 1017603  
FRN Information:  
Funding Request Number: 2762003  
Service Provider: Cornerstone  
SPIN: 143019523

471 – 1017603  
FRN Information:  
Funding Request Number: 22811495  
Service Provider: Frontier  
SPIN: 143001110

A reversal of the denial of this funding request is sought. I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,  
*Katherine M. Weiss*  
Consultant

Exhibit IV  
1 of 3

**Subject:** Re: Pro Action of Steuben and Yates Inc. APP 1017517  
**From:** Katherine M. Weiss (kweiss@erategroup.com)  
**To:** Kevin.Bracken@sl.universalservice.org;  
**Date:** Monday, October 5, 2015 8:22 PM

ANSWERS BELOW

**Requested Discount**

**Issue**

Based on the review of your Funding Year **FY2015** FCC Form 471 application **1017517**, we have determined that the entity(ies) listed below that are included in your request for services appear to be Head Start facility(ies). In your state, facilities dedicated to Head Start instruction are eligible for funding. However, services for children under the age of 3 are not eligible for discounts in your state.

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/non-traditional/default.aspx>.

Listed below are the ineligible Head Start facility(ies):

Entity	Children Under 3 (Per Entity)
16041386 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM	
16041395 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM- MAIN OFFICE	
16041396 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM	
16041398 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM	
16041401 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM	
16041403 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM	
16041418 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM	
16041421 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM	
16041423 PRO ACTION OF STEUBEN & YATES HEAD START PROGRAM	

**Questions**

To assist us in the review of your application, we need the following information regarding services for children under the age of 3:

**Questions**

To assist us in the review of your application, we need the following information regarding services for children under the age of **three**:

1. Does the facility(ies) listed above include Head Start students? **YES**

- a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Entity(Facility) and not run by/(part of) a public school district**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under the age of 3**
  - b. If Yes, provide the enrollment count of students under the age of 3. **N/A**
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See the Block 4-Discount Calculation of the FCC Form 471 that was filed.**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 5-Discount Funding Requests of the FCC Form 471 that was filed.**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost
5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

### **Service Provider Issues**

#### *Issue*

Based on the review of your Funding Year **2015** FCC Form 471 application **1017517**, FRN 276176, you have cited **143023377** as your service provider. According to our records, the service provider that you have cited may not be eligible to provide telecommunications or voice services on a common carriage basis.

**Please change the SPIN on FRN's 2761796 & 281169 to 143046618**

Let me know if you need anything else.

E Rate Solutions Group

Phone - 732.946.8300 Fax - 732.946.8399

[www.erategroup.com](http://www.erategroup.com)

---

**From:** "Bracken, Kevin" <Kevin.Bracken@sl.universalservice.org>  
**To:** "kweiss@erategroup.com" <kweiss@erategroup.com>  
**Sent:** Monday, October 5, 2015 12:18 PM  
**Subject:** Pro Action of Steuben and Yates Inc. APP 1017517

Kevin Bracken  
PIA Reviewer  
Program Integrity Assurance

USAC, Schools and Libraries Division  
Phone: 973.581.5209  
E-mail: Kevin.Bracken@sl.universalservice.org

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Exhibit V

1055

**Subject:** Re: Regional Economic Communiyt Action program APP 1017565

**From:** Katherine M. Weiss (kweiss@erategroup.com)

**To:** Kevin.Bracken@sl.universalservice.org;

**Date:** Monday, October 5, 2015 6:45 PM

ANSWERS BELOW

**Requested Discount**

***Issue***

Based on the review of your Funding Year **FY2015** FCC Form 471 application **1017565**, we have determined that the entity(ies) listed below that are included in your request for services appear to be Head Start facility(ies). In your state, facilities dedicated to Head Start instruction are eligible for funding. However, services for children under the age of 3 are not eligible for discounts in your state.

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/beforeyoubegin/non-traditional/default.aspx>.

Listed below are the ineligible Head Start facility(ies):

Entity	Children Under 3 (Per Entity)
16045401 WESTERN ORANGE COUNTY HEADSTART - MIDDLETOWN SCHOOL	
16045405 WESTERN ORANGE COUNTY HEADSTART- SCOTCHTOWN SCHOOL	
16045406 WESTERN ORANGE COUNTY HEADSTART - PORT JERVIS SCHOOL	

***Questions***

---

**From:** Sharon Sabine <ssabine@recap.org>  
**To:** jweiss@erategroup.com  
**Cc:** Joya Gambino <jgambino@recap.org>; Lawrence Morici <lmorici@recap.org>  
**Sent:** Wednesday, September 17, 2014 1:29 PM  
**Subject:** FW: ERate Application 964254 for REGIONAL ECONOMIC COMMUNITY ACTION PROGRAM, INC. REMINDER

Hi Joseph,

The answers are correct. Please refer to the email below and let me know if the answers are not clear.

Thanks,  
Sharon Sabine

Sharon Sabine  
Head Start Director | RECAP, Inc.  
[ssabine@recap.org](mailto:ssabine@recap.org) | [www.recap.org](http://www.recap.org)  
Tel: (845)343-4191 x 6236 | Cell:



Please consider the environment before printing this e-mail

**From:** Sharon Sabine [mailto:[ssabine@recap.org](mailto:ssabine@recap.org)]  
**Sent:** Tuesday, September 16, 2014 11:29 AM  
**To:** 'Katherine M. Weiss'; Lawrence Morici  
**Cc:** Joya Gambino  
**Subject:** RE: ERate Application 964254 for REGIONAL ECONOMIC COMMUNITY ACTION PROGRAM, INC. REMINDER

Hi Katherine,

We do not serve children under 3. The center enrollments are correct for program year 2013-2014 but have now changed for 2014-2015 : Scotchtown enrollment is now 56 children (3-5 years); Port Jervis is 44 children (3-5 years) and Middletown is 84 children (3-5 years). 56 children in Scotchtown qualify for free lunch, 43 children in Port Jervis qualify for free lunch and 80 children in Middletown qualify for free lunch.  
The remaining answers to the questions are correct.

Thank you,  
Sharon

Sharon Sabine  
Head Start Director | RECAP, Inc.  
[ssabine@recap.org](mailto:ssabine@recap.org) | [www.recap.org](http://www.recap.org)  
Tel: (845)343-4191 x 6236 | Cell:



Please consider the environment before printing this e-mail

**From:** Katherine M. Weiss [mailto:[kweiss@erategroup.com](mailto:kweiss@erategroup.com)]  
**Sent:** Monday, September 15, 2014 4:24 PM  
**To:** Lawrence Morici  
**Cc:** [jgambino@recap.org](mailto:jgambino@recap.org); [ssabine@recap.org](mailto:ssabine@recap.org)  
**Subject:** Re: ERate Application 964254 for REGIONAL ECONOMIC COMMUNITY ACTION PROGRAM, INC. REMINDER

Here it is

Joseph J. Weiss  
E Rate Solutions Group  
Phone - 732.946.8300 Fax - 732.946.8399  
[www.erategroup.com](http://www.erategroup.com)

**From:** Lawrence Morici <[lmorici@recap.org](mailto:lmorici@recap.org)>  
**To:** Katherine M. Weiss <[kweiss@erategroup.com](mailto:kweiss@erategroup.com)>  
**Cc:** "[jgambino@recap.org](mailto:jgambino@recap.org)" <[jgambino@recap.org](mailto:jgambino@recap.org)>; "[ssabine@recap.org](mailto:ssabine@recap.org)" <[ssabine@recap.org](mailto:ssabine@recap.org)>  
**Sent:** Monday, September 15, 2014 1:15 PM  
**Subject:** Re: ERate Application 964254 for REGIONAL ECONOMIC COMMUNITY ACTION PROGRAM, INC. REMINDER

Can you please provide us with a copy of the 471? Also, there are no students under the age of 3, so i am not sure why our 3 facilities are listed as "ineligible".

Once we have the 471 we can confirm the information. Thank you.

Regards,

Lawrence Morici  
Director, Information Technologies | RECAP, Inc.  
[lmorici@recap.org](mailto:lmorici@recap.org) | [www.recap.org](http://www.recap.org)  
Tel: (845) 421-6258 | Cell: (845) 551-0896

On Sun, Sep 14, 2014 at 9:00 PM, Katherine M. Weiss <[kweiss@erategroup.com](mailto:kweiss@erategroup.com)> wrote:

**Please confirm that the following is correct so I can complete your application review - please include your title in your response.**

Also please send me a complete copy of your Fen or March 2014 Windstream bill.

I. **Eligibility of the Entities**

*Issue*

Based on the review of your Funding Year **14-15** FCC Form 471 application **964254** we have determined that the entity(ies) listed below that are included in your request for services appear to be Head Start facility(ies). In your state, facilities dedicated to Head Start instruction are eligible for funding. However, services for children under the age of 3 are not eligible for discounts in your state.

For further information regarding Head Start facilities, please refer to the USAC website at: <http://www.usac.org/sl/applicants/step01/non-traditional-K-12/>.

Listed below are the ineligible Head Start facility(ies):

<b>Entity</b>
WESTERN ORANGE COUNTY HEADSTART - MIDDLETOWN SCHOOL
WESTERN ORANGE COUNTY HEADSTART - PORT JERVIS SCHOOL
WESTERN ORANGE COUNTY HEADSTART- SCOTCHTOWN SCHOOL

*Questions*

To assist us in the review of your application, we need the following information regarding services for children under the age of **three**:

1. Does the facility(ies) listed above include Head Start students? **YES**
  - a. If Yes, is the Head Start facility(ies) a separate facility(ies), or part of an elementary or secondary school? **Separate Facility**
2. Please provide the Head Start enrollment (student count) that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - a. Does the enrollment count include students under the age of 3? **No attending Head Start Students are under 3**
  - b. If Yes, provide the enrollment count of students under the age of 3.
3. Please provide the Head Start students eligible (student count) for free and reduced lunch that are included in Block 4 of this FCC Form 471 for each facility mentioned above. **See Block 4/5**
4. For each FRN, please provide a dollar cost allocation or percentage of total cost for the services being provided to Head Start students. All cost allocations must be based on tangible criteria and reach a realistic result. **See Block 4/5**
  - a. Identify the ineligible student cost (students under the age of 3)
  - b. Identify the eligible student cost

5. Your response should be on a school letterhead, and be signed and dated by a chief school official (e.g. Principal, Superintendent). If responding via email, please provide the name and title of the chief school official providing the response.

E Rate Solutions Group

Phone - 732.946.8300 Fax - 732.946.8399

[www.erategroup.com](http://www.erategroup.com)

---

**From:** "Bracken, Kevin" <Kevin.Bracken@sl.universalservice.org>  
**To:** "kweiss@erategroup.com" <kweiss@erategroup.com>  
**Sent:** Monday, October 5, 2015 12:55 PM  
**Subject:** Regional Economic Communiyt Action program APP 1017565

Kevin Bracken  
PIA Reviewer  
Program Integrity Assurance  
USAC, Schools and Libraries Division  
Phone: 973.581.5209  
E-mail: Kevin.Bracken@sl.universalservice.org

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# Exhibit VI

**From:** "Kharva, Keyur" <keyur.kharva@sl.universalservice.org>  
**To:** Katherine M. Weiss <kweiss@erategroup.com>  
**Cc:** "Katherine Weiss@1-7329468399" <IMCEAFAX-Katherine+20Weiss+401-7329468399@solixinc.com>  
**Sent:** Monday, February 29, 2016 12:34 PM  
**Subject:** Apps 1022420 & 1030464 - THE IDEAL SCH OF MANHATTAN - Incomplete Response

Dear Katherine Weiss,

Please see attached.

1. Note that your response was incomplete because you did not provide sufficient documentation that supports the discount requested. Specifically, you provided the documentation stating the number of students enrolled and the number of students eligible for NSLP on a School Letterhead, but you did not provide the copy of a sample survey. See attached letter to learn more about what other options are available to provide acceptable documentation that supports the discount requested.
2. Please provide separate documentation for each entity (BENs # 16083321 and 16083322) showing total number of students enrolled (full-time or part time) to determine the Category Two Budget for these two entities. See issue listed under the subheading Category Two Budget on the attached letter for more details.

Kindly confirm receipt of this email.

Thank you,

**Keyur Kharva**

**Associate Case Manager – SLP Appeals**

T: 800.200.0818 ext. 7581 | Direct: 973.581.7581 | F: 973.599.6525

[Keyur.Kharva@sl.universalservice.org](mailto:Keyur.Kharva@sl.universalservice.org)

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