

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the Matter of:)
)
Request for Waiver)
) CC Docket No. 02-6
by)
)
Diocese of Cleveland Schools)
Cleveland, OH)

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

This filing contains supplemental information supporting an FCC Request for Waiver filed on behalf of the Diocese of Cleveland (“DOC”) on 6/4/2015 (Confirmation Number: 201564753417) by their E-rate Consulting Company Educational Funding Group (“EFG”). This information is being provided at the request of the FCC. Please see the list of included exhibits below, followed by a brief explanation of the exhibits and how they support the DOC’s assertion that these entities and FRNs were left off the FCC Form 471 990347 due to a clerical and/or ministerial error.

1. **Exhibit A** – Consultant Planning Spreadsheet with a last modified date of 3/24/2014. This spreadsheet was used by the EFG as the data source for the preparation of the Form 471 and contained a listing of all planned FRNs. In the tab “YR2014 Planning” in columns AX and AY, there are two FRNs that were prepared for St. Edward High School (“SEHS”) and columns BL – BO contain four planned FRNs for Trinity High School (“THS”). Although not all of the information reflected in these columns is accurate to the schools’ final choices, this sheet clearly proves the intention to include these FRNs on the Form 471. Due to the need to preserve the last modified date of this exhibit, it will not be physically or digitally labelled with “Exhibit A”.

2. **Exhibit B** – SEHS’s Cox Contract signed on the Allowable Contract Date. This contract shows all the services for which St. Edward’s HS was applying for E-rate funding – namely Internet Access, PRI, and Local & Long Distance Service. These were to be split over two FRNs (one for Telecommunication Services and another for Internet Access Services). As this contract was signed both on the ACD and before the application was filed on 3/26/14, it further proves that these FRNs were intended to be on Form 471 Number 990347.

3. **Exhibit C** – THS’s One Community Contracts and Addendums. This contract was competitively bid on FCC Form 470 40300000982775, which was filed in 2012. The contract had a three-year term (please see Addendum B on the final page of the One Community Contract, which governs the term). It was filed under FRN 2340163 on FCC Form 471 859784 in FY2012 and under FRN 2477371 on FCC Form 471 899642 in FY2013. As FY2014 would have been the final year of the contract, it is clear that this FRN was mistakenly omitted from the Form 471.

4. **Exhibit D** – THS’s Principal’s E-mail with Consortium LOA and Invoices for E-rate Eligible Services Attached. This e-mail clearly supports THS’s intent to join the Diocese of Cleveland Consortium for the FY2014 E-rate filing with the completion of the Consortium LOA. Additionally, THS was currently receiving MTM telecom services and invoices were sent to EFG to ascertain the amount of funding that was to be applied for. This is further proof of their intention to apply for these services in the 2014-2015 E-rate year.

5. **Exhibit E** – Signed Certifications from SEHS’s and THS’s Principals regarding the clerical error. These certifications were included in a USAC Appeal. They certify the intention of both schools to be included in the FCC Form 471 filing and assert that the reason that they were not included was due to a clerical error on the part of EFG.

Given the exhibits above, it is clear that due to clerical errors, EFG inadvertently omitted the two FRNs for SEHS and the four FRNs for THS from FCC Form 471 990347. These omissions were truly clerical errors that occurred during the transfer of data from the source documentation to FCC Form 471 990347.

EFG reserves the right to supplement these exhibits with additional information.

Application Information:

DIOCESE OF CLEVELAND SCHOOLS

Billed Entity Number: 129483

FCC Form 471 Application Number: 990347

Date of Administrator’s Decision

On Appeal Letter: April 9, 2015

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Respectfully submitted,

/s/Courtney Cikach

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