

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Request for Review of a	)	
Decision of Universal Service	)	CC Docket No. 02-6
Administrator	)	
	)	
By AT&T Corp.	)	

**REQUEST FOR REVIEW**

Pursuant to section 54.719(b) of the Commission’s rules, 47 C.F.R. § 54.719(b),<sup>1</sup> AT&T Services, Inc. on behalf of its affiliate, AT&T Corp. (“AT&T”) hereby requests review of the decision of the Universal Service Administrative Company (“USAC” or “the Administrator”) to seek recovery from AT&T of \$28,577.20 in E-Rate program funding granted to the West Point School District (“West Point” or “Applicant”) in the 2011 funding year (“FY2011”).<sup>2</sup> During its Program Quality Assurance (PQA) review of the Applicant, USAC found that the Applicant failed to provide proof of reimbursement from the service provider. After USAC concluded its PQA with the Applicant, *but before requesting any such documentation from AT&T*, USAC sent a Notice of Improperly Disbursed Funds Recovery Letter (“Notice”) to AT&T seeking recovery of \$28,577.20.<sup>3</sup> Upon receipt, AT&T appealed the Notice to the Administrator and provided documentation demonstrating that AT&T provided E-rate discounts to the Applicant, totaling the

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<sup>1</sup> See 47 C.F.R. §54.719(b).

<sup>2</sup> See Letter dated January 22, 2016, Universal Service Administrative Company to Lorraine Griffin, AT&T, Administrator’s Decision on Appeal. (Attachment A) (On January 27, 2016, AT&T also received a Demand Payment Letter from USAC seeking payment of \$28,577.20. On March 8, 2016, AT&T paid the amount demanded; however if this appeal is granted, AT&T expects that payment to be refunded).

<sup>3</sup> See Letter dated July 27, 2015, Universal Service Administrative Company to Lorraine Griffin, AT&T Notification of Improperly Disbursed Funds Recovery Letter.

above-referenced amount, for services provided in FY2011. Nevertheless, on January 22, 2016, the Administrator summarily denied AT&T's appeal, stating that "USAC could not determine that the applicant received reimbursement from the service provider, either through a check or credit on a bill," and took this action without providing any explanation as to why the documentation that AT&T provided was insufficient. AT&T disputes the Administrator's finding and submits its explanation and supporting documentation for Commission review.

AT&T's documentation demonstrates that E-Rate discounts were provided to West Point. On November 16, 2012, USAC issued a Funding Commitment Decision Letter approving West Point's funding request for Internet Access services provided by AT&T for FY2011.<sup>4 5</sup> On March 26, 2013, West Point selected the AT&T Reimbursement Form ("ARF") process to receive its E-rate discounts.<sup>6</sup> On March 26<sup>th</sup> and 27<sup>th</sup>, 2013, AT&T applied the E-rate discounts to the Internet access services on West Point's bills dated October 2011 – May 2012, which totaled \$28,577.20.<sup>7</sup> AT&T's ARF system, then, generated a check made payable to West Point's billing account in the amount of the discounts, and the check was posted to West Point's account and noted on West Point's May, 2013 bill as a payment.<sup>8</sup> Thus, AT&T applied E-rate discounts to West Point's account in the form of a bill payment and, ultimately, West Point only paid its non-discounted portion for services provided in FY2011.

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<sup>4</sup> See USAC Data Retrieval Tool.

<sup>5</sup> The last day to submit invoices to USAC for E-rate discounts for FY2011 was April 18, 2013.

<sup>6</sup> See Electronic Notification file (Attachment B) (AT&T notes that Attachment B is in a non-standard format as these are print-outs of electronic notifications).

<sup>7</sup> *Id.*

<sup>8</sup> See AT&T Invoice to West Point Schools, dated May 5, 2013 (See Payment Section @ Bill-At-A-Glance – Payment – Thank you! \$28,577.20CR) (Attachment C). *And See* Check No. 95411602, dated April 2, 2013, Payable to AT&T Account 831-000-2493-219 in the amount of \$28,577.20 (Attachment D).

The Commission has previously reviewed and found AT&T's ARF process to comply with the Commission's rules.<sup>9</sup> As AT&T stated in its *Petition*,<sup>10</sup> the AT&T ARF process gives applicants the option of paying the non-discounted portion of the costs of services, with AT&T seeking reimbursement for the E-rate discount from USAC. The Commission agreed and held that

under AT&T's billing process, the applicant is not required to pay more than the non-discounted portion of the requested services to USAC from its own funds because AT&T covers the amount of the discounted portion pending reimbursement from USAC. Thus, the net effect is that the only cash outlay from the applicant's own funds is the amount necessary to pay the non-discounted portion of the services as required by section 54.523 of the Commission's rules.<sup>11</sup>

This is the same process AT&T used to provide E-rate discounts to West Point. As discussed above, this process allowed West Point the option of only paying the non-discounted portion while AT&T obtained reimbursement from USAC. Thus, Commission should reverse USAC's erroneous finding and confirm that AT&T provided E-rate discounts to West Point in compliance with E-rate program requirements.

Respectfully submitted,

AT&T Services, Inc.

By: /s/Terri L. Hoskins

Terri L. Hoskins  
Christopher Heimann  
Gary L. Phillips  
David Lawson  
AT&T Services, Inc.  
1120 20<sup>th</sup> Street NW, Suite 1000  
Washington, DC 20036

March 21, 2016

*Its Attorneys*

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<sup>9</sup> See AT&T Petition for Clarification or, in the Alternative, Waiver of Section 54.514(a) of the Commission's Rules, *Order*, DA 07-1272, CC Docket 02-6 (rel. March 13, 2007) ("*ARF Order*").

<sup>10</sup> See AT&T Petition for Clarification or, in the Alternative, Waiver of Section 54.514(a) of the Commission's Rules, CC Docket 02-6 (filed July 21, 2003).

<sup>11</sup> *ARF Order* at ¶ 4.

**CERTIFICATE OF SERVICE**

I, Loretia Hill, certify that I have, on March 21, 2016, served a copy of the foregoing Request for Review by U.S. Mail postage prepaid to the address below:

/s/Loretia Hill

Loretia Hill

Schools and Libraries Program Correspondence Unit  
Attention: Letter of Appeal  
30 Lanidex Plaza West, PO Box 685  
Parsippany, NJ 07054-0685

# ATTACHMENT A

RECEIVED  
JAN 22 2016



Universal Service Administrative Company  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2011-2012**

January 22, 2016

Lorraine A. Griffin  
AT&T  
311 West Washington Blvd/, Flr 16  
Chicago, IL 60606

Re: Applicant Name: WEST POINT SCHOOL DISTRICT  
Billed Entity Number: 128736  
Form 471 Application Number: 788360  
Funding Request Number(s): 2396400  
Your Correspondence Received: September 14, 2015

After thorough review and investigation of all relevant facts, 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 Year 2011 Notification of Improperly Disbursed Funds Recovery Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2396400  
Decision on Appeal: **Denied**  
Explanation:

- During a Payment Quality Assurance (PQA) review, the applicant failed to provide the following requested documentation: proof of reimbursement from the service provider.

USAC could not determine that the applicant received reimbursement from the service provider, either through a check or credit on a bill. If USAC is invoiced via a FCC Form 472, program rules require that the service provider must remit payment of the approved discount from the fund administrator no later than 20 business days after receipt of that reimbursement. If USAC is invoiced via an FCC Form 474, program rules require that service providers render a discounted bill to the billed entity. Since program rules were violated, USAC will seek recovery of any improperly disbursed funds from the service provider.

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

cc: Chris Carter

# ATTACHMENT B

IDSENDER SUBJECT RECIPIENT MESSAGE DATE\_SENT FRN 21579erate.legt@att.com AT&T E-Rate FRN (2396400) Account Profile Status: On Hold chris.carter@westpoint.k12.ms.us  
 Thank you for submitting your AT&T E-Rate Customer Account Profile. AT&T is currently processing your submission. If additional information is required, our E-Rate office will contact you directly.

Thank you,  
 AT&T E-Rate Office  
 866-364-3317

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2013-03-13 10:06:47.347239640023284erate.legt@att.com AT&T E-Rate FRN (2396400)  
 Account Profile Approval and Discount Selection Options chris.carter@westpoint.k12.ms.us

	
<p><b>AT&amp;T National E- Rate Center of Excellence</b></p>	<p><b>225 W. Randolph                  FLR 22A                  Chicago, IL 60606                  866-364-3317</b></p>

Dear WEST POINT SCHOOL DISTRICT,

Thank you for completing and submitting your AT&T E-Rate Customer Account Profile. Your profile has been validated and you may now make your E-Rate discount method selection for the following FRN.

**Funding Request Number (FRN): 2396400**

AT&T is pleased to offer two options for requesting your AT&T E-Rate Funding Year 2011 discount:

1. Schools and Libraries Division (SLD) BEAR process
2. Online AT&T Reimbursement Form (ARF)

You will need to select one option for requesting your E-Rate discounts. To help you with this decision, we have put together Q&As on AT&T's E-Rate process and provided a demo of the AT&T Reimbursement Form (ARF) on our web site. Please visit our web site at <http://www.erate.att.com/> for more information.

It is **important** to understand that once you select a payment option and use that method, you will be required to submit all of your payment requests using this method. The SLD will not allow dual payment methods for a single Funding Request Number (FRN).

**Discount Option Descriptions:**

**ARF (AT&T Reimbursement Form) Method:**

ARF web site location: <http://www.erate.att.com>

If you choose to use the online ARF method to request your reimbursements, you will need to use the initial logon Personal Identification Number (PIN) we have provided in your Welcome Letter to access the ARF web site. Once you have logged on to the ARF web site, it will guide you through the payment process screen by screen. You will be provided the option to change your PIN at any time to one that is more meaningful and easy to remember.

Along with your log on PIN, you will also need the following items when you are ready to access and input into the ARF web site:

1. **Billed Entity Number:** This can be found on your 471 Funding Commitment Decision Letter
2. **Funding Request Number(s) (FRNs):** Funding Requests Number(s) can be found on your 471 Funding Commitment Decision Letter.
3. **Bills/Invoices:** You may only request reimbursement on billed eligible charges. **You will need to refer to your bills/invoices to input eligible amounts and applicable bill dates into the ARF system.** Please retain copies of your bills/invoices as all E-Rate disbursements are subject to audit.

**\* Note: If any changes are required to your user profile or reimbursement request, please contact us at [aterate.legt@att.com](mailto:aterate.legt@att.com).**

#### **BEAR (Billed Entity Applicant Reimbursement) Method:**

The BEAR process is a reimbursement process designed to provide your e-rate benefits in the form of a check. The applicant is required to pay their bill in full and submit to USAC the FCC Form 472. After the payment request has been submitted, it goes to invoice review. Upon approval, the Service Provider will be directed to pay the customer the benefits to which they are entitled. This process will take approximately 60 days from start to finish. Additional information on the BEAR process can be found at <http://www.usac.org/sl/tools/required-forms.aspx>.

The Schools and Libraries Division provides the ability to process your BEAR online which offers the following advantages:

- System checks for errors and notifies you if data is missing or inconsistent
- Invoice review process can begin soon after all required information is submitted online
- Receive by email a copy of the Service Provider notification of your BEAR filing

**Please visit the SLD web site for details: <http://www.universalservice.org/sl/tools/required-forms/form472-instructions.aspx>**

If you have any questions or concerns please feel free to contact the AT&T National E-rate Service Center at [erate.legt@att.com](mailto:erate.legt@att.com) or at 866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday.

AT&T looks forward to serving your telecommunications needs and providing you with World Class Service today and in the future.

**Linda Doyle**  
**Manager, AT&T National E-Rate Center of Excellence**

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2013-03-26 21:41:51.337239640023287erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: October 2011

AT&T has applied your E-Rate discount in the amount of \$1,285.40 for October 2011 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

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2013-03-27 10:45:13.917239640023288erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: November 2011

AT&T has applied your E-Rate discount in the amount of \$3,376.19 for November 2011 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

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2013-03-27 10:45:13.95239640023289erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: December 2011

AT&T has applied your E-Rate discount in the amount of \$3,376.19 for December 2011 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

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2013-03-27 10:45:13.977239640023290erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: January 2012

AT&T has applied your E-Rate discount in the amount of \$3,376.19 for January 2012 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

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2013-03-27 10:45:13.997239640023291erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: February 2012

AT&T has applied your E-Rate discount in the amount of \$3,376.19 for February 2012 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

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2013-03-27 10:45:14.017239640023292erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: March 2012

AT&T has applied your E-Rate discount in the amount of \$3,640.54 for March 2012 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

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2013-03-27 10:45:14.037239640023293erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: April 2012

AT&T has applied your E-Rate discount in the amount of \$3,299.20 for April 2012 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

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2013-03-27 10:45:14.057239640023294erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: May 2012

AT&T has applied your E-Rate discount in the amount of \$3,423.65 for May 2012 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

AT&T looks forward to serving your telecommunications needs and providing you with World Class Service today and in the future.

Thank you.

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2013-03-27 10:45:14.073239640023295erate.legt@att.comAT&T E-Rate

Confirmationchris.carter@westpoint.k12.ms.us

Applicant: WEST POINT SCHOOL DISTRICT

FRN: 2396400

Invoice Months: June 2012

AT&T has applied your E-Rate discount in the amount of \$3,423.65 for June 2012 directly to account number 831-000-2493 219 which will appear as a payment on your next month's billing statement.

If you have any questions or concerns, please feel free to contact the AT&T National E-rate Service Center at 1-866-364-3317 between 8:00 AM and 5:00PM (EST) Monday through Friday or email [erate.legt@att.com](mailto:erate.legt@att.com).

AT&T looks forward to serving your telecommunications needs and providing you with World Class Service today and in the future.

Thank you.

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2013-03-27 10:45:14.0932396400

# ATTACHMENT C

West Point Schools  
10000 W. 110th St.  
Overland Park, MO 66204

Page 1 of 2  
Account Number 831-000-2493 219  
Billing Date May 5, 2013  
Questions? 1 800 235-7524  
Web Site att.com  
Invoice 5465770206

# Invoice

### Bill-At-A-Glance

Previous Bill	64,474.65
<b>Payment - Thank You!</b>	<b>28,577.20CR</b>
Adjustments	.00
Past Due - Please Pay Immediately	35,897.45
Current Charges	28,824.71CR
<b>Total Amount Due</b>	<b>\$7,072.74</b>
Current Charges Due in Full by	<b>May 30, 2013</b>

#### Group #000001

One Time Charges:  
 Service Order: N57834120130412065502  
 Completion Date: Apr 12, 2013  
 3. E-Rate Disbursement 3,462.12CR  
 SPIN 143001192 FRN 2285280  
 09-05-2012 Invoice  
 Qty:1.00 Items at 3,462.12 CR  
 Service Order: N57834220130412065502  
 Completion Date: Apr 12, 2013  
 4. E-Rate Disbursement 3,462.12CR  
 SPIN 143001192 FRN 2285280  
 10-05-2012 Invoice  
 Qty:1.00 Items at 3,462.12 CR  
 Service Order: N57834320130412065503  
 Completion Date: Apr 12, 2013  
 5. E-Rate Disbursement 3,462.12CR  
 SPIN 143001192 FRN 2285280  
 11-05-2012 Invoice  
 Qty:1.00 Items at 3,462.12 CR

### Billing Summary

For detailed information of your charges go to  
[www.businessdirect.att.com](http://www.businessdirect.att.com)

Questions? Call: 1 800 235-7524

<b>AT&amp;T Business Services</b>	
Account/Group Charges	29,527.20CR
Total Account/Group Charges	29,527.20CR
<b>Group #000001</b>	
Sub-Account #831-000-2493 220	702.49
Total Group #000001	702.49
<b>Total Current Charges</b>	<b>28,824.71CR</b>

Service Order: N57834420130412065503  
 Completion Date: Apr 12, 2013  
 6. E-Rate Disbursement 3,462.12CR  
 SPIN 143001192 FRN 2285280  
 12-05-2012 Invoice  
 Qty:1.00 Items at 3,462.12 CR  
 Service Order: N57834520130412065503  
 Completion Date: Apr 12, 2013  
 7. E-Rate Disbursement 3,462.12CR  
 SPIN 143001192 FRN 2285280  
 01-05-2013 Invoice  
 Qty:1.00 Items at 3,462.12 CR  
 Service Order: N57834620130412065504  
 Completion Date: Apr 12, 2013  
 8. E-Rate Disbursement 3,462.12CR  
 SPIN 143001192 FRN 2285280  
 02-05-2013 Invoice  
 Qty:1.00 Items at 3,462.12 CR  
 Service Order: N57834720130412065504  
 Completion Date: Apr 12, 2013  
 9. E-Rate Disbursement 1,830.24CR  
 SPIN 143001192 FRN 2285280  
 03-05-2013 Invoice  
 Qty:1.00 Items at 1,830.24 CR  
 Total E-Rate Disbursements 29,527.20CR  
 Total Account/Group Charges 29,527.20CR

### Current Charges

#### Account/Group Charges

#### E-Rate Disbursements

One Time Charges:  
 Service Order: N57833920130412065502  
 Completion Date: Apr 12, 2013  
 1. E-Rate Disbursement 3,462.12CR  
 SPIN 143001192 FRN 2285280  
 07-05-2012 Invoice  
 Qty:1.00 Items at 3,462.12 CR  
 Service Order: N57834020130412065502  
 Completion Date: Apr 12, 2013  
 2. E-Rate Disbursement 3,462.12CR  
 SPIN 143001192 FRN 2285280  
 08-05-2012 Invoice  
 Qty:1.00 Items at 3,462.12 CR

Return bottom portion with your check in the enclosed envelope.

**DUE BY: May 30, 2013 \$7,072.74**

Billing Date May 5, 2013

Account Number **831-000-2493 219**

Please include your account number on your check

West Point Schools

10000 W. 110th St.  
Overland Park, MO 66204

Make checks payable to:

AT&T  
P.O. Box 5019  
Carol Stream, IL 60197-5019



83100024932195465770206078200000070727400028824712

**Current Charges**

**Group #000001**  
**Sub-Account #831-000-2493 220 West Point Schools**  
**Customer Location:**  
 [REDACTED]  
**Charges for Subscriber/Router ID 7521799**  
 [REDACTED]  
**IP Optional Components**  
 Prorated Charges:  
 Service Order: D4759650  
 Service Ordered by: HARRY BAXTER  
 Contact Number: 1-601-718-7932  
 Completion Date: Apr 20, 2013  
 1. MIS Access Charge 628.13CR  
     Services Removed  
     Apr 21, 2013 thru May 4, 2013  
     Qty: 1.00 Items at 1,346.00 CR x Factor: .466667  
 Total IP Optional Components 628.13CR  
**MIS with Managed Router**  
 Prorated Charges:  
 Service Order: D4759650  
 Service Ordered by: HARRY BAXTER  
 Contact Number: 1-601-718-7932  
 Completion Date: Apr 20, 2013  
 2. 50 Mbps Hi Cap Flex Bandwidth 1,333.76  
     Commitment  
     Apr 5, 2013 thru Apr 20, 2013  
     Qty: 1.00 Items at 7,815.00 x Factor: .533333  
     Gross: 4,168.00  
     MIS Discount for Flex-Burstable Gigabit Ethernet 2,834.24CR  
 Total MIS with Managed Router 1,333.76  
**Surcharges and Other Fees**  
 3. Federal Access Recovery Fee 3.14CR  
 Total Surcharges and Other Fees 3.14CR  
 Total Subscriber/Router ID 7521799 702.49  
**Total Sub-Account #831-000-2493 220 702.49**  
**Total Group #000001 702.49**

**Total Current Charges 28,824.71CR**

**News You Can Use**

**News You Can Use**

**ACCOUNT STATUS**  
 Where allowed by law, AT&T may implement late payment interest of no more than 18% annually. Rates will vary based on state regulations. Interest will be calculated based upon daily balances and will be applicable for each day that a delinquent balance is outstanding. This charge will apply to all balances that are delinquent through such time that payment in full is received at AT&T. The late payment interest will be billed on a monthly basis. Accounts billed outside the US will not be charged LPI.

Where allowed by law, AT&T may implement a \$25 service fee for restoration of service where delinquency has caused an interruption. This fee will be applicable to each account that is being restored and will be included on your monthly billing statement.

**News You Can Use**

**ACCOUNT STATUS - Continued**

Attention customers: AT&T will charge a \$25 fee for any check returned for insufficient funds, applied on your next invoice. AT&T values your business and thanks you for your cooperation in this matter.

Some products require electronic billing as their official bill media. When electronic billing is the official bill media, an informational statement may be sent containing some of the same information as the electronic bill. The informational statement is not your bill. However, if you choose to mail your payment instead of paying electronically, the informational statement has a tear-off that can be used to submit your payment.

**REGULATORY NEWS**  
 Attention California Customers:

The following charges are "Government Fees and Taxes": Federal Excise Tax; CHCF-A, CHCF-B, Univ Lifeline Tele Serv Sur, Com Dev Fnd/Deaf & Disabled, California Teleconnect Fund, State 9-1-1 Surcharge, Utility User's Tax, and Local 911 Charge..

Thank You For Choosing AT&T Where Every Customer Counts!

# ATTACHMENT D

ATTACHMENT D

Acct #: 971782

Check #: 95411602

Amount: 28,577.20

Seq#: 5980955134

THE BACK OF THIS CHECK CONTAINS A SECURITY MARK - DO NOT ACCEPT WITHOUT HOLDING

VERIFY SECURITY MARK



JPMorgan Chase Bank, N.A.  
Chicago, IL

70-2322719

Date  
04/02/2013

Check Number  
95411602

Pay this amount  
\$28,577.20

PAY  
TWENTY-EIGHT THOUSAND, FIVE HUNDRED SEVENTY-SEVEN AND 20/100\*\*\*\*\*

To the order of

AT&T acct 831-000-2493 219  
AT&T acct 831-000-2493 219  
P.O. Box 5019  
Carol Stream, IL 60197



Security Features  
Details on Back

Void 180 days from check date

⑈95411602⑈

⑆071923226⑆

000971782⑈

34505041

FEDERAL RESERVE BANK REGULATION CC

Product design is a certification mark of Check Payment Systems Association

- Document Security
- Toner Reduction
- Micro Printing
- Chemically Sensitized Paper
- Security Mark - Hold at angle to view

008 040813 328555 0 8310002493219  
002493219 28577.20 For Deposit Only  
582 328555 UVER AT&T JPMC  
004 00 05 01 004 Chicago IL >021000021<

DO NOT WRITE, STAMP OR ENDORSE BELOW THIS LINE

HOLD AT ANGLE TO VIEW SECURITY MARK  
DO NOT ACCEPT IF SECURITY MARK IS ABSENT.  
ENDORSE HERE