

From: [SLDCaseAttachments](#)
To: [SLD E-Rate](#)
Subject: FW: SLD Inquiry #: 22-887533 Received
Date: Sunday, March 20, 2016 1:38:41 PM
Attachments: [JCEOC Appeal.PDF](#)

From: Katherine M. Weiss
Sent: Sunday, March 20, 2016 1:37:53 PM (UTC-05:00) Eastern Time (US & Canada)
To: SLDCaseAttachments
Subject: Re: SLD Inquiry #: 22-887533 Received

Enclosed

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

From: "sldcaseattachments@sl.universalservice.org"
To: kweiss@erategroup.com
Sent: Sunday, March 20, 2016 1:34 PM
Subject: SLD Inquiry #: 22-887533 Received

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-887533.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

You indicated in your submission that you wish to send us an attachment. To submit an attachment, please reply to this message and attach your attachment to the reply. Any additional information you wish to provide should be included in the attachment, not added to the text of this email.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl. Thank you.

Here is the information you submitted:

*[FirstName]=Katherine [LastName]=Weiss [JobTitle]=Consultant
[EmailAddress]=kweiss@erategroup.com [WorkPhone]=7329468300 [FaxPhone]=
[PreviousCaseNumber]=0 [FormType]=Appeal [Owner]=APPEALS
[DateSubmitted]=3/20/2016 1:31:51 PM [AttachmentFlag]=Y[FRN]=2761219
[FormType]=471 [ApplicationNumber]=1017245 [Question2]=March 20,2016
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- 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: Head Start 3 yr old validation not provided for current year. Reason for Appeal and Documentation: A Reconsideration is sought based upon the following 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 inconsist 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 IA. In addition, the appeals reviewer never indicated that the information submitted is not complete/sufficiemt as is standing procedures 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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use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is **STRICTLY PROHIBITED**. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.

March 20,2016

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- 887533

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:

Head Start 3 yr old validation not provided for current year.

Reason for Appeal and Documentation:

A Reconsideration is sought based upon the following

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, Jeco 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(e) 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 Red 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(e) 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 Red 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
10F9

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

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 <riaclair@JCEO.org>
To: Joseph Weiss <jweiss@erategroup.com>
Sent: Wednesday, September 3, 2014 11:14 AM
Subject: RE: E-Rate Response - JCEO

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

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):

Entity
BEEKMAN CENTER
BRUSHTON CENTER
CHAMPLAIN CENTER
CHATEAUGAY CNTR
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

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
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 H. 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 502
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
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

02CH1009	HS	Albany County Opportunity, Incorporated	Watervliet	2557 10th Ave	Watervliet Elementary School	Watervliet	NY	12189	1764	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Giffen Elementary School	274 S Pearl St		Albany	NY	12202	1829	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Ann Klöse First (AK 1st)	295 Colonie St		Albany	NY	12210	1535	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Early Learning Center:ELC	25 Monroe St		Albany	NY	12210	2729	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Ogden Mills	1 Ogden Plaza		Cohoes	NY	12047		Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Olivia Rorie (ORC)	7 Morton Ave		Albany	NY	12202	1655	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Lincoln Square L.S.Q	31 Lincoln Sq		Albany	NY	12202	1652	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Philip Schuyler/SAA	676 Clinton Ave		Albany	NY	12206	2216	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Arbor Hill Elementary School	1 Arbor Dr		Albany	NY	12207	1310	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Colonie Head Start	1653 Central Ave		Colonie	NY	12205	4021	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Ontario St	170 Ontario St		Albany	NY	12206	2321	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Berne-Knox-Westerlo (BKW)	1738 Helderberg Trl	Berne-Knox-Westerlo Elementary School	Berne	NY	12023	2926	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Ravena	15 Mountain Rd		Ravena	NY	12143	1234	Albany
02CH1009	HS	Albany County Opportunity, Incorporated	Green Island	171 Hudson Ave	Healy Elementary School	Green Island	NY	12183	1212	Albany



Patty Persell

New York State Head Start Collaboration Director

NYS Council on Children and Families

52 Washington Street, Suite 89 West
 Rensselaer, NY 12144

(518) 474-9152

Patricia.persell@ccf.ny.gov

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

Entity Number:	16081093
Entity Name:	GREEN ISLAND
NCEES District Number:	
Primary Street:	171 HUDSON AVE
Primary City:	GREEN ISLAND
Primary State:	NY
Primary Zip:	12181

Entity Number:	16083094
Entity Name:	ONTARIO EARLY CHILDHOOD EDUCATION CENTER
NCEES District Number:	
Primary Street:	170 ONTARIO STREET
Primary City:	ALBANY
Primary State:	NY
Primary Zip:	12206

Joseph J Weiss
E-Rate Solutions Group
Phone - 712 946 8300 Fax - 712 946 8309
www.e-rate.com

Attachments

- image003.jpg (5.38KB)

Exhibit III
10FS

Transmission Log

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 28*1495

Case # 22-862645

BEN and contact information

Appellant Name

Katharine 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):

Entity
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

10F3

Subject: Re: Pro Action of Steuben and Yates Inc. APP 1017517
From: Katherine M. Weiss (kweiss@eralegroup.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

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

***Confidentiality Notice:** The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is **STRICTLY PROHIBITED**. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.*

Exhibit V

1055

Subject: Re: Regional Economic Community 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 - MIDDLE TOWN SCHOOL.	
16045405 WESTERN ORANGE COUNTY HEADSTART- SCOTCH TOWN 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 | 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]
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 | 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]
Sent: Monday, September 15, 2014 4:24 PM
To: Lawrence Morici
Cc: gambino@recap.org; 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

From: Lawrence Morici <lmorici@recap.org>
To: Katherine M. Weiss <kweiss@erategroup.com>
Cc: "lgambino@recap.org" <lgambino@recap.org>; "ssabine@recap.org" <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 | 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> 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):

Entity
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

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

Confidentiality Notice: The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is **STRICTLY PROHIBITED**. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.

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

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