

ORIGINAL

**WESTERN HEIGHTS SCHOOL DISTRICT NO. I-41**

8401 S.W. 44th  
Phone (405) 745-6300

Oklahoma City, OK 73179  
FAX (405) 745-6322

Office of the Superintendent

DOCKET FILE COPY ORIGINAL

June 21, 1999

RECEIVED

Magalie Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

JUN 24 1999

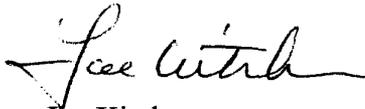
FCC MAIL ROOM

**Re: In the Matter of Request for Review by Western Heights Public School District of Decision of Universal Service Administrator Under FCC Docket Nos. 97-21 and 97-45**

Dear Ms. Salas:

Enclosed please find the original and four copies of the Request for Review of Western Heights Public School District in the above-referenced matter.

Sincerely,



Joe Kitchens  
Superintendent

Attachments

No. of Copies rec'd  
List ABCDE

044

**Before the  
Federal Communications Commission  
Washington, DC**

**RECEIVED**

JUN 24 1999

**FCC MAIL ROOM**

In the Matter of: )  
 )  
Request for Review by )  
 )  
WESTERN HEIGHTS PUBLIC SCHOOL DISTRICT )  
 )  
Of decision of Universal Service Administrator )  
Under FCC Docket Nos. 97-21 and 96-45 )  
 )  
To: Common Carrier Bureau )

Billed Entity No. 139844  
Application No. 54054  
Funding Request No. 156635

**REQUEST FOR REVIEW**

Western Heights Public School District ("Western Heights" or "District"), pursuant to Sections 54.719-54.721 of the Rules hereby seeks review of the Decision of the Universal Service Administrator dated May 26, 1999, denying funding in full for the above-referenced Funding Request Number ("FRN").

**I. Summary of Administrative Actions  
Request for Transfer to Administrator**

On February 9, 1999, the Schools and Libraries division of the Administrator ("SLD") issued a Funding Commitment Decision Letter to Western Heights, fully funding the above-referenced FRN. The FRN provided E-rate discounts to the District for the purchase and installation of advanced network electronics that would enable the District to bring telephone communications to every classroom. Because the funding amount was different from what appeared in the District's records, the District filed a Letter of Inquiry with the SLD. Thereafter, instead of responding to the Letter of Inquiry, the SLD asked the District to provide additional information in connection with the underlying contract. The District fully and timely complied with all of the SLD's supplemental requests.

On May 26, 1999, the SLD issued a Decision on Appeal. In its Decision, which we submit was the administrative and functional equivalent of a Funding Commitment Decision Letter to the extent that it contained an initial funding determination, the SLD notified the District - for the first time - that the FRN would receive no funding, rather than only partial funding. According to the SLD, the "majority of the services" requested under the FRN were ineligible.

To preserve its right under Section 54.720 of the Rules to request a *de novo* review of the Administrator's so-called Decision on Appeal, Western Heights believes that it had no choice but to timely file this appeal with the Commission. However, because the SLD, in effect, abrogated the District's rights under Section 54.719 to seek review of a Universal Service funding decision at the Administrator level, we request that the Commission transfer this appeal, along with all supporting exhibits, back to the SLD, so that it may make the initial determination to which the District is entitled.

Transferring this matter back to the Administrator would afford the SLD its first opportunity to engage in a complete review of the District's evidence and arguments in support of the FRN since its surprise decision not to fund it. We are confident that upon careful review of all of the facts presented herein, the SLD would restore full funding to the FRN.

## **II. Statement of Material Facts**

Western Heights is a small school district in West Oklahoma City. The District has approximately 3,300 students in six schools. Reflecting the extreme poverty that exists among families in the District, Western Heights has a shared E-rate discount of 88%. (*See Exhibit A, FCC Form 471*)

Belying its small size, Western Heights has one of the most advanced K-12 networks in the country. The Smithsonian Institution and some of the world's leading technology companies, including Intel, Microsoft, Dell, and Gateway, have recognized Western Heights for the progressive manner and speed with which it has integrated technology, including video on demand and video conferencing, into the classroom curriculum and for the architecture of JetNet, the school district's state-of-the-art, gigabit data network. (*See Exhibit B*)

Western Heights is committed to bringing telecommunications services into every one of its classrooms, as it believes that such services provide a valuable link between students, teachers, parents, and administrators.

To accomplish this objective, Western Heights had two options. The first option was to install a major PBX at each school site. This would require the purchase of PBXs, as well as handsets, and telephone wiring. The second option was to install an Internet protocol or IP-based system. This would require only the purchase of electronics to interface between the District's existing data and telecommunications networks.

Western Heights discovered that an advanced IP-based solution would save it approximately \$160,000 over a conventional PBX system. (*See Exhibit C, "Standard PBX vs IP-Based Telephony Solution"*). Moreover, the IP-based solution offered the District additional functions not available through standard PBX, such as phone calls from standard phones to computer or IP-based phones and vice versa. (*See Exhibit D, "Sample Communications Schemes"*). Because of the price/function advantages of the IP-based solution, the District eventually opted for it over PBX.

After complying with the Commission's competitive bidding requirements, Western Heights selected and thereafter contracted with Lucent Technologies, Inc. ("Lucent") to create a fully integrated, analog/digital telecommunications network that would bring telephony to the classroom. (See Exhibit E, Proposal, Agreement and Board Approval and District Purchase Order). Lucent's solution was to install its own MultiMedia Communications Exchange Server ("MMCX"), which it claimed would successfully link all of the District's voice, video, and data applications. (See Exhibit E, Lucent's Proposal, Multi-Media Communications Exchange).

On April 13, 1998, Western Heights filed FCC Form 471 with the Schools and Libraries Corporation ("SLC"), requesting E-rate support for \$223,884 worth of eligible services under its contract with Lucent. (See Exhibit A, Form 471; Exhibit E, Lucent's proposal; and Exhibit F, Summary of Original Lucent Multimedia Exchange Server Contract, showing, among other things, a \$78,040 reduction for ineligible services).

In July 1998, Lucent installed the MMCX system but, despite its best efforts, could not get it to function properly in the District's unique network environment. Western Heights reacted quickly to this unfortunate and unexpected development, contacting Integrative Solutions, the district's system integrator.

On August 20, 1998, Integrative Solutions replied by letter to Western Heights explaining why it believed its solution to IP-based classroom telephony would work, even though Lucent's would not. (See Exhibit G). Instead of a single unit, as Lucent had offered, Integrative Solutions proposed a group of electronics that together would provide the functionality that the Lucent MMCX was supposed to provide. Their solution included a Net Server and Net Gate from Video Server, Inc., an Access Server and Router from Cisco. Integrative Solutions quoted the cost of these four main pieces of network electronics at \$122,832.50. Shortly thereafter, in full compliance with state and local procurement law, Western Heights reassigned the Lucent contract to Integrative Solutions. (See Exhibit H, Purchase Orders)

On August 28, 1998, in accordance with the correction policy announced by the SLC, Western Heights filed a form entitled Correction Request for Form 471, asking the SLC to substitute Integrative Solutions for Lucent as the service provider on its Form 471. (See Exhibit I). Unfortunately, Western Heights mistakenly advised the SLC to reduce the estimated prediscount cost from \$223,884 to \$122,732.50 at the same time; the reduced amount represented only the cost of the principal hardware detailed in Integrative Solution's August 20 letter; it did not include related installation costs. The SLD approved the District's correction request. (See Exhibit J, Funding Commitment Decision Letter and Exhibit O, Administrator's Decision on Appeal).

On February 9, 1999, the SLD issued a Funding Commitment Letter to Western Heights, awarding the school district \$95,731.35 in E-rate support for the Integrative Solutions contract. On March 1, 1998, Western Heights sent a Letter of Inquiry to the

Administrator, questioning what appeared to be a reduced level of funding for the FRN. (See Exhibit K).

On April 23, 1999, an SLD representative contacted Western Heights to discuss in more detail several matters related to the FRN that had been the subject of the District's narrow Letter of Inquiry. The District, in turn, referred him to the consulting firm it had retained to support and oversee its E-rate application process. Following a discussion between those two parties, a letter was faxed to the SLD recounting the information provided over the phone and asking that the additional \$101,286.57 in funding originally requested be restored. (see Exhibit L).

On May 1, 1999, the SLD representative faxed a series of follow-up questions (see Exhibit M), and on May 3, 1999, a detailed response was faxed to the SLD. (See Exhibit N). Curiously, most of the SLD's questions in both sets of exchanges seemed to center on the moot Lucent contract, rather than on the Integrative Solutions contract, for which funding was actually being sought.

On May 26, 1999, the Administrator issued its Decision on Appeal (see Exhibit O). However, rather than limiting itself to the issue of partial funding, which was the only subject of Western Heights' Letter of Inquiry, the Administrator instead decided to reverse its previous decision, this time denying funding to the FRN in its entirety. (The Administrator treated the Letter of Inquiry as a Letter of Appeal on its own motion).

With no notice to Western Heights that the \$95,731.35 in funding that the Administrator had already approved was ever in jeopardy, the Administrator concluded, without elaboration, that the majority of services requested in the FRN were now ineligible for E-rate support.

In its Decision on Appeal, the Administrator (a) responded to the District's Inquiry; (b) issued a new funding commitment decision; and (c) gave its reason for refusing to fund the FRN. The Administrator decision and reasoning is set forth here in its entirety:

The service funding requested on your Form 471 was changed per your August 28, 1998 Correction Request for Form 471. In this document you requested we cancel the \$223,884 Lucent Technologies service and replace it with a \$122,732.50 Integrative Solutions, Inc. service. This was done and included as Funding Request Number 156635. During our current review of this service, we determined the majority of the services are ineligible (Video Server, Inc. Net Server Dual PRI and Net Gate, Dual PRI & IMUX) and the Funding Request Number is now denied.

### **III. Question Presented for Review.**

Whether network electronics that together connect an analog to a digital network and integrate the functions of the two are necessary to transport information to individual classrooms, and thus eligible for E-rate support.

### **IV. Discussion**

In its May 8, 1997 Universal Service Report and Order, CC Docket No. 96-45, at ¶ 459, the Commission defined "Internal Connections" eligible for E-rate support as services and equipment "necessary to transport information all the way to individual classrooms." Applying that standard, the Commission decided that E-rate support should be made available to purchase, install and maintain hardware such as routers, hubs, and switches, "because all are needed to switch and route messages within a school or library." Report and Order at ¶ 460.

The SLD clearly misapplied the Commission's definition of "Internal Connections" when it concluded that the majority of hardware included under the FRN was ineligible for support. Contrary to the SLD's cursory conclusion and as the facts presented here clearly demonstrate, each piece of equipment covered by the FRN is absolutely essential to the successful transport of information into and out of individual classrooms in the Western Heights school district.

Western Heights presented Integrative Solutions with the problem of how to bring IP-based telephony, including video conferencing, into every classroom in the school district. That company proposed and later installed a sophisticated combination of network electronics to accomplish this objective. That hardware included a Multimedia Conferencing Unit (MCU) called Net Server, an H.320, or voice, gateway to the MCU called Net Gate, a router, and an access server. (See Exhibit G). This grouping of hardware created an electronic bridge between two otherwise incompatible networks, one digital and the other analog. Take out any single piece of equipment and the bridge will collapse and information will cease to flow.

This bridged, analog/digital network, which is nothing short of amazing, is surely an example of advanced telecommunications at its best. The electronics in issue here will take IP-based telephone calls from classrooms, route and switch them over the analog/digital network, and send them on their way to any telephone or computer within the District or to any telephone on the public switched telephone network.

As discussed above, the Commission had no difficulty concluding that network electronics that route and switch information within a school are eligible for E-rate support. All of the network electronics in this FRN are clearly entitled to funding for exactly the same reason.

That the Commission has decided to fund standard PBX switching equipment further supports the conclusion that the District's selection of sophisticated analog/digital equipment must also be funded. It makes no sense to penalize the District for opting to install a more advanced, yet less expensive and more versatile, system of information and telecommunications switching. A decision not to fund this FRN completely, we submit, would render meaningless the Commissions finding that "schools and libraries should have maximum flexibility to purchase the package of services they believe will most effectively meet their communications needs." Report and Order at ¶ 425. *See, also*, Report and Order at ¶ 432 ("Given the varying needs and preferences of different schools and libraries and the relative advantages and disadvantages of different technologies, we agree with the Joint Board that individual schools and libraries are in the best position to evaluate the relative costs and benefits of different services and technologies.").

**V. Relief Sought**

- The District seeks an order transferring this matter (along with the exhibits and supporting arguments herein) back to the Administrator for a Supplemental Decision on Appeal without prejudice to the District's right under the Rules to a *de novo* review by the Commission of a Supplemental Decision by the Administrator.
  
- In the alternative, the District seeks:
  - (a) a decision from the Commission that the purchase, installation, and maintenance of all network electronics covered by the FRN constitutes "Internal Connections," as the Commission has defined that term;
  
  - (b) a decision from the Commission that "full funding" in this context means \$197,017.92 in universal service support, an amount based on the estimated prediscout cost set forth in the District's original Form 471, and not the reduced estimate set forth by mistake in the Form 471 Correction Form, which did not include additional charges for labor and materials to finalize the installation; and
  
  - (c) an order from the Commission directing the Administrator to fully fund all of the Internal Connections covered by the FRN.

Respectfully submitted,

WESTERN HEIGHTS PUBLIC SCHOOL DISTRICT

Date: 6-22-99

By:   
Joseph Kitchens, Superintendent

Western Heights Public School District  
8401 SW 44<sup>th</sup> Street  
Oklahoma City, OK 73045

## Certificate of Service

I, Charlene Shirey, a secretary for the Western Heights Public School District, do hereby certify that a copy of the foregoing, Request for Review, was served this 22<sup>nd</sup> day of June, 1999, via first class mail, postage prepaid, upon the following:

Universal Service Administrative Company  
Schools and Libraries Division  
Box 125 – Correspondence Unit  
100 South Jefferson Road  
Whippany, NJ 07981

Charlene Shirey  
XXXX XXXXXX

A

**EXHIBIT A**

**FCC Form 471 Filed April 13, 1999**



Contact Person's Name Joe Kitchens, Superintendent and Phone Number: (405) 745-6300

	Existing Services	Total Services After Order
<b>11. Telecommunications Services</b>		
a. Number of phones that have or require service (See instructions concerning extension phones and fax machines.)	50	122
b. Number of computers that have or require service		
c. Number of high bandwidth video conferencing links		
<b>12. Internal Connections</b>		
a. Number of buildings with at least some rooms connected	10	10
b. Number of rooms connected	230	230
c. Highest speed of connection	1000Mbps	1000Mbps
<b>13. Internet Access</b>		
a. Number of dial up connections		
b. Highest speed of such dial up connections		
c. Number of direct connections	1.5Mbps	100Mbps
d. Highest speed of such direct connections		

**Block 4: Determining Discount Percentage**

14. Fill in one line per school, library, or library consortium and calculate in the last line, an average discount rate for the billed entity. Attach additional pages if necessary. *Note:* If the applicant has already completed this chart for all of the same entities with data that is current, provide the "471 Application Number" (Item 3b), from that previous FCC Form 471 here: \_\_\_\_\_

(1) Name of Individual School or Library	(2) NCES or Comparable Code for School or Library (Obtain from Administrator)	(3) Urban or Rural	(4) <i>For Schools:</i> Number of Students <i>For Libraries:</i> NCES Code of a School in its District	(5) <i>For Schools:</i> Number of Students Eligible for National School Lunch Program	(6) Discount Calculated from Discount Matrix	(7) Check if School or Library will use "Shared Services" listed in Item 15.
Council Grove Elementary	40-32370-01789	urban	298	254	90%	[X]
John Glenn Elementary	40-32370-29717	urban	597	431	80%	[X]
Greenvale Elementary	40-32370-29718	urban	373	336	90%	[X]
Winds West Elementary	40-32370-29719	urban	313	244	90%	[X]
Western Heights Middle School	40-32370-29720	urban	779	559	80%	[X]
Western Heights High School	40-32370-29721	urban	793	350	60%	[X]
FOR SHARED SERVICES ORDERED BY BILLED ENTITY (attach worksheet of calculations)					78%	

Contact Person's Name Joe Kitchens, Superintendent and Phone Number: (405) 745-6300

**Block 5: Services Ordered**

15. "Shared" services: All EXCEPT site-specific, internal connections and dedicated ("private line") connections from only one school or library to an ISP or other end user.

(1)	(2)	CONTRACT			(6)	(7)	Amount		(10)	(11)
		(3)	(4)	(5)			(8)	(9)		
SLC Service Provider Number or Full Legal Name of Service Provider	Universal Service Control Number for Form 470 on which this is based	Contract Number (if applicable)	Award Date	Expiration Date	Services or Products	Service Start Date	Estimated One Time Pre-discount Cost	Estimated Monthly Pre-discount Cost	Estimated Total Annual Prediscount Cost	Percentage Discount (from Item 14)
(See Section 15 Attachment)					Telecommunications Services					
					Internet Access					
					Internal Connections (Shared)					
					Telecommunications Services					
					Internet Access					
					Internal Connections (Shared)					
					Telecommunications Services					
					Internet Access					
					Internal Connections (Shared)					

Contact Person's Name Joe Kitchens, Superintendent and Phone Number: (405) 745-6300

16. "Site Specific" Services: Internal connections not shared by multiple schools or libraries and dedicated ("private line") connections from only one school or library to an ISP or other end-user.

(1)	(2)	CONTRACT			(6)	(7)	Amount (See instructions about rounding)			(11)	(12)
SLC Number of Service Provider (Obtain from Service Provider)	Universal Service Control Number for Form 470 on which this is based	(3) Contract Number (if applicable)	(4) Award Date	(5) Expiration Date	Services or Products	Service Start Date	(8) Estimated One Time Pre-discount Cost	(9) Estimated Monthly Pre-discount Cost	(10) Estimated Total Annual Pre-discount Cost	Percent-age Dis-count (from Item 14)	School or Library Code (Listed on website)
(See Section 16 Attachment)					Dedicated Services						
					Internal Connections						
					Dedicated Services						
					Internal Connections						
					Dedicated Services						
					Internal Connections						
					Dedicated Services						
					Internal Connections						
					Dedicated Services						
					Internal Connections						

9

Contact Person's Name Joe Kitchens, Superintendent and Phone Number: (405) 745-6300

17.  Check this box to confirm that, for each service provider listed in 15 and 16, above, a list is attached (as an appendix to this form) of all of the services that each service provider is providing to the billed entity. Service providers should provide these lists on request.

18. a. Total dollars of support allocated for this application for the entire funding year (calculated by administrator)

b. Amounts of support set aside for this application for the first six months of the year (calculated by administrator)

19. Provide the total estimated cost (pre-discount price) for the services you expect to order in the funding year following the one for which you are applying here. (This figure is not binding.) 5250,000.00

20. Is your order solely for basic telephone service?  Yes  No

**Block 6: Certification and Signature**

21. The applicant is eligible for support because it includes: (Check one or both.)

a.  schools under the statutory definitions of elementary and secondary schools found in the Elementary and Secondary Education Act of 1965, 20 U.S.C. Secs. 8801 (14) and (25), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or

b.  libraries or library consortia eligible for assistance from a state library administrative agency under the Library Services and Technology Act of 1956 that do not operate as for-profit businesses and whose budgets are completely separate from any schools', including, but not limited to, elementary and secondary schools, colleges, or universities.

22. The school(s) or library(ies) I represent have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.

23. All of the individual schools, libraries, and library consortia listed above in items 15 and 16 are covered by:

a.  an individual, and/or

b.  higher-level technology plan(s) for using the services requested in this application (if those services consist of other than voice services).

24. Status of technology plans (check one):

a.  Technology plan(s) has/have been approved; or

b.  Technology plan(s) will be approved by a state or other authorized body; or

c.  Technology plan(s) will be submitted to Schools and Libraries Corporation for approval.

25. I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurements of services for which support is being sought.

26. I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

27. I understand 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.

28. I recognize that I may be audited pursuant to this application and will retain for five years any and all worksheets and other records that I rely upon to fill out this application.

29. I certify that I am authorized to submit this request on behalf of the above-named institution, that I have examined this request and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

30. Signature Joe Kitchens

31. Date 4-13-98

32. Printed name of authorized person Joe Kitchens

33. Title or position of authorized person Superintendent

Contact Person's Name Joe Kitchens, Superintendent and Phone Number (405) 745-6300

**Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.**

NOTICE TO INDIVIDUALS: Section 54.504 of the Federal Communication Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party of a proceeding before the body or has an interest in the proceeding.

If you owe a past due debt to the federal government, the taxpayer identification number (such as your social security number) and other information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized.

With the exception of your social security number, if you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Privacy Act of 1974, Pub. L. No. 93-579, December 31, 1974, 5 U.S.C. § 552, and the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, *et seq.*

Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, D.C. 20554.

This form should be submitted to: **Schools and Libraries Corporation**  
**P.O. Box 4217**  
**Iowa City, Iowa 52244-4217**  
**1-888-203-8100**

Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

*Section 14 Shared Services Discount Calculation Worksheet*

(1)  Name of Individual School or Library	(2)  NCES Comparable Code for School or Library (Obtain from Administrator)	(3)  Urban or Rural	(4)  <i>For Schools:</i> Number of Students <i>For Libraries:</i> NCES Code of a School in its District	(5)  <i>For Schools:</i>  Number of Students Eligible for National School Lunch Program	(6)  Discount Calculated from Discount Matrix	(7)  Column (4) Multiplied by Column (6)
Council Grove Elementary	40-32370-01789	urban	298	254	90%	268
John Glenn Elementary	40-32370-29717	urban	597	431	80%	478
Greenvale Elementary	40-32370-29718	urban	373	336	90%	336
Winds West Elementary	40-32370-29719	urban	313	244	90%	282
Western Heights Middle School	40-32370-29720	urban	779	559	80%	623
Western Heights High School	40-32370-29721	urban	793	350	60%	476
<b>TOTAL</b>			<b>3,153</b>			<b>2,462</b>

**Shared Services Discount Calculation**

Total of Column 7

2,462

÷ = 78%

Total of Column 4

3,153



Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

*Section 15 Description of Services*

Item #	Vendor	SPIN	Estimated Total Pre-Discount Cost	Funding Category	Description
1)	Southwestern Bell Telephone	143004662	\$ 17,687.18	Telecommunications	3 DID trunk groups
2)	Dan Dill Electric, Inc.	143008690	\$ 2,232.00	Internal Connections	Fiber optics for shared network equipment
3)	Integrative Solutions, Inc.	143006821	\$ 9,926.56	Internal Connections	Fiber optics for shared network equipment
4)	Lucent Technologies	143005196BCS	\$ 223,884.00	Internal Connections	Multimedia Communications eXchange Unit and a Definity Prologic PBX. This system will allow all classrooms to place voice and multimedia calls over the Internet and over the public switched telephone network
5)	Chickasaw Telecom Co.	143002379	\$ 35,250.00	Internet Access	100 Mbps Internet access for school network



Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

*Section 16 Description of Services*

Item #	School Name	NCES	Vendor	SPIN	Contract Number	Estimated Total Pre-Discount Cost	Funding Category	Description
1)	Western Heights High School	40-32370-29721	Dan Dill Electric, Inc.	143008690		\$ 2,750.00	Internal Connections	Fiber optic wiring for computer network
2)	Western Heights Middle School	40-32370-29720	Dan Dill Electric, Inc.	143008690		\$ 2,850.00	Internal Connections	Fiber optic wiring for computer network
3)	John Glenn Elementary	40-32370-29717	Dan Dill Electric, Inc.	143008690		\$ 2,690.00	Internal Connections	Fiber optic wiring for computer network
4)	Council Grove Elementary	40-32370-01789	Integrative Solutions, Inc.	143006821		\$ 2,138.32	Internal Connections	Fiber optic wiring for computer network
5)	Greenvale Elementary	40-32370-29718	Integrative Solutions, Inc.	143006821		\$ 2,265.72	Internal Connections	Fiber optic wiring for computer network
6)	Winds West Elementary	40-32370-29719	Integrative Solutions, Inc.	143006821		\$ 1,255.68	Internal Connections	Fiber optic wiring for computer network

Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

*Item 17 List of Services, Sorted by Eligibility and Site*

VENDOR: Southwestern Bell Telephone

SPIN: 143004662

**USF Eligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
Shared	3 DID trunk groups	Eligible	\$ 17,687.18	1	\$ 17,687.18

**USF Ineligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
(None)					

Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

*Item 17 List of Services, Sorted by Eligibility and Site*

VENDOR: Dan Dill Electric, Inc.

SPIN: 143004662

**USF Eligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
Shared	Fiber optic wiring for computer network	Eligible	\$ 2,232.00	1	\$ 2,232.00
Western Heights High School	Fiber optic wiring for computer network	Eligible	\$ 2,750.00	1	\$ 2,750.00
Western Heights Middle School	Fiber optic wiring for computer network	Eligible	\$ 2,850.00	1	\$ 2,850.00
John Glenn Elementary	Fiber optic wiring for computer network	Eligible	\$ 2,690.00	1	\$ 2,690.00

**USF Ineligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
(None)					

*Item 17 List of Services, Sorted by Eligibility and Site*

VENDOR: Integrative Solutions, Inc.

SPIN: 143006821

**USF Eligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
Shared	Fiber optic wiring for computer network	Eligible	\$ 9,926.56	1	\$ 9,926.56
Council Grove Elementary	Fiber optic wiring for computer network	Eligible	\$ 2,138.32	1	\$ 2,138.32
Greenvale Elementary	Fiber optic wiring for computer network	Eligible	\$ 2,265.72	1	\$ 2,265.72
Winds West Elementary	Fiber optic wiring for computer network	Eligible	\$ 1,255.68	1	\$ 1,255.68

**USF Ineligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
(None)					

Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

*Item 17 List of Services, Sorted by Eligibility and Site*

VENDOR: Lucent Technologies

SPIN: 143005196BCS

**USF Eligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
Shared	Multimedia Communications eXchange Unit and a Definity Prologic PBX. This system will allow all classrooms to place voice and multimedia calls over the Internet and over the public switched telephone network	Eligible	\$ 223,884.00	1	\$ 223,884.00

**USF Ineligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
(None)					

Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

*Item 17 List of Services, Sorted by Eligibility and Site*

VENDOR: Chiackasaw Telecom

SPIN: 143002379

**USF Eligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
Shared	100 Mbps Internet access for school network	Eligible	\$ 35,250.00	1	\$ 35,250.00

**USF Ineligible Services**

Site	Description	USF Eligibility	Estimated Unit Price	Quantity	Estimated Total
(None)					

**ANALYSIS OF NATIONAL SCHOOL LUNCH ELIGIBILITY**

**PREPARED FOR:**

**WESTERN HEIGHTS SCHOOL DISTRICT**

**8401 SW 44<sup>TH</sup> ST,**

**OKLAHOMA CITY, OK 73179**

**(405) 745-6300**

**PREPARED BY:**

**FUNDS FOR LEARNING**

**3030 NW EXPRESSWAY, SUITE 400**

**OKLAHOMA CITY, OK 73112**

**(405) 341-7003**

**JULY 7, 1998**

## **Introduction**

Western Heights School District, Oklahoma City, Oklahoma, requested that Funds For Learning review the district's eligibility for the National School Lunch Program ("NSLP"). The district believes that the number of students eligible for the NSLP is underreported at the district's middle school and high school. The purpose of this report is to more accurately calculate the district's NSLP eligibility by using the Department of Education's Feeder Pattern method.

## **Data**

For each school, the table below shows the total number of students and the number of students that are eligible for free and reduced-price lunches under the NSLP as of December 1, 1997.

<b>Name of Individual School or Library</b>	<b>Number of Students</b>	<b>Number of Students Eligible for National School Lunch Program</b>	<b>Percentage of Students Eligible for National School Lunch Program</b>
Council Grove Elementary	298	254	85.2%
John Glenn Elementary	597	431	72.2%
Greenvale Elementary	373	336	90.1%
Winds West Elementary	313	244	78.0%
Western Heights Middle School	779	559	71.8%
Western Heights High School	793	350	44.1%
<b>TOTAL</b>	<b>3153</b>	<b>2174</b>	

## **Feeder Pattern**

The U.S. Department of Education recognizes the Feeder Pattern method as a legitimate method to compensate for the under reporting of NSLP eligibility that typically occurs at middle schools and high schools. The Feeder Pattern is based on the assumption that middle schools and high schools should have NSLP eligibility rates similar to the elementary schools that feed into them. The middle school and high school NSLP

eligibility rates can then be calculated based on a student-weighted average of the eligibility rates at a district's elementary schools.

**Calculation**

The average NSLP eligibility at Western Heights' four elementary schools is 80%. This average is calculated in the table below by multiplying columns (2) and (3), summing column (4), and dividing the sum of column (4) by the sum of column (2).

(1)  Name of Individual School or Library	(2) Number of Students	(3) Percentage of Students Eligible for National School Lunch Program	(4) Column (2) Multiplied by Column (3)
Council Grove Elementary	298	85.2%	254
John Glenn Elementary	597	72.2%	431
Greenvale Elementary	373	90.1%	336
Winds West Elementary	313	78.0%	244
<b>TOTAL</b>	<b>1581</b>		<b>1265</b>

Sum of Column (4)	1265
Divided by Sum of Column (2)	1581
<b>Equals</b>	<b>80%</b>

**Revised Data**

Based on the Feeder Pattern method, 80% of the students at the middle school and high school are eligible for free and reduced-price lunches. The following table shows the district's revised number of NSLP eligible students. The revised eligibility information at the middle school and high school affects Western Heights' Universal Service Funding ("e-rate") discount level. The district's revised discount calculation is attached as an exhibit to this report.

<b>Name of Individual School or Library</b>	<b>Number of Students</b>	<b>Percentage of Students Eligible for National School Lunch Program</b>	<b>Number of Students Eligible for National School Lunch Program</b>
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John Glenn Elementary	597	72.2%	431
Greenvale Elementary	373	90.1%	336
Winds West Elementary	313	78.0%	244
Western Heights Middle School	779	80.0%	623
Western Heights High School	793	80.0%	634
<b>TOTAL</b>	<b>3153</b>		<b>2523</b>

**EXHIBIT 1 – REVISED SHARED SERVICES DISCOUNT CALCULATION**

Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

*Section 14 Shared Services Discount Calculation Worksheet*

(1)  Name of Individual School or Library	(2)  NCES Comparable Code for School or Library (Obtain from Administrator)	(3)  Urban or Rural	(4)  <i>For Schools:</i> Number of Students <i>For Libraries:</i> NCES Code of a School in its District	(5)  <i>For Schools:</i> Number of Students Eligible for National School Lunch Program	(6)  Discount Calculated from Discount Matrix	(7)  Column (4) Multiplied by Column (6)
Council Grove Elementary	40-32370-01789	urban	298	254	90%	268
John Glenn Elementary	40-32370-29717	urban	597	431	80%	478
Greenvale Elementary	40-32370-29718	urban	373	336	90%	336
Winds West Elementary	40-32370-29719	urban	313	244	90%	282
Western Heights Middle School	40-32370-29720	urban	779	623	90%	701
Western Heights High School	40-32370-29721	urban	793	634	90%	714
<b>TOTAL</b>			<b>3,153</b>			<b>2,778</b>

**Shared Services Discount Calculation**

Total of Column 7

2,778

÷ = 88%

Total of Column 4

3,153



COPY

**SANDY GARRETT**  
**STATE SUPERINTENDENT OF PUBLIC INSTRUCTION**  
**OKLAHOMA STATE DEPARTMENT OF EDUCATION**

July 13, 1998

Heather Wi  
NECA  
100 South Jefferson Road  
Whippany, New Jersey 07981

**RE: Western Heights School District (D005858, D005859, D005860)**

Dear Ms. Wi:

I have reviewed the revised free and reduced lunch eligibility data submitted for Western Heights High School and Middle School. Using the U. S. Department of Education's Feeder Pattern Method, I am convinced that the attached report accurately depicts the potential number of eligible free and reduced students in attendance at both Western Heights Middle School and Western Heights High School. Thank you very much for consideration of this issue.

Sincerely,

Dee Baker, Executive Director  
Child Nutrition Programs

lh

# WESTERN HEIGHTS SCHOOL DISTRICT NO. I-41

8401 S.W. 44th  
Phone (405) 745-6300

Oklahoma City, OK 73179  
FAX (405) 745-6322

Office of the Superintendent

July 13, 1998

Heather Wi  
NECA 100 South Jefferson Road  
Whippany, New Jersey 07981

**RE: WESTERN HEIGHTS SCHOOL DISTRICT (D005858, D005859, D005860)**

Ms. Wi:

Western Heights School District has reviewed the National School Lunch Program ("NSLP") eligibility as reported in the Forms 471 the District has filed with the SLC.

Upon review of the NSLP eligibility information, the district has determined that the number of students reported as being eligible for free and reduced-price lunches at Western Heights Middle School and Western Heights High School is lower than the actual number of eligible students. Using the U. S. department of Education's Feeder Pattern Method, the middle school and high school should have 623 and 634 students eligible for free and reduced-price lunches, respectively.

Attached is a report that outlines the methodology used to calculate the revised eligibility figures. The report also includes a revised version of the Item 14, Shared Services Discount Calculation Worksheet.

I have also attached a letter of support for the revised figures from Dee Baker, Executive Director of Child Nutrition Services with the Oklahoma State Department of Education.

If you have any questions about this report, feel free to contact me.

Sincerely,



Joe Kitchens  
Superintendent of Schools

# ANALYSIS OF NATIONAL SCHOOL LUNCH ELIGIBILITY

PREPARED FOR:

WESTERN HEIGHTS SCHOOL DISTRICT

8401 SW 44<sup>TH</sup> ST,

OKLAHOMA CITY, OK 73179

(405) 745-6300

PREPARED BY:

FUNDS FOR LEARNING

3030 NW EXPRESSWAY, SUITE 400

OKLAHOMA CITY, OK 73112

(405) 341-7003

JULY 7, 1998

## Introduction

Western Heights School District, Oklahoma City, Oklahoma, requested that Funds For Learning review the district's eligibility for the National School Lunch Program ("NSLP"). The district believes that the number of students eligible for the NSLP is underreported at the district's middle school and high school. The purpose of this report is to more accurately calculate the district's NSLP eligibility by using the Department of Education's Feeder Pattern method.

## Data

For each school, the table below shows the total number of students and the number of students that are eligible for free and reduced-price lunches under the NSLP as of December 1, 1997.

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<b>TOTAL</b>	<b>3153</b>	<b>2174</b>	

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Western Heights High School	793	80.0%	634
<b>TOTAL</b>	<b>3153</b>		<b>2523</b>

Contact Person's Name: Joe Kitchens, Superintendent

and Phone Number: (405) 745-6300

**Section 14 Shared Services Discount Calculation Worksheet**

(1)  Name of Individual School or Library	(2)  NCES Comparable Code for School or Library (Obtain from Administrator)	(3)  Urban or Rural	(4)  <i>For Schools:</i> Number of Students <i>For Libraries:</i> NCES Code of a School in its District	(5)  <i>For Schools:</i>  Number of Students Eligible for National School Lunch Program	(6)  Discount Calculated from Discount Matrix	(7)  Column (4) Multiplied by Column (6)
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Western Heights High School	40-32370-29721	urban	793	634	90%	714
<b>TOTAL</b>			<b>3153</b>			<b>2,778</b>

Shared Services Discount Calculation

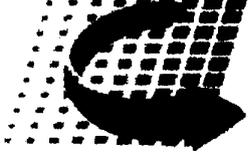
Total of Column 7

2,778

+ = 88%

Total of Column 4

3,153



**FUNDS FOR  
LEARNING, LLC**  
BRINGING TECHNOLOGY TO THE CLASSROOM

**FAX TRANSMITTAL**

To: Brendon Gaffey	Date: 08/11/98
Firm: NECA/SLC	
Fax Number: (973) 581-6759	Number of Pages Including Cover: 5
From: John D. Harrington	Phone: (405) 341-7003 Email: <a href="mailto:jharrington@fundsforlearning.com">jharrington@fundsforlearning.com</a>
Re: Western Heights School District	CC: <u>Joe Kitchens</u> Orin Heend
<input type="checkbox"/> Urgent <input checked="" type="checkbox"/> For Review <input type="checkbox"/> Please Comment <input checked="" type="checkbox"/> Please Reply <input type="checkbox"/> Please Recycle	
<p>Attached is the NSLP eligibility information for Winds West Elementary in the Western Heights School District, Oklahoma City, OK. As of November 30, 1998, Winds West had 244 students eligible for the National School Lunch Program. 197 students were eligible for free lunch and 47 students were eligible for reduced-price lunch.</p> <p>Please let me know if you have any further questions concerning Western Heights' applications.</p>	

If you do not receive all of the pages or have received this fax in error, please call the above person at the number indicated. Thank you.

**FUNDS FOR LEARNING, LLC**  
[www.fundsforlearning.com](http://www.fundsforlearning.com)

1899 L Street, NW  
Suite 500  
Washington, DC 20036  
(202) 463-3651  
(202) 872-0896 (fax)

3030 Northwest Expressway  
Suite 400  
Oklahoma City, OK 73112  
(405) 341-7003  
(405) 971-7685 (fax)

SP-6  
Rev. 5/96

State Superintendent of Public Instruction  
Oklahoma State Department of Education  
Child Nutrition Program Claim For Federal Reimbursement 1997-1998

District 1-41 School	OKLAHOMA COUNTY County	11 Month	1997 Year	SS-04 Agreement Number
<b>1. GENERAL DATA</b>				
(a) Number Of Schools Participating		Lunch 6	Breakfast 0	Severe Need 6
(b) Number of Students - Free		1809	0	1809
(c) Number Of Students - Reduced		365	0	365
(d) Days operated this claim period		17	0	17

Lunches Served

(a) Free	21,934 X \$ 1.9100 =	41,893.94	Lunch Reimbursement	49,500.10
(b) Reduced Price	4,136 X \$ 1.5100 =	6,245.36	State Use Only	
(c) Paid Lunches	6,804 X 0.2000 =	1,360.80	Adjustment	
(d) Total	32,874		Warrant Amount	
(e) Adults	1,408			
(f) Contract		0		

3. Breakfast Served

Regular Breakfast Served		DO NOT INCLUDE SEVERE NEED BREAKFAST SITES		
(a) Free	0 X \$ 0.0000 =	0.00		
(b) Reduced Price	0 X \$ 0.0000 =	0.00		
(c) Paid	0 X 0.2000 =	0.00		
(d) Total	0	0.00		
(e) Adults	0			
(f) Contract		0	Req. Brk. Reimburs	
Severe Need Breakfast Served		DO NOT INCLUDE REGULAR BREAKFAST SITES		
(a) Free	11,674 X \$ 1.2450 =	14,534.13	Breakfast Reimbursement	16,001.86
(b) Reduced Price	1,234 X \$ 0.9450 =	1,166.13	State Office Use Only	
(c) Paid	1,508 X 0.2000 =	301.60	Adjustment	
(d) Total	14,416	16,001.86	Warrant Amount	
(e) Adults	61			
(f) Contract		0	SNB Reimburse.	

4. Special Milk Program (Refer to Special Milk Program Claim)	Special Milk Reimbursement	0.00
	State Office Use Only	
	Special Milk Adjustment	
	Warrant Amount	

5. Total Reimbursement	65,001.96	State Office Use Only	Adjustment total	Total Warrants
------------------------	-----------	-----------------------	------------------	----------------

I certify that, to the best of my knowledge and belief, this report is true and correct in all respects, is in accordance with the terms of existing agreements, and that payment thereof has not been received. I understand that the records on which the claim is based must be available for federal or state audit or review for three years.

- Check When First Claim for 1997-1998 school year is submitted
- Check When Final Claim for 1997-1998 school year is submitted

return to:

Oklahoma State Department of Education  
Child Nutrition Program  
300 North Lincoln Boulevard, Room 310  
Oklahoma City, Oklahoma 73105-4899  
Telephone Number (405)521-3327

Signature Of Authorized Representative

*Joe Hiteh*  
11-30-98  
Date

Daily Consolidated 9 Range Report  
 Date Range: 11/01/97 To 11/30/97

06/12/98  
 UKCNK9RG

Attendance 48,289 Lunch Days 17 Average Attendance 2,841  
 Breakfast Days 0 Severe Need Breakfast Days 17

		Lunch	Breakfast	
Reduced Eating Free	0		0	
Reduced Meals	4,136	1,034.00	0	0.00
Free Sec. 11 Meals	21,934		0	
Sev Need Reduced Eating Free			0	
Reduced Severe Need Breakfasts			1,234	370.20
Free Severe Need Breakfasts			11,674	
Group 1 Paid Students	6,761	8,762.70	1,504	977.60
Group 2 Paid Students	0	0.00	0	0.00
Group 3 Paid Students	7	8.40	0	0.00
Group 4 Paid Students	0	0.00	0	0.00
Group 5 Paid Students	36	43.20	4	2.60
Free Meals Not Sec. 11	0		0	
<b>Total Student Meals</b>	<b>32,874</b>	<b>9,848.30</b>	<b>14,416</b>	<b>1,350.40</b>
Eligible Adult Meals	1,381	2,692.95	58	51.80
At Cost Adult Meals	27	59.40	3	3.15
0.90 Breakfasts			3	3.15
0.80 Breakfasts			0	0.00
Lunch Room Staff Meals	15		7	
Total Adult Meals	1,423	2,752.35	68	54.95
Total Contract Meals	0	0.00	0	0.00
<b>Total Meals Served</b>	<b>34,297</b>		<b>14,484</b>	
Extras Sold	6,996	3,094.40	2,094	619.95
A La Carte Items Sold	0	0.00	0	0.00
Average Participation	1.934		0	
Average Participation Severe Need			848	
Cash Income Students		3,051.57		445.36
Cash Income Contract Meals		0.00		0.00
Cash Income Eligible Adults		1,000.07		38.35
Cash Income At Cost Adults		59.55		2.75
<b>Total Cash Income Each Meal</b>		<b>4,091.19</b>		<b>486.46</b>
Cash Income Prepayments Students		9,740.45		
Cash Income Prepayments Adults		2,963.06		
Additional Cash		150.00		
<b>Total Of Cash Income</b>		<b>17,431.16</b>		
Total Deposit Amount		17,281.16		
Difference		150.00	Short	

School	Free	Reduced	S.N.
00001 Western Heights High School	272	78	Y
00002 Western Heights Jr. High	453	106	Y
00003 Council Elementary	230	24	Y
00004 Greenvale Elementary	290	48	Y
00005 John Glenn Elementary	367	64	Y
00006 WINDS WEST ELEMENTARY	197	47	Y
00007 Western Heights Warehouse	0	0	
00008 Western Heights Transportation	0	0	
00009 Western Heights Administration	0	0	
00010 Western Heights Custodial	0	0	
00011 Greenvale 2	0	0	
00012 High School 2	0	0	
00013 Western Heights Food Service	0	0	
00014 Security	0	0	
00015 Western Heights Jr. High	0	0	
00016 WESTERN HEIGHTS ATHLETICS	0	0	
00017 Western Heights Home Ec.	0	0	
00018 Winds West Elementary	0	0	
00019 Council Grove	0	0	
00020 Western Heights High School	0	0	
00021 John Glenn Elementary	0	0	
00022 Alternative Education	0	0	
Total Applications	1,809	365	
Bevers Need	1,809	365	
NonBevers Need	0	0	

School/SFA Edit Check Worksheet

OKCRSFA

06/12/98

6

WINDS WEST ELEMENTARY

Attendance Factor 9420

000006

WINDS WEST ELEMENTARY

Month - November BREAKFAST

Day	Free Meals			Reduced Meals			Paid Meals			Total Claim	Daily Atten	
	Elg. x AF	AF	Claim	Elg. x AF	AF	Claim	Elg. x AF	AF	Claim			
3	181	171	75	43	41	15	81	76	31	121	290	
4	183	172	79	43	41	16	79	74	31	126	291	
5	185	174	69	43	41	9	77	73	21	99	296	
6	189	178	67	45	42	18	71	67	29	114	290	
7	190	179	72	45	42	18	70	66	32	122	284	
10	190	179	56	45	42	16	70	66	25	97	286	
11	190	179	60	45	42	17	70	66	27	104	292	
12	190	179	75	45	42	19	70	66	37	131	298	
13	190	179	71	45	42	20	70	66	29	120	298	
14	191	180	62	45	42	15	69	65	29	106	281	
17	191	180	61	45	42	17	69	65	36	114	281	
18	192	181	77	46	43	21	67	63	30	128	288	
19	195	184	64	46	43	13	64	60	20	97	285	
20	198	185	66	47	44	13	62	58	39	118	294	
21	197	186	58	47	44	17	61	57	28	103	293	
24	197	186	74	47	44	13	61	57	31	118	280	
25	197	186	60	47	44	16	61	57	28	104	282	
<b>Monthly Totals</b>			1146				273				503	1922

Signature

*Joe Withers*

Date

11-30-98

6