

Collect - Ed LLC

PO Box 333
Mustang, OK 73064
Ph: 405.830.2200 Fax: 405.376.7237
eFax: 501.640.7815
www.collect-ed.com

May 6, 2016

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

**ATTENTION:
APPEAL**

12 pgs

RE: **CC Docket No. 02-6**

Dear FCC APPEALS DEPARTMENT:

This is a letter of appeal based on USAC decision of E-Rate funding. We would appreciate your earliest attention for this issue.

**ITEM #1
LETTER OF APPEAL**

**ITEM #2
CONTACT INFORMATION:**

BEN	140496
SCHOOL	EDGEWOOD INDEP SCH DISTRICT
E-RATE CONSULTANT:	Machelle L. McKay
CONSULTING COMPANY	COLLECT-ED LLC
CONSULTANT PHONE:	(405) 830-2200
CONSULTANT FAX:	(405) 376-7237 OR (501) 640-7815
CONSULTANT EMAIL:	collect-ed@hotmail.com

**ITEM #3
IDENTIFY THE USAC ACTION FOR APPEAL**

REWRITE AND CLARIFICATION OF APPEAL FILED 1/18/2016:

APPEAL – FORM 471 # 1000541 FCDL decision
Request to reconsider USAC funding request for FRN# 2723575.
By allowing FORM 471 correction under the Ministerial and clerical (M&C) errors rule, the category of services from Internet Access Services (CAT1) to MANAGED INTERNAL BROADBAND SERVICES (CAT2).

ITEM #4**BILLED ENTITY NUMBER, BILLED ENTITY NAME AND FORM OR APPLICATION NUMBER**

BILLED ENTITY #:	140496
BILLED ENTITY NAME:	EDGEWOOD INDEP SCH DISTRICT
471 Application #	1000541
FRN	2723575
SERVICE PROVIDER:	Edu-Net LLC
SPIN#	143033794

ITEM #5**EXPLAIN THE APPEAL AND INCLUDE COPIES OF ALL RELEVANT DOCUMENTATION.**

Request to reconsider USAC funding request for FRN# 2723575.

By allowing FORM 471 correction under the Ministerial and clerical (M&C) errors rule, the category of services from Internet Access Services (CAT1) to MANAGED INTERNAL BROADBAND SERVICES (CAT2).

This correction will properly reflect the services delivered to Edgewood ISD. See attached email (9/3/2015) from service provider, EDU-NET LLC; defining services, description of their charges and diagram of service.

ITEM #	ATTACHMENT	PAGES
A	LETTER OF AUTHORIZATION – EDGEWOOD ISD	1
B	FCDL – FRN# 2723575	1
C	471# 1000541 – FRN# 2723575	4
D	Item #21 – Service provider documentation (invoice & contract)	2
E	Email from Service provider, provided during PIA review Defining Types of charges and diagram of services delivered	2

ITEM #6**AUTHORIZED SIGNATURE**

If you have any questions or concerns, please contact me at your earliest convenience.

Machelle McKay
COLLECT-ED
E-Rate Consultant

Lori Robert
EDGEWOOD INDEP SCH DISTRICT
Technology Director

CC: EDGEWOOD INDEP SCH DISTRICT

EDGEWOOD INDEPENDENT SCHOOL DISTRICT

804 E. Pine ~ Edgewood, TX ~ 75117 ~ Office - 903.896.4332 ~ Fax - 903.896.7056 ~ www.edgewood-isd.net

Go Bulldogs!

May 17, 2014

To whom it may concern:

E-Rate Consultant, Machelie L. McKay DBA Collect – Ed, LLC is assisting **EDGEWOOD INDEP SCH DISTRICT (BEN# 140496)** in the processing and collection of our E-rate Program for funding year 2015-2016.

Please use this letter as your authorization to provide the necessary information as requested by Collect - Ed LLC concerning this effort. For example, but not limited to:

- E-Rate application information (470, 471, 486 and 472);
- Vendor account information including on-line billing access, (for E-Rate purposes only);
- Vendor E-Rate Form signatures (472, Block 4)
- Authorized Signature may be used on electronic forms.
- Etc. (any other information necessary for E-Rate purposes).

I, certify that our school district respects and complies with any and all the rules and regulations of the Universal Service Administrative Company (USAC). Including form certifications: 470, Block 5; 471, Block 6; 486, Block 4; 472, Block 3

Thank you for your assistance.



Authorized Signature

Andy Baker

Printed Name

Superintendent of Schools, Edgewood ISD

Title

7-10-14

Date

FUNDING COMMITMENT REPORT
Billed Entity Name: EDGEWOOD INDEP SCHOOL DISTRICT
BEN: 140496
Funding Year: 2015

Comment on RAL corrections:
The applicant did not submit any RAL corrections.

FCC Form 471 Application Number: 1000541
Funding Request Number: 2723575
Funding Status: Not Funded
Service Type: Internet Access
FCC Form 470 Application Number: 464040001165742
SPIN: 143033794
Service Provider Name: Edu-Net , LLC
Contract Number: 2014-2018 HOST HOTSPOT SVCS
Billing Account Number: EDGEWOOD-IA-HOTSPOTS
Service Start Date: 07/01/2015
Service End Date: N/A
Contract Award Date: 03/18/2014
Contract Expiration Date: 06/30/2019
Shared Worksheet Number:
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$35,221.20
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$583.10
Pre-discount Amount: \$35,804.30
Discount Percentage Approved by the USAC: 70%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision Explanation: DR1: Thirty percent or more of this FRN includes a request for Leased Access Points as part of a IA service, which is ineligible based on Program rules.

FCDL Date: 12/11/2015
Wave Number: 028
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2016
Consultant Name: Machelie McKay
Consultant Registration Number (CRN): 16062522
Consultant Employer: COLLECT-ED LLC

USAC appeal
FCC waiver requested

Applicant: EDGEWOOD INDEP SCHOOL DISTRICT
Billed Entity Number: 140496
Date Submitted: Feb 17, 2015

Application Number: 1000541
Nickname: 471-2015-EDGEWOOD-C1
Date Certified: Feb 17, 2015

Original Form Data

Current Form Data

Basic Information

Expand All Collapse All Scroll to Top

Billed Entity

Name of Billed Entity: EDGEWOOD INDEP SCHOOL DISTRICT
Billed Entity Number: 140496
FCC Registration Number: 0013016860
Address 1: 804 EAST PINE
City: EDGEWOOD **State:** TX **Zip Code:** 75117
Telephone Number: (903) 896-4773 **Ext:** None Provided
Fax Number: (903) 896-7056

Application Type and Recipients of Service

Type of Application: District
Recipients of Services: Public

Submitter's Email Address: collect-ed@hotmail.com

Contact Information

Consultant Registration Number: 16062522
Consultant Name: Machelley McKay
Is a consultant acting as the contact person for this application? No
Contact Person's Name: Lori Robert / Machelley McKay
Contact Person's Email Address: collect-ed@hotmail.com
Is the contact person's address the same as that of the Billed Entity? No
Contact Person's Address: PO Box 333
City: Mustang **State:** OK **Zip Code:** 73064
Contact Person's Telephone Number: (405) 830-2200 **Ext:** None Provided
Contact Person's Fax Number: (501) 640-7815
Correspondence Address: Consultant Address
Name of person to receive correspondence: Lori Robert / Machelley McKay
Holiday / Summer Contact Information: Machelley McKay, Consultant

Discount Calculation

Expand All Collapse All Scroll to Top

Funding Request Category: Category 1

EDGEWOOD INDEP SCHOOL DISTRICT - 140496

Connectivity Questions

Funding Requests

Expand All Collapse All Scroll to Top

ATT-TC#7133 - 2723201

EDU-TC-HOST PBX - 2723221

EDU-TC-T1 - 2723241

EDU-IA-HOTSPOTS - 2723575

Key Information

Duplicate Funding Request Number:

Service Type: INTERNET ACCESS

Form470 Number: 464040001165742

Exempt470 Reason:

SPIN (Service Provider Identification Number): 143033794

SPIN Name: Edu-Net , LLC

Billing Account Number: EDGEWOOD-IA-HOTSPOTS

Does your contract have any voluntary extensions? No

How many extensions are left on the contract?

What is the total remaining length of the contract if you exercised all extensions (in months)?

Is this Funding Request covered under a master contract? No

Is this Funding Request a continuation of an FRN from a previous funding year based on a multi-year contract? Yes

Previous FRN Number: 2685166

*misc error
managed
internal broadband
services (CATZ)*

Purchase Type: CONTRACT
Contract Number: 2014-2018 HOST HOTSPOT SVCS
What is the date you awarded your contract? 03/18/2014
What is the date your contract expires? 06/30/2019
When will the services start? 07/01/2015

Narrative:
 Wireless Internet Access - HOTSPOTS district wide
Is there a statute, rule, or other restriction which prohibits publication of the pricing information? No
Type of restriction:
Restriction Citation:

Item 21 Details

FRN Line Item Number	Service Type	Product Type	Purpose	Lines	Upload Speed	Burst Bandwidth?	Last Mile?	Firewall?	Monthly Cost Eligible	One Time Cost Eligible	Extended Cost
					Download Speed	Burst Speed		WAN?	Ineligible	Ineligible	
1	Wireless Service	Data Plan/Air Card Service	Transport and Internet	98	100Mbps	No	No	No	\$2,935.10	\$583.10	\$35,804.30
					100Mbps			No	\$0.00	\$0.00	

Item 21 Details

Funding Request Summary

Total Post Discount Request: \$25,063.01

Monthly Charges

Total Charges:	\$2,935.10	(monthly)
Ineligible charges:	- \$0.00	(monthly)
Eligible monthly pre-discount amount:	\$2,935.10	
Total number of months of service:	x 12	
Total annual recurring charges:	\$35,221.20	

Total One-time Charges

Total Charges:	\$583.10
Ineligible charges:	- \$0.00
Eligible annual pre-discount amount:	\$583.10

Total Requested Amount

Total eligible charges:	\$35,804.30
Discount Rate:	x 70%
Funding Commitment Request:	\$25,063.01

EDU-IA-HOTSPOTS - 2723575

EDU-IA-100MB - 2723497

ATT-LD#2793 - 2723208

EDU-TC-DTS - 2723237

I certify that the entities listed in Block 4 of this application are eligible for support because they are:

✓ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or

✓ I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

A	Total funding year pre-discount amount on this FCC Form 471	\$465,534.54
B	Total funding commitment request amount on this FCC Form 471	\$311,623.21
C	Total applicant non-discount share	\$153,911.33
D	Total budgeted amount allocated to resources not eligible for E-rate support	\$232,628.67
E	Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resource necessary to make effective use of the discounts	\$386,540.00

Check this box if you are receiving any of the funds in Item E directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Item E.

✓ I certify that an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

✓ I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

✓ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. §§ 54.500, 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

✓ I certify that I and the entity(ies) I represent have complied with all program rules, including recordkeeping requirements, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

✓ I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

✓ I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification), after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

✓ I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

✓ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

✓ I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504(g)(1), (2).

✓ I certify that the non-discount portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services featured on this FCC Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

Authorized Person

Name of authorized person: Lori Robert

Title or position of authorized person: Technology Director

Street address, P.O. Box or Route Number of authorized person (1):

804 E Pine St

Street address, P.O. Box or Route Number of authorized person (2):

City of authorized person: Edgewood

State: TX

Zip code of authorized person: 75117

Telephone number: (903) 896-1432

Ext.: 8004

Fax number of authorized person: (903) 896-7056

Email address of authorized person: lrobert@edgewood-isd.net

Name of authorized person's employer: Edgewood Indep School District

[Back](#)

Edu-Net LLC

Service Order Form

Date of Order	Tuesday July 01, 2014
RWN Service Order #	03182014201-4
Customer P.O.#	
Effective Date	Tuesday July 01 2014
Sales Executive	Nabors

I. CUSTOMER Information

Customer Name	Billing Address (Street or P.O. Box)	City	State	Zip Code
Edgewood ISD	604 E. Pine	Edgewood	Texas	75117
	Street Address (# different from Billing Address)	City	State	Zip Code
Order Contact Name	Title	Phone Number	Fax Number	Email Address
Lori Robert	Technology Director	903-896 1432		robert@edgewoodisd.net

II. Order Information

Service	Service Notes	Quantity	Term	ARC Annual	NRC Installation	MRC Monthly
1. Select Service	Hot Spot (98)	1	5 Years	\$583.10	\$2,935.10	\$2,935.10
2. Select Service	Price may vary depending on initial quantities	0	Select	\$0.00	\$0.00	\$0.00
3. Select Service		0	Select	\$0.00	\$0.00	\$0.00
4. Select Service		0	Select	\$0.00	\$0.00	\$0.00
5. Select Service		0	Select	\$0.00	\$0.00	\$0.00
6. Select Service		0	Select	\$0.00	\$0.00	\$0.00
7. Select Service		0	Select	\$0.00	\$0.00	\$0.00
8. Select Service		0	Select	\$0.00	\$0.00	\$0.00
Total				\$583.10	\$2,935.10	\$2,935.10

III. Service Locations - for location based services include Service Locations Form

Service Locations Form Attached

IV. Total Charges Summary

	MONTHLY RECURRING	ANNUALLY RECURRING	NONRECURRING	Due Upon Signing
Service Charges	\$2,935.10	\$583.10	\$2,935.10	\$6,453.30
Other				\$0.00
TOTAL CHARGES	\$2,935.10	\$583.10	\$2,935.10	\$6,453.30

Pursuant to the Master Service Agreement by and between Edu-Net LLC and Customer, Edu-Net agrees to provide the service described above. Service is contingent upon availability. Requested service dates and charges for service are not binding on Edu-Net LLC and subject to change until Firm Order Commitment ("FOC") is issued. By signing below, the parties acknowledge and agree that this Edu-Net LLC Order Form and the Service Level Agreement shall be governed by the terms and conditions set forth in the attached Master Service Agreement. This Edu-Net LLC Service Order Form, the Master Service Agreement, and the Service Level Agreement, collectively reflect the terms of the parties' agreement on this 18th day of March, 2014 ("Effective Date").

BY: [Signature]
 Authorized Edgewood ISD Representative
Andy Baker, Superintendent of Schools
 Print Name and Title
3-18-14
 Date

BY: [Signature]
 Authorized Edu-Net LLC Representative
Stephen Howard, Managing Member
 Print Name and Title
3-25-2014
 Date

Confidential and Proprietary - Not to be disclosed without prior written approval of Edu-Net LLC.

Release Date 03.09.09

SCHOOL: EDGEWOOD ISD - TX
 BEN#: 140496 471#: 1000541
 FRN#: Multiple
 Attach #: 2 Pg 4 of 14

Edu-Net, LLC

6060 N. Central Expy, Suite 500
Dallas, TX 75206

Invoice

Date	Invoice #
7/18/2014	17322

Bill To
Edgewood ISD 804 E. Pine Edgewood, TX 75117

SCHOOL: EDGEWOOD ISD - TX
 BEN#: 140496 471#: 1000541
 FRN#: MULTIPLE
 Attach #: D Pg 1 of 14

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
98	Hot Spots	29.95	2,935.10
98	ARC	5.95	583.10
98	NRC	29.95	2,935.10
Please pay your estimated e-rate % of 25%*			
199 53 6299 44 999 499		1613.33	
NRC + ARC Once a year Okay to pay			
			2,935.10 583.10 2,935.10 Installed 2014 FRN# 2685166
			 ENTERED 021373

Phone #	Fax #	E-mail
(972) 293-7043	(972) 692-8740	accounting@aehtx.com

Total \$6,453.30

1613.33

[Print](#)[Close](#)**Re: Please define - these terms - I need this info today please**

From: **Leroy Nabors** (leroy@edunetsolutions.com)

Sent: Thu 9/03/15 2:31 PM

To: M McKay (collect-ed@hotmail.com)

Cc: TX_AVERY ISD Jeannie Beaman (jeannie.beaman@averyisd.net); Stephen Howard (stephen.howard@aebtx.com); Robin (Robin@edunetsolutions.com)

As we understand, the definition and qualification of the services we provide through our "Hotspots" would best fall into the sub-category of "Category Two" titled Eligible Managed Internal Broadband Services from the published 2015 Eligible Services List. We, the Service Provider, own, maintain, configure and manage the wireless access point equipment. The wireless access point equipment provides internet access to unwired devices on the grounds of the schools. They are controlled by us and operated on our equipment.

With regards to the charges on the Service Order Form, below is the description of each charge:

• **Monthly Recurring:** This is the monthly cost for the service we provide (the cost can be paid upfront or over the course of a year in monthly installments)

• **Annually Recurring:** This is an annual fee for licensing of devices required to deliver the service

• **Non-Recurring:** These are the costs allocated to the installation of the devices and required materials (synonymous with "Install Charges" as other Service Providers commonly use).

↳ FRN # 2685166 (2014)

Sent from my iPhone

Leroy Nabors Jr.

"God Never Asks About Our Ability or Our Inability, but About Our Availability."

"SCRIPTURE ENGAGEMENT IS WHAT LEADERS NEED IN ORDER TO REALLY "LIVE" AND LEAD AS GOD INTENDED"

"To Step Toward Your Destiny, You Have To Step Away From Your Security"

P O Box 551

