

STETSON SCHOOL  
P.O. Box 309  
Barre, MA 01005  
Phone 978-355-4541 • Fax 978-355-4901  
E-mail zbardossy@stetsonschoool.org

May 9, 2016

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

**Re CC Docket No. 02-6  
In the matter of Request for Review of a Decision of the Universal  
Service Administrator**

**Supplemental Filing to 4/29/2016 PETITION FOR RECONSIDERATION**  
of March USF Appeals Disposition Notice (DA 16-334 released 3/30/2016)  
denying an 8/24/2014 appeal  
of a 6/25/2014 Funding Commitment Decision Letter

Applicant STETSON SCHOOL (BEN 19)  
Funding Application #987111  
FRNs 2692813, 2692676, 2692868, and 2692833

Dear Ms. Dortch,

Applicant Stetson School ("Stetson") submits the attached information  
supplementing our Petition for Reconsideration submitted April 29, 2016.

We have attached three documents:

- FY 2014 E-rate Application Information Request: Six pages including cover page, marked Exhibit A.
- NSLP Claim Form Feb 2013: Four pages including cover page, marked Exhibit B.
- EPC<sup>1</sup> Customer Service Case #84334: Two pages including cover page, marked Exhibit C.

We discuss below the relevance of each attached document.

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<sup>1</sup> *E-Rate Productivity Center*, USAC's online application process management system

Ms. Marlene H. Dortch  
May 9, 2016  
Page 2

**FY 2014 E-rate Application Information Request (Exhibit A)**

This document is the Application Information Request for the funding application for which Stetson appeals the discount rate. The section identified as "II. Requested Discount" requests information in support of Stetson's claimed discount rate.

Since Stetson does participate in the National School Lunch Program, "Option 1: NSLP Participation" describes the information Stetson is to produce in support of its claimed discount Rate.

**NSLP Claim Form Feb 2013 (Exhibit B)**

This document is a copy of the NSLP claim form requested in the Application Information Request. The form is marked with explanatory notes, including notes indicating each required element requested.

**E-Rate Productivity Center – Customer Service Case #84334 (Exhibit C)**

On May 6 Stetson's representative contacted the USAC SLD<sup>2</sup> Client Services Bureau ("CSB") staff via telephone, and asked the CSB representative<sup>3</sup> to make a determination as to whether the annotated NSLP Claim Form was fully responsive to the Application Information Request.

The CSB representative stated on the phone that the NSLP Claim Form was indeed fully responsive, and (at the request of Stetson's representative) entered the following note (which can be read in the attached case record):

*David,*

*I've reviewed the documents you sent regarding your PIA review, and the information contained in them appears to meet the requested information in the PIA Information Request.*

Respectfully submitted,  
STETSON SCHOOL



Zoltan Bardossy  
IT Director

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<sup>2</sup> Universal Service Administrative Company, Schools and Libraries Division

<sup>3</sup> The CSB representative identified himself as "Tim C."

# EXHIBIT A

to “Supplemental Filing to 4/29/2016 PETITION FOR  
RECONSIDERATION” dated May 9, 2016

## FY 2014 E rate Application Information Request

Five pages follow

FY 2014 E-rate Application Information Request

05/14/2014

Contact Name: Zoltan Bardossy  
Applicant Name: STETSON SCHOOL  
FCC Form 471 Application Number(s): 987111  
Response Due Date: 05/22/2014

Initial PIA  
Request Document

Dear Applicant:

You were recently sent a written request for additional information needed by the Program Integrity Assurance (PIA) team to review your Funding Year 2014 FCC Form 471 Applications for E-rate discounts. This is a reminder that the response due date is approaching. To date, none of the requested information has been received. The information needed to complete the review is listed below.

**I. Eligibility of Products or Services**

*Issue*

We have not yet received the Item 21 Attachments for your Funding Year 2014 FCC Form 471 application # 987111. In order to process the FCC Form 471, we must receive the Item 21 Attachments.

If you are unsure what constitutes an Item 21 Attachment, please refer to the FCC Form 471 Instructions available at: <http://www.usac.org/sl/applicants/step04/item-21.aspx>.

*Questions*

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

1. If you have not yet submitted the Item 21 Attachments, please do so using our online system available at [www.sl.usac.org/menu.asp](http://www.sl.usac.org/menu.asp) and then notify us when you have completed and submitted the Online 21 Attachment. If you prefer, you may forward the Item 21 Attachments to our attention at the e-mail address or fax number listed at the end of this letter.

If you have already submitted the Item 21 Attachments, please e-mail or fax an EXACT COPY of the Item 21 Attachments that were previously submitted. If you do not wish to resubmit the Item 21 Attachment, you are not required to do so. We will process your application once the Item 21 Attachments are available in our online system or have been imaged into our system.

**II. Requested Discount**

*Issue*

Based on the review of your Funding Year 2014 FCC Form 471 application 987111, we were not able to validate your requested discount percentage of the following entities.

For additional information on calculating your discount level, see:  
<http://www.usac.org/sl/applicants/step04/discounts.aspx>.

Listed below are the entities and the requested discount percentage:

Entity	Requested Discount
STETSON SCHOOL, 19	90%

*Questions*

To assist us in the review of your application, please provide the appropriate documentation as described in the options listed below.

**Option 1: NSLP Participation**

If the school participates in the National School Lunch Program (NSLP), please provide a signed copy (preferably by the Principal, Vice-Principal, Superintendent or Director of Food Services) of a Reimbursement Claim Form that the school sends to the state each month as part of their participation in the program. The signed Reimbursement Claim Form should include the signature of the school official, the signature date, and the Claim Form's date. Make sure that the following three items are identified on the claim form:

- a. The entity name
- b. The total number of students enrolled at the entity
- c. The total number of students eligible for participation in the Free or Reduced Lunch Program for the entity

If the school district fills out an aggregate claim form for the school, please provide a signed letter on school letterhead from a school official (preferably the Superintendent or other chief school official) that lists the enrollment and Free/Reduced information for each school in the district. The enrollment and Free/Reduced information provided in your letter should match the information that appears on the claim form.

**Option 2: Survey**

If the discount percentage was determined by information obtained from an income survey or application (NSLP Lunch Application forms cannot be used as survey or application instruments), please provide the following information on school letterhead signed by a chief school official (such as the Principal, Vice Principal, Superintendent or Director of Food Services):

- a. Total number of students enrolled at the school
- b. Total number of surveys/applications sent out (If a single survey is sent to households with more than one student, please indicate the total number of students represented by the surveys)
- c. Total number of surveys/applications returned (If a single survey is sent to households with more than one student, please indicate the total number of students represented by the surveys)
- d. Total number of students qualified for participation in NSLP based upon the information provided in the returned surveys/applications
- e. Are the surveys/applications and results kept on file?  Yes  No

**Response due: 05/22/2014**

- a. If **Yes**, for how long are they kept on file?
- f. A statement that confirms that only students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a of Block 4 of the FCC Form 471

Provide a sample copy of a FILLED OUT SURVEY OR APPLICATION with the child's personal information crossed out for confidentiality. **Be advised that in order for a survey to be acceptable it must contain the family's name, student's name, the size of the family and the income level of the family.**

A school cannot include in their numbers other alternative methods, such as sibling match, direct certification etc., and then extrapolate as well. Schools may combine multiple alternative methods, such as survey results, sibling match, direct certification etc., but must ensure that the same students are not counted multiple times, and cannot extrapolate the results from multiple surveys.

**Option 3: Financial Aid forms**

If the discount percentage was determined by information obtained from a financial aid form, please provide the following information in writing on school letterhead signed by a school official (such as the Principal, Vice Principal, Superintendent, or chief school official):

- a. Total number of students enrolled
- b. A statement that confirms "all students have access to financial aid forms
- c. A statement that confirms that financial aid applicants are required to submit Federal Tax forms to document family income
- d. A statement that confirms the number of students who meet the NSLP Income Guidelines
- e. A statement that confirms the number and percentage of eligible students that supports the requested E-rate discount level
- f. A statement that confirms the school keeps all completed financial aid application on file.
- g. A statement that confirms that only students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 9a of Block 4 of the FCC Form 471

The school must submit one completed financial aid application, with personal information blackened out. The financial aid application must have been completed within two years of the start of the fund year.

**Option 4: State Department of Education Verification**

Provide a letter from your State Department of Education (on state letterhead and signed by a chief official at the State Department of Education) verifying that the total student enrollment and the free and reduced figures you provided are accurate.

**Option 5: Letter from State Food/Nutrition Office**

Provide a letter from your State Food/ or Nutrition Service Authority officials (on state letterhead and signed by a chief official of the State or Nutrition Service Authority) verifying the total student enrollment and the free and reduced figures you provided are accurate.

**Option 6: Other Methods**

If the discount percentage was determined using a different method than any of the methods identified above, please clearly describe and explain the survey method that was used and provide all relevant data, forms, or other tools that were used during the survey process. For example, a school has a changing student population in a given school year as the school provides educational services to students drawn from other schools.

Please submit the necessary information within the 15 calendar day deadline of this request. Failure to respond may result in a reduction or denial of your funding request(s).

**III. Eligibility of the Entities**

*Issue*

Based on the review of your Funding Year 2014 FCC Form 471 application **987111**, we have determined that the entity(ies) listed below that are included in your request for services appear to be or include residential facility(ies).

Residential facilities are only eligible for funding under the following conditions:

- Schools where 35% or more of the students are eligible for NSLP, which translates to a 60% (urban) or 70% (rural) discount;
- Schools on Tribal Lands, Juvenile Justice schools (if Juvenile Justice is eligible in the state);
- Schools serving students with medical needs, e.g. schools for the deaf/blind or;
- Schools serving students with cognitive and behavioral disabilities.

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

Listed below are the ineligible residential facility(ies):

Entity
STETSON SCHOOL, 19

*Questions*

To assist us in the review of your application, if an entity does not meet the conditions described above we need the following information about the entities outlined above:

1. Describe in detail what portion of the service is provided to dormitories, residential facilities, or home based facilities.
2. For each FRN, please provide a dollar cost allocation or percentage of total cost for services that are provided to dormitories, residence rooms, or home based facilities. All cost allocations must be based on tangible criteria and reach a realistic result.
3. Please confirm that the balance of the services, following the above cost allocation, is being provided to facilities of instruction or classrooms.
4. Please provide substantiating documentation supporting the information provided for questions 1, 2 and 3.
5. If the entity is a Head Start school, please respond to the questions below.

**Response due: 05/22/2014**

- a. Please provide the Head Start enrollment (student count) and students eligible for free and reduced lunch that is included in Block 4 of this FCC Form 471 for each facility mentioned above.
  - b. Please provide the number of Head Start students that are under the age of 3.
6. Your response should be in writing 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.

Failure to provide the above information will result in a cost allocation of services provided to residential facilities for each FRN and possible denial of your funding requests.

Please be advised that the removal of an entity from Block 4 of your FCC Form 471 application may increase or decrease your discount percentage, which could impact your funding.

*Response Reminders*

Please email or fax the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review of your application(s). **If we do not receive the requested information by 05/22/2014, your application(s) will be reviewed using the information currently on file. Failure to send all of the information requested may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

Should you wish to cancel your FCC Form 471 application, or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s); along with the FCC Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

A copy of this correspondence is being forwarded to your State E-rate Coordinator for informational purposes only.

Thank you for your cooperation and continued support of the Universal Service Program.

Sincerely,

Eric Gazdalski  
PIA Reviewer  
Program Integrity Assurance  
USAC, Schools and Libraries Division  
Phone: 973-581-6738  
Fax: 973-599-6522  
E-mail: [eric.gazdalski@sl.universalservice.org](mailto:eric.gazdalski@sl.universalservice.org)

# EXHIBIT B

to “Supplemental Filing to 4/29/2016 PETITION FOR  
RECONSIDERATION” dated May 9, 2016

## NSLP Claim Form Feb 2013

Three pages follow

# NSLP Claim Form Feb 2013

## Page 1 of 3

username:

school name


 Security Portal Log Out
14-021-I73R **Stetson School, Inc.**

\*Claim FEB-2013 Claim 1, Rev 0 (PAID)

**Reimbursement**

Claim Month/Year : Feb 2013			
Meal Type	Meals Served	Rate	Amount
Total Lunches (State)	1290	0.0575	74.18
Total Lunches (Federal - Base)	1290	0.2700	348.30
Total Lunches (Federal - Severe Need)	1290	0.0200	25.80
Total Lunches (Federal - PBF)	0	0.0600	0.00
Free Lunches	1290	2.5900	3341.10
Reduced Price Lunches	0	2.1900	0.00
Paid Lunches/Free to Student Workers	0		
<b>Total Claim for Served Lunches</b>			<b>3789.38</b>
Free Breakfasts	0	1.5500	0.00
Reduced Breakfasts	0	1.2500	0.00
Free Breakfasts (Severe Need)	1290	1.8500	2386.50
Reduced Price Breakfast (Severe Need)	0	1.5500	0.00
Paid Breakfasts	0	0.2700	0.00
<b>Total Claim for Served Breakfasts</b>	<b>1290</b>		<b>2386.50</b>
Free After School Snack At Risk	690	0.7800	538.20
Free After School Snack Non Risk	0	0.7800	0.00
Reduced After School Snack	0	0.3900	0.00
Paid After School Snack	0	0.0700	0.00
<b>Total Claim For After School Snack</b>	<b>690</b>		<b>538.20</b>
<b>Total Combined Claims for Lunch and Breakfast Program</b>			<b>6714.08</b>
Additional State Reimbursements:			
Severe Need Free Breakfast			0.00
Severe Need Reduced Breakfast			0.00
Special Milk:			
Free Milk	0	0.0000	0.00
Paid Milk	0	0.1925	0.00
<b>Total Milk</b>			<b>0.00</b>
Totals By Appropriation Account:			
Section 4 - Federal			912.30
Section 11 - Federal			3341.10
State Share			74.18
Breakfast - Federal			2386.50
Breakfast - State			
Milk - Federal			0.00
<b>Total</b>			<b>6714.08</b>

Note: In Massachusetts NSLP claims are filed electronically with the Massachusetts Department of Elementary & Secondary Education using the online claims system (similar to how E-Rate funding applications are now all filed electronically).

These three pages are the claims form as reported by the online system. The school used the figures from this claim form on Funding App #987111.

**NSLP Claim Form Feb 2013**  
**Page 2 of 3**

username:

**14-021-I73R Stetson School, Inc.**

\*Claim

**District Level Claim**

<b>1. General Information</b>									
District Name	Stetson School			Claim Month/Year	FEB-2013 Claim 1, Rev 0				
Mailing Address	445 South Street PO Box 309 Barre, MA 01005			Status	PAID				
Phone	978-355-4541 Ext. 175								
Remarks									
<b>Number of Approved Applications on File:</b>									
	<b>Program</b>	<b>Free</b>	<b>Reduced</b>	<b>Total</b>					
	Lunch	47	0	47					
	Breakfast	94	0	94					
	Special Milk	0		0					
	After School At Risk	47		47					
	After School Non Risk	0	0	0					
<b>Summary Information By Program:</b>									
<b>School Lunch and Breakfast</b>									
		<b># Sites</b>	<b>Enrollment</b>	<b>Operating Days</b>	<b>Attend.</b>	<b>Participation</b>	<b>Redu Student Charge</b>	<b>Adult Charge</b>	
	Lunch	1	47	28	46	46	0.00	0.00	
	Breakfast	9	94	20	93	65	0.00	0.00	
	Special Milk	0	0	0	0	0			
	After School At Risk	1	47	15	46	46			
	After School Non Risk	0	0	0	0	0	0.00		
<b>Special Milk</b>									
		<b>Cost of Milk</b>				<b>Total Served</b>			
	Purchased	0				Free Milk	0		
	Total Cost	0.00				Paid Milk	0		
	Cost Per								
<b>Meal Counts:</b>									
		<b>Free</b>	<b>Reduced</b>	<b>Paid</b>	<b>Severe Free</b>	<b>Severe Reduced</b>	<b>At Risk</b>		
	Breakfast	0	0	0	1290	0			
	Lunch	1290	0	0					
	Snack	0	0	0				690	
<b>Total District Breakfast Operating Costs by Category (For sponsors with at least one severe need site):</b>									
		<b>Food Supplies</b>	0.00		<b>Non-Food Supplies</b>	0.00			
		<b>Labor to Prepare/Serve/Clean:</b>	0.00		<b>Supervisor(s):</b>	0.00			
		<b>Total:</b>	0.00						
		<b>Number of Breakfasts Served by All Schools:</b>	1290		<b>Average Cost:</b>	0.0000			
		Not Claiming							

# NSLP Claim Form Feb 2013

## Page 3 of 3



14-021-I73R Stetson School, Inc.  
I73R-001 STETSON SCHOOL, INC

### School Claim

\* Claim FEB-2013, Rev 0 (DONE)

<b>1. General Information</b>						
Mailing Address	455 SOUTH STREET	Claim Month/Year	FEB-2013, Rev 0			
		Telephone	355-4541			
	BARRE, MA 01005	Provision				
Breakfast Mandated	No	Severe Need Eligible	Yes	At Risk	Yes	
Enrollment	47	Avg. Daily Attend	46	# Free Apps	47	# Reduced Apps
After School Enrollment		After School Avg. Daily Attend		After School # Free Apps		After School # Reduced Apps
Comments						
<b>Provision Base Year</b>		<b>Days Open</b>	<b>Free</b>	<b>Meals Served</b>		<b>Total</b>
	Lunch	28	1290	0	0	1290
	Breakfast	20	922	0	0	922
	After School	15	690	0	0	690
	Special Milk	0	0		0	0
<a href="#">View Site Application</a> Done						

total students -----

----- NSLP students

[Top of Page](#)

*Carrie Lehmann*

*Education Director*

*5/6/16*

Carrie Lehmann

Education Director, Stetson School

Signature date

# EXHIBIT C

to “Supplemental Filing to 4/29/2016 PETITION FOR  
RECONSIDERATION” dated May 9, 2016

EPC Customer Service Case #84334

One page follows

#84334

[Follow](#)[Reopen Case](#)

## Case Details



<b>Topic</b>	Appeals - How to Submit	<b>Form Type</b>	FCC Form 471
<b>Status</b>	Closed	<b>Form Number</b>	987111
<b>Priority</b>	Medium	<b>Created By</b>	USAC
<b>Inquiry Type</b>	Phone	<b>Created On</b>	5/6/2016 2:57 PM PDT
		<b>Organization</b>	<a href="#">STETSON SCHOOL</a>

## Case Description

**Description** Is my documentation accurate and appropriate for a review?

Advised I would look over the documents and give him my feedback.

## Case Artifacts



### Documents

Name	Uploaded By	Upload Date
<a href="#">Attn Tim C -- Case #84334</a>	USAC	5/6/16 3:07 PM

### Attachments

Attachment	Attachment Type
No items available	

## Case Thread



User	Note	Date
USAC	David, I've reviewed the documents you sent regarding your PIA review, and the information contained in them appears to meet the requested information in the PIA Information Request.	5/6/2016 3:07 PM PDT

## Case Contact

**Case Contact** David Behar