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MAY 19 2000 Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

FCC MAIL ROOM

\_\_\_\_\_  
In the matter of: )  
Request for Review by )  
Buffalo & Erie County Public Library of )  
Decision of Universal Service Administrator )  
\_\_\_\_\_ )

Docket Nos. 97-21 and 96-45

The Buffalo and Erie County Public Library ("B&ECPL") hereby requests a review of an Administrator's appeal decision regarding library funding requests made by B&ECPL (Entity No. 124851, Funding Request Numbers: 209823, 209825, 209829, 209833, 209854, 209858, 209860, 209864, 209960, 209962, 209963, 209965, 209968, 209971, 209974, 209976 and 209980).

In a letter dated April 25, 2000, the Universal Service Administrative Company denied in full B&ECPL's appeal of an earlier Administrator funding decision for the second program year.

History:

In its original Form 471 application (Application Number 137691), B&ECPL requested a discount to "Purchase and install Cisco 2501 router software maintenance for Y2K" for seventeen library outlets; and "Purchase and install Cisco 2501 router Flash memory upgrades (required for Y2K software upgrade)" for 16 library outlets. Pre-discount costs for the 16 libraries receiving both software maintenance and flash

upgrades totaled \$507.50 each, while one library outlet receiving only the software maintenance had a total pre-discount cost of \$247.50. A copy of this Form 471 is attached as Exhibit A.

In a "Funding Commitment Decision Letter" dated November 2, 1999, the Universal Service Administrator (Schools & Libraries Division) denied each funding request as follows: "Funding Commitment Decision: \$0.00 – Incl. Svcs./ or product(s) Funding Commitment Decision Explanation: 30% or more of this FRN includes a request for Y2K & Cisco 2500 series routers which is an ineligible product(s) or service(s) based on program rules." A copy of this FCD letter is attached as Exhibit B.

B&ECPL staff reviewed the Eligible Services List posted on the [www.universalservice.org](http://www.universalservice.org) web site on November 15, 1999 and found no reference to either routers or Y2K being "ineligible product(s) or service(s)". A copy of this document is attached as Exhibit C.

Based upon this review, in a timely letter dated November 18, 1999, B&ECPL filed an appeal to the Schools and Libraries Division, which was delivered by Federal Express on November 19, 1999. The basis of the appeal centered on the performance-based need for the memory upgrades and router maintenance as well as that, according to program rules published at that time, routers were indeed an eligible product. Hence, memory upgrades and router operating software were also eligible. A copy of the November 18, 1999 appeal letter is attached as Exhibit D.

In a letter dated April 25, 2000, the Universal Service Administrative Company denied in full B&ECPL's appeal as follows: "Decision on Appeal: Denied in full. Denial

Reason(s): - Based on the documentation submitted by the applicant, the services requested are for the maintenance and memory upgrades of Cisco 2500 Series routers, which are remote access routers. Since remote access routers are ineligible products per program rules, maintenance and memory upgrades associated with these routers are also ineligible.” A copy of this letter is attached as Exhibit E.

The April 25, 2000 letter is the first time we were informed that the reason for denial involved “remote access routers”. There is no mention of “remote access routers” in the eligible services list (Exhibit C) at the time B&ECPL filed its appeal. A new section titled “Remote Access Router” does appear in the “Schools and Libraries Eligibility List” maintained on the [www.universalservice.org](http://www.universalservice.org) web site as “1999 Final Approved Document” dated December 2, 1999. A copy of pages 1 and 24 of this 36-page document is attached as Exhibit F. As an aside, page one of this document states that “Items in **Bold** indicate an addition or modification of a product or service.” However, the new “Remote Access Router” section is not so bolded.

A “Remote Access Router” is defined in this new section as: “A router on a LAN with a digital data service unit/channel service unit (DSU/CSU) built in for dial up or remote access of a network.” It is classified as not eligible citing paragraphs 459 and 460 from FCC97-157 and FCC 97-420.

The Cisco 2501 routers purchased by B&ECPL **DO NOT** contain a built in DSU/CSU. Each 2501 router is a *single LAN router* configured with the most basic operating system feature set, *IP only*. According to information found at the Cisco web site, <http://www.cisco.com> , there are over 25 different models in the 2500 series. The

model 2501 is clearly identified as a "Single LAN router" in this documentation. A copy of relevant pages from this web site are attached as Exhibit G.

Each of B&ECPL's library outlets is connected to the Central Library and the Internet utilizing a separate DSU/CSU unit that connects to a frame relay line "leased" from Bell Atlantic, DBA New York Telephone, an eligible telecommunications service provider providing B&ECPL an eligible telecommunications service under the provisions of the Universal Service program rules. A copy of our most recent telephone bill for frame relay services to all of our outlets is attached as Exhibit H. Further, the routers' configuration and equipment does not allow for dial-up access to the library outlets. *The 2501 routers as purchased, installed and used by B&ECPL, do not and can not perform remote access functions.*

**Discussion:**

The question before the Commission in this appeal is: Should the Universal Service Administrator be allowed to deny funding for services involving a router simply because some models of the router series in question are capable of providing remote access, even when the individual model purchased and its use by the library is solely for eligible services?

The key points in this case are as follows:

1. While the Cisco 2500 router series contains models that can function as remote access routers, the model 2501 purchased by B&ECPL does not contain a DSU/CSU and

does not function as a remote access router. Further, the "*IP only*" operating software purchased with the unit does not support remote access.

2. B&ECPL uses the router as a "Single LAN router" routing traffic only amongst equipment located within the individual library in which it is located.
3. A physically separate DSU/CSU unit, located in each library outlet, provides the interface between each library outlet's LAN, B&ECPL's Central Library and the Internet using frame relay lines "leased" from Bell Atlantic, DBA New York Telephone, an eligible telecommunications service provider, providing B&ECPL an eligible telecommunications service under the provisions of the Universal Service program rules.
4. The Universal Service Administrative Company's denial of funding based upon the potential capabilities of a router family of products rather than the capabilities, configuration, and use of the specific router purchased, would result in the arbitrary disqualification of numerous products and therefore numerous school and library funding requests that, in actuality, are providing eligible services to eligible, and in many cases, very needy applicants. In B&ECPL's case, this includes seven libraries serving the City of Buffalo (85% discount as poverty levels are high), two in the 50% discount band, and eight in the 40-48% band.

Statement of relief sought:

In this specific case, and for E-rate purposes, we ask that the Commission find that: the Cisco 2501 router as purchased and used by B&ECPL constitutes an eligible product/service; that the router memory upgrades and maintenance requested are therefore also eligible; that the actual configuration and use of routers be the primary factors in determining eligibility rather than the potential capabilities of the router family in general; that the Universal Service Administrator's denial of funding for all the FRNS listed above be reversed; and that funding be approved as requested by B&ECPL.

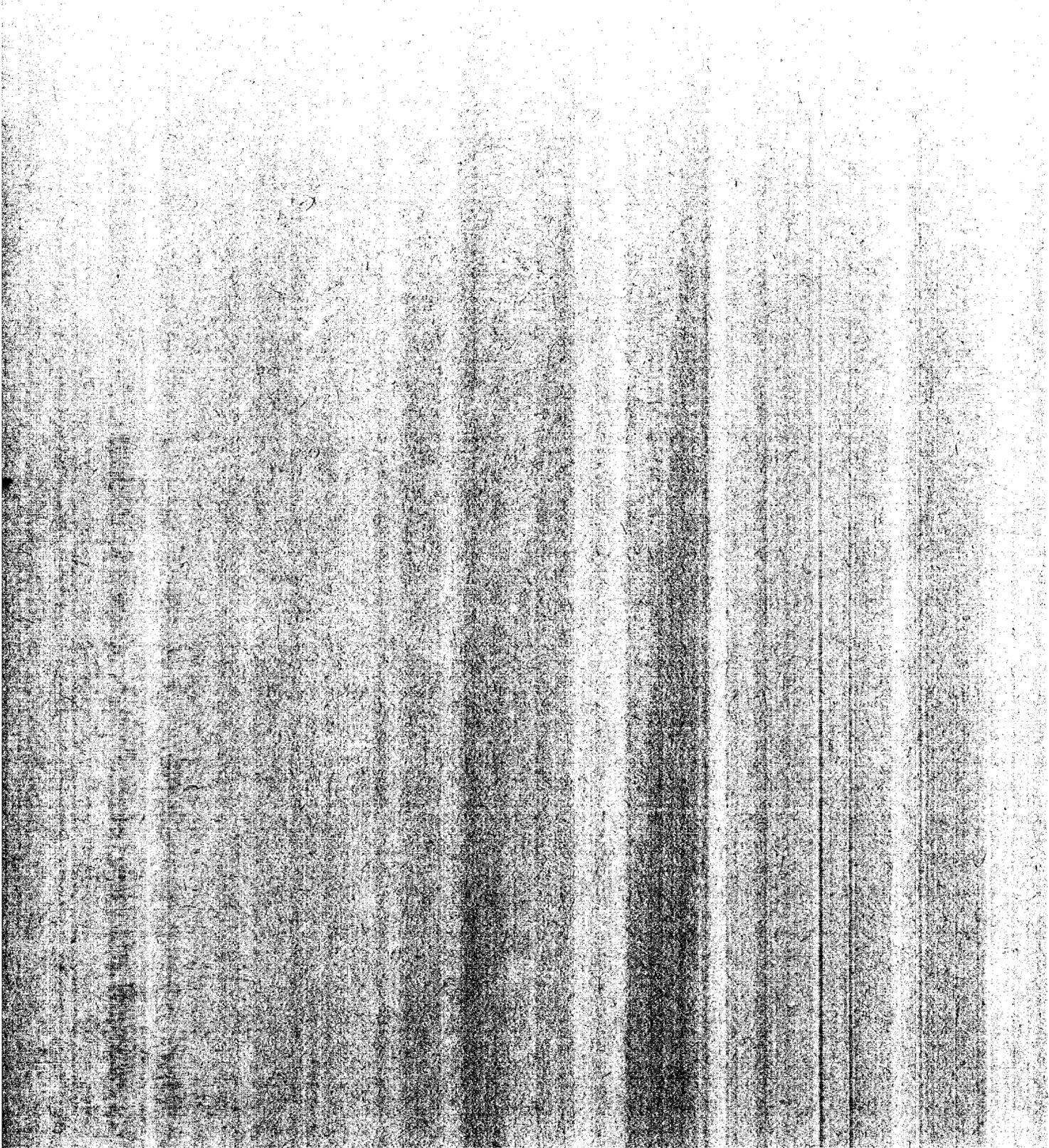
Respectfully submitted,

By: 

Kenneth H. Stone  
Deputy Director – CFO  
Buffalo & Erie County Public Library  
1 Lafayette Square  
Buffalo, NY 14203-1887

Dated: May 18, 2000

Exhibits



FCC Form

471

# Schools and Libraries Universal Service Services Ordered and Certification Form

Estimated Average Burden Hours Per Response: 6 hours

This form asks schools and libraries to list the eligible telecommunications-related services they have ordered and estimate the annual charges for them so that the Schools and Libraries Corporation can set aside sufficient support to reimburse providers for services.

**Please read instructions before completing.** (To be completed by each Billed Entity)

**Block 1: Applicant Address and Identifications** (School, library, or consortium desiring Universal Service funding.)

<b>1. Name of Applicant (Billed Entity)</b> Buffalo & Erie County Public Library	<b>2. Funding Year</b> July 1, 1999 - June 30, 2000
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**3a. NCES School Code (if individual school) or NCES Library Code (if individual library)**

<b>3b. 471 Application Number (Administrative use only)</b>	<b>3c. Billed Entity Number</b> 124851
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<b>4a. Type of Applicant</b> (Check only one box) <input type="checkbox"/> school <input type="checkbox"/> school district <input checked="" type="checkbox"/> library or library consortium under the LSTA <input type="checkbox"/> consortium of multiple entities	<b>4b. If applicant is a consortium, check all other boxes that apply:</b> <table style="width: 100%;"> <tr> <td><input type="checkbox"/> includes non-government entities ineligible for support</td> <td><input type="checkbox"/> state educational agency</td> </tr> <tr> <td><input type="checkbox"/> region of a state    <input type="checkbox"/> statewide    <input type="checkbox"/> multi-state</td> <td><input type="checkbox"/> local educational agency</td> </tr> <tr> <td></td> <td><input type="checkbox"/> educational services agency</td> </tr> </table>	<input type="checkbox"/> includes non-government entities ineligible for support	<input type="checkbox"/> state educational agency	<input type="checkbox"/> region of a state <input type="checkbox"/> statewide <input type="checkbox"/> multi-state	<input type="checkbox"/> local educational agency		<input type="checkbox"/> educational services agency
<input type="checkbox"/> includes non-government entities ineligible for support	<input type="checkbox"/> state educational agency						
<input type="checkbox"/> region of a state <input type="checkbox"/> statewide <input type="checkbox"/> multi-state	<input type="checkbox"/> local educational agency						
	<input type="checkbox"/> educational services agency						

**5. Applicant's Street Address, P.O. Box, or Route Number**

1 Lafayette Square

City Buffalo	State NY	Zip Code 14203	Telephone Number 716 858-8942	E-mail Address whelans@buffalolib.org
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**6. Contact Person's Name**

Shirley P. Whelan

Street Address, P.O. Box, or Route Number (if different from Item 5)

City	State	Zip Code
------	-------	----------

Fill in all of the following (if available), and check the preferred mode of contact:     Telephone 716 858-8942

FAX 716 858-6544     E-mail whelans@buffalolib.org     Mail

**Block 2: Purpose of Request**

**7 Purpose of Request: (Check all that apply, if any.)**

- a.  Discount on contract(s) signed prior to a request being posted on the Administrator's website.  
 Was an FCC Form 470 filed with regard to all the contract(s)?     Yes     No
- b.  Discount on contract(s) signed after a request being posted on the Administrator's website.
- c.  Minor modifications or supplement to existing contract(s) for which a Form 471 was already filed.  
 471 Application Number \_\_\_\_\_

**Block 3: Characteristics of Applicant and Applicant's Service Order (derived from FCC Form 470 Blocks 2 & 3)**

<b>8a. Number of students</b> _____	<b>8b. Number of library patrons</b> 952205
<b>9. Number of buildings to be served</b> 52	<b>10. Number of rooms to be served</b> 321

Contact Person's Name **Shirlev P. Whelan**

and Phone Number: **716 858-8942**

	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.)		
b. Number of computers that have or require service	587	846
c. Number of high bandwidth video conferencing links		
<b>12. Internal Connections</b>		
a. Number of buildings with at least some rooms connected	52	52
b. Number of rooms connected	100	164
c. Highest speed of connection	T-1	T-1
<b>13. Internet Access</b>		
a. Number of dial up connections		
b. Highest speed of such dial up connections		
c. Number of direct connections		
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.
(See attached)						[ ]
						[ ]
						[ ]
						[ ]
						[ ]
						[ ]
FOR SHARED SERVICES ORDERED BY BILLED ENTITY (attach worksheet of calculations)						

**Block 4: Determining Discount Percentages**

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 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.
Audubon Branch (Amherst Public Library)	15538	Urban	3631470 - 04213		40%	[ ]
Cazenovia Branch (City of Buffalo)	15347	Urban	3605850 - 00311		85%	[ ]
Clearfield Branch (Amherst Public Library)	15449	Urban	3631470 - 04215		40%	[ ]
Concord Public Library	124830	Urban	3612990 - 01066		46%	[ ]
Crane Branch (City of Buffalo)	15471	Urban	3605850 - 00311		85%	[ ]
East Aurora Branch (Aurora Town Pub. Lib.)	173155	Urban	3609540 - 00727		41%	[ ]
Fronczak Branch (City of Buffalo)	15366	Urban	3605850 - 00311		85%	[ ]
Grand Island Memorial Library	124799	Urban	3607020 - 00493		41%	[ ]
Hamburg Branch (Hamburg Public Library)	15155	Urban	3613350 - 01098		42%	[ ]
Julia B. Reinstein Branch (Chktwaga Pub. Lib.)	163580	Urban	3607230 - 00511		50%	[ ]
Kenmore Branch (Town of Ton. Pub. Lib.)	15421	Urban	3616230 - 01412		48%	[ ]
Kensington Branch (City of Buffalo)	15394	Urban	3605850 - 00311		85%	[ ]
Lackawanna Public Library	124855	Urban	3616440 - 01452		85%	[ ]
Martin L. King Branch (City of Buffalo)	15311	Urban	3605850 - 00311		85%	[ ]
Orchard Park Public Library	124830	Urban	3621900 - 03111		40%	[ ]
Reinstein Memorial Library (Chkt. Pub. Lib.)	15817	Urban	3607230 - 04581		50%	[ ]
Riverside Branch (City of Buffalo)	15325	Urban	3605850 - 00311		85%	[ ]
FOR SHARED SERVICES ORDERED BY BILLED ENTITY (attach worksheet of calculations)						

Contact Person's Name **Shirley P. Whelan**

and Phone Number: **716 858-8942**

**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)
SLC Service Provider Number or Full Legal Name of 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	Estimated Total Annual Prediscount Cost	Percentage Discount (from Item 14)	
					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 **Shirley P. Whelan**

and Phone Number: **716 858-8942**

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)
		(3)	(4)	(5)			(8)	(9)	(10)		
SLC Number of Service Provider (Obtain from 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 Pre-discount Cost	Percentage Discount (from Item 14)	School or Library Code (Listed on website)
IKON Business Systems					Dedicated Services						
Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	40%	15538 Audubon Br (Amherst Public Library)
IKON Business Systems					Dedicated Services						
Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$247.50	\$0.00	\$247.50	40%	15449 Clearfield Br (Amherst Public Library)
IKON Business Systems					Dedicated Services						
Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	40%	124830 Orchard Park Public Library
IKON Business Systems					Dedicated Services						
Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	41%	173155 East Aurora Br (Aurora-Town Pub Lib)
IKON Business Systems					Dedicated Services						
Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	41%	124799 Grand Island Mem. Library

Continued on Section 16 Attachment

Contact Person's Name: Shirley P. Whelan and Phone Number: 716 858-8942

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)
		(3)	(4)	(5)			(8)	(9)	(10)		
S.L.C. Number of Service Provider (Obtain from 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 Pre-discount Cost	Percentage Discount (from Item 14)	School or Library Code (Listed on website)
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	42%	15155 Hamburg Library
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	46%	124839 Concord Public Library
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	48%	15421 Kenmore Br (Twn of Tonawanda Pub Lib)
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	50%	163580 JBR Br (Cheektowaga Public Library)
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	50%	15817 Reinstein Br (Cheektowaga Public Library)
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	85%	15347 Cazenovia Br (City of Buffalo)
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	85%	15471 Crane Br (City of Buffalo)
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	85%	15366 Fronczak Br (City of Buffalo)
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	85%	15394 Kensington Br (City of Buffalo)
IKON Business Systems Spin No. 143007962	134830000164784	PT00313	08/01/1996	07/31/2000	Internal Connections	07/01/1999	\$507.50	\$0.00	\$507.50	85%	15311 Martin Luther King Br (City of Buffalo)



Contact Person's Name Shirley P. Whelan and Phone Number: 716 858-8942

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) \$ 8,785

b. Amount 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.)

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 1996 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 Shirley P. Whelan 31. Date 4/1/1999

32. Printed name of authorized person Shirley P. Whelan

33. Title or position of authorized person Deputy Director, Corporate Information Officer

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.

Contact Person's Name Shirley P. Whelan and Phone Number 716 858-8942

**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: **SLC Form 471**  
**P.O. Box 7026**  
**Lawrence, Kansas 66044-7026**  
**1-888-203-8100**

If sent by express delivery services or U.S. Postal Service, Return Receipt Requested, the form should be mailed to:

**SLC Form 471**  
**c/o Ms. Smith**  
**3833 Greenway Drive**  
**Lawrence, Kansas 66046**  
**1-888-203-8100**

Attachment for Item 14  
**Library Discount Rate Calculations**

**Contact Name:** Shirley P Whelan  
**Contact Telephone Number:** (716) 858-8942  
**Library Name (Billed Entity):** Buffalo & Erie County Public Library  
**Universal Service Control Nbr:** 134830000164784  
**Form 471 Application Number:**

Community	Library/Branch Name	School District Serving Library	District Discount (from attached schedules)
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Amherst	Audubon Library	Williamsville Central	1 40%
Amherst	Clearfield Branch	Williamsville Central	1 40%
Orchard Park	Orchard Park Public Library	Orchard Park CSD	1 40%
Aurora	East Aurora Library	East Aurora Union Free	1 41%
Grand Island	Grand Island Memorial Library	Grand Island Central	1 41%
Hamburg	Hamburg Library	Hamburg Central	1 42%
Concord	Town of Concord Public Library	Springville-Griffith Inst CSD	1 46%
Town of Tonawanda	Kenmore Library	Kenmore-Town of Tonawand	1 48%
Cheektowaga	Julia Boyer Reinstein Library	Cheektowaga Central	1 50%
Cheektowaga	Reinstein Memorial Branch	Cheektowaga Central	1 50%
Buffalo	Cazenovia Branch	Buffalo City School District	1 85%
Buffalo	Crane Branch	Buffalo City School District	1 85%
Buffalo	Fronczak Branch	Buffalo City School District	1 85%
Buffalo	Kensington Branch	Buffalo City School District	1 85%
Buffalo	Martin Luther King Branch	Buffalo City School District	1 85%
Buffalo	Riverside Branch	Buffalo City School District	1 85%
Lackawanna	Lackawanna Public Library	Lackawanna City SD	1 85%

<b>Sum of Discounts:</b>	Divide by		<b>=</b>	<b>61%</b> <i>AVERAGE</i> (Sum of Discounts Per Library divided by number of libraries)
	<b>1030%</b>	<b># of Libraries</b> 17		

## Library Discount Rate Calculation Detail

Contact Name: Shirley P Whelan  
 Contact Telephone Number: (716) 858-8942  
 Library Name (Billed Entity): Buffalo & Erie County Public Library  
 Universal Service Control Nbr: 134830000164784  
 Form 471 Application Number:

## DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Number of Applications for		Total (D+E)	% of Enrollment (F/C)	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I*C)	District Discount (J / C)
Akron Central	Akron Elem School	773	145	63	208	27%	Urban	50%	387	
Akron Central	Akron J S H S	866	97	62	159	18%	Urban	40%	346	
<b>Akron Central</b>	<b>Total District</b>	<b>1,639</b>					<b>Urban</b>		<b>733</b>	<b>45%</b>
Alden Central	Alden Intermediate School	460	65	53	118	26%	Urban	50%	230	
Alden Central	Alden Middle School	528	64	50	114	22%	Urban	50%	264	
Alden Central	Alden Primary Sch @ Tow	463	70	50	120	26%	Urban	50%	232	
Alden Central	Alden S H S	661	70	51	121	18%	Urban	40%	264	
<b>Alden Central</b>	<b>Total District</b>	<b>2,112</b>					<b>Urban</b>		<b>990</b>	<b>47%</b>
Amherst Central	Amherst Middle School	787	84	30	114	14%	Urban	40%	315	
Amherst Central	Amherst Sr. High Sch	968	75	40	115	12%	Urban	40%	387	
Amherst Central	Smallwood Elem Sch	721	41	23	64	9%	Urban	40%	288	
Amherst Central	Windermere Elem Sch	712	203	57	260	37%	Urban	60%	427	
<b>Amherst Central</b>	<b>Total District</b>	<b>3,188</b>					<b>Urban</b>		<b>1,418</b>	<b>44%</b>
Buffalo City School District	Science Magnet	720	478	114	592	82%	Urban	90%	648	
Buffalo City School District	P S 3	604	470	44	514	85%	Urban	90%	544	
Buffalo City School District	P S 4	570	532	31	563	99%	Urban	90%	513	
Buffalo City School District	Campus West	950	569	131	700	74%	Urban	80%	760	
Buffalo City School District	P S 6	822	665	86	751	91%	Urban	90%	740	
Buffalo City School District	Stanley Makowski Center	1,070	838	130	968	90%	Urban	90%	963	
Buffalo City School District	P S 8	785	591	85	676	86%	Urban	90%	707	
Buffalo City School District	Adult Learning Center	60	60	0	60	100%	Urban	90%	54	
Buffalo City School District	Parent Center	110	97	9	106	96%	Urban	90%	99	
Buffalo City School District	P S 11	642	542	31	573	89%	Urban	90%	578	
Buffalo City School District	P S 12	314	240	44	284	90%	Urban	90%	283	
Buffalo City School District	P S 17	850	668	52	720	85%	Urban	90%	765	
Buffalo City School District	P S 18	680	611	39	650	96%	Urban	90%	612	
Buffalo City School District	P S 19	610	529	48	577	95%	Urban	90%	549	
Buffalo City School District	#18 Annex	118	110	5	115	97%	Urban	90%	106	
Buffalo City School District	King Urban Life Center	87	72	8	80	92%	Urban	90%	78	
Buffalo City School District	St. Lawrence	160	133	13	146	91%	Urban	90%	144	
Buffalo City School District	P S 27	376	281	39	320	85%	Urban	90%	338	

### Library Discount Rate Calculation Detail

**Contact Name:** Shirley P Whelan  
**Contact Telephone Number:** (716) 858-8942  
**Library Name (Billed Entity):** Buffalo & Erie County Public Library  
**Universal Service Control Nbr:** 134830000164784  
**Form 471 Application Number:**

### DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Number of Applications for		Total (D+E)	% of Enrollment (F/G)	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I*J)	District Discount (J / C)
Buffalo City School District	P S 28	419	346	47	393	94%	Urban	90%	377	
Buffalo City School District	P S 31	310	215	23	238	77%	Urban	90%	279	
Buffalo City School District	#32 Montessori School	560	225	75	300	54%	Urban	80%	448	
Buffalo City School District	P S 33	479	432	32	464	97%	Urban	90%	431	
Buffalo City School District	#35 Bflo. Alternative H S	179	128	6	134	75%	Urban	90%	161	
Buffalo City School District	P S 36	330	300	20	320	97%	Urban	90%	297	
Buffalo City School District	#37 Futures Academy	749	562	91	653	87%	Urban	90%	674	
Buffalo City School District	P S 38	640	501	42	543	85%	Urban	90%	576	
Buffalo City School District	#39 Dr. M L King Jr. High	929	660	90	750	81%	Urban	90%	836	
Buffalo City School District	P S 40	319	251	34	285	89%	Urban	90%	287	
Buffalo City School District	P S 43	564	424	70	494	88%	Urban	90%	508	
Buffalo City School District	P S 44	618	568	22	590	95%	Urban	90%	556	
Buffalo City School District	P S 45	1,114	958	105	1,063	95%	Urban	90%	1,003	
Buffalo City School District	P S 51	460	390	34	424	92%	Urban	90%	414	
Buffalo City School District	P S 53	525	475	32	507	97%	Urban	90%	473	
Buffalo City School District	P S 54	616	334	64	398	65%	Urban	80%	493	
Buffalo City School District	P S 56	470	137	43	180	38%	Urban	60%	282	
Buffalo City School District	P S 57	385	371	11	382	99%	Urban	90%	347	
Buffalo City School District	P S 59	826	629	165	794	96%	Urban	90%	743	
Buffalo City School District	P S 60	569	448	66	514	90%	Urban	90%	512	
Buffalo City School District	P S 61	590	496	60	556	94%	Urban	90%	531	
Buffalo City School District	#63 Campus North	633	437	75	512	81%	Urban	90%	570	
Buffalo City School District	P S 64	564	195	40	235	42%	Urban	60%	338	
Buffalo City School District	P S 65	419	340	52	392	94%	Urban	90%	377	
Buffalo City School District	P S 66	387	222	52	274	71%	Urban	80%	310	
Buffalo City School District	P S 67	368	140	50	190	52%	Urban	80%	294	
Buffalo City School District	P S 68	558	443	68	511	92%	Urban	90%	502	
Buffalo City School District	P S 69	405	292	58	350	86%	Urban	90%	365	
Buffalo City School District	P S 70	258	178	43	221	86%	Urban	90%	232	
Buffalo City School District	P S 71	730	562	70	632	87%	Urban	90%	657	
Buffalo City School District	P S 72	493	345	62	407	83%	Urban	90%	444	
Buffalo City School District	P S 74	541	433	37	470	87%	Urban	90%	487	
Buffalo City School District	#76 Herman Badillo Sch	495	453	34	487	98%	Urban	90%	446	

## Library Discount Rate Calculation Detail

Contact Name: Shirley P Whelan  
 Contact Telephone Number: (716) 858-8942  
 Library Name (Billed Entity): Buffalo & Erie County Public Library  
 Universal Service Control Nbr: 134830000164784  
 Form 471 Application Number:

## DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Number of Applications for Free Lunch	Reduced Lunch	Total (D+E)	% of Enrollmen (F/C)	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I*C)	District Discount (J / C)
Buffalo City School District	P S 77	544	527	9	536	99%	Urban	90%	490	
Buffalo City School District	P S 78	552	406	69	475	86%	Urban	90%	497	
Buffalo City School District	P S 80	672	509	69	578	86%	Urban	90%	605	
Buffalo City School District	P S 81	780	380	113	493	63%	Urban	80%	624	
Buffalo City School District	P S 82	670	581	34	615	92%	Urban	90%	603	
Buffalo City School District	P S 86	271	157	27	184	68%	Urban	80%	217	
Buffalo City School District	P S 90	552	431	24	455	82%	Urban	90%	497	
Buffalo City School District	#89 Campus East	610	350	122	472	77%	Urban	90%	549	
Buffalo City School District	#91 Build Academy	785	535	125	660	84%	Urban	90%	707	
Buffalo City School District	#192 Buffalo Traditional	881	481	144	625	71%	Urban	80%	705	
Buffalo City School District	Acad Visual/Perfm. Arts	807	280	117	397	49%	Urban	60%	484	
Buffalo City School District	McKinley Vocational H S	1,207	573	164	737	61%	Urban	80%	966	
Buffalo City School District	Bennett H S	1,000	455	77	532	53%	Urban	80%	800	
Buffalo City School District	Burgard Vocational H S	520	306	62	368	71%	Urban	80%	416	
Buffalo City School District	#195 City Honors	840	142	75	217	26%	Urban	50%	420	
Buffalo City School District	Grover Cleveland H S	700	548	36	584	83%	Urban	90%	630	
Buffalo City School District	Emerson Ctl Tech. H S	628	410	56	466	74%	Urban	80%	502	
Buffalo City School District	Hutchinson Ctl Tech H S	1,180	376	188	564	48%	Urban	60%	708	
Buffalo City School District	Kensington H S	900	368	41	409	45%	Urban	60%	540	
Buffalo City School District	Lafayette H S	770	456	75	531	69%	Urban	80%	616	
Buffalo City School District	Riverside H S	740	441	100	541	73%	Urban	80%	592	
Buffalo City School District	Seneca Vocational H S	800	531	111	642	80%	Urban	90%	720	
Buffalo City School District	South Park H S	1,300	623	86	709	55%	Urban	80%	1,040	
Buffalo City School District	Southside Elementary	1,207	877	168	1,045	87%	Urban	90%	1,086	
Buffalo City School District	West Hertel Middle Sch	955	775	87	862	90%	Urban	90%	860	
Buffalo City School District	Waterfront Elem	914	559	126	685	75%	Urban	90%	823	
Buffalo City School District	OTC	44	30	5	35	80%	Urban	90%	40	
Buffalo City School District	P S #111 Poplar Academy	374	350	21	371	99%	Urban	90%	337	
Buffalo City School District	Leonardo Da Vinci	302	143	36	179	59%	Urban	80%	242	
Buffalo City School District	P S #57 Broadway Vill An	232	211	11	222	96%	Urban	90%	209	
Buffalo City School District	<b>Total District</b>	<b>48,767</b>					<b>Urban</b>		<b>41,250</b>	<b>85%</b>

### Library Discount Rate Calculation Detail

**Contact Name:** Shirley P Whelan  
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**Form 471 Application Number:**

### DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Number of Applications for		Total	% of Enrollment	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I*C)	District Discount (J / C)
			Free Lunch	Reduced Lunch	(D+E)	(F/C)				
Cheektowaga Central	Pine Hill Primary Ctr	369	97	30	127	34%	Urban	50%	185	
Cheektowaga Central	Union East Elem School	962	222	70	292	30%	Urban	50%	481	
Cheektowaga Central	Cheektowaga J S H S	1,165	174	70	244	21%	Urban	50%	583	
<b>Cheektowaga Central</b>	<b>Total District</b>	<b>2,496</b>					<b>Urban</b>		<b>1,248</b>	<b>50%</b>
Cheektowaga Maryvale UFSD	Robert Binner	27	5	4	9	33%	Urban	50%	14	
Cheektowaga Maryvale UFSD	Maryvale Primary Sch	622	111	66	177	28%	Urban	50%	311	
Cheektowaga Maryvale UFSD	Maryvale Middle Sch	567	93	71	164	29%	Urban	50%	284	
Cheektowaga Maryvale UFSD	Senior High 1	770	67	50	117	15%	Urban	40%	308	
Cheektowaga Maryvale UFSD	Senior High 2	36	16	2	18	50%	Urban	80%	29	
Cheektowaga Maryvale UFSD	Maryvale Intermed Sch	588	117	74	191	32%	Urban	50%	294	
<b>Cheektowaga Maryvale UFSD</b>	<b>Total District</b>	<b>2,610</b>					<b>Urban</b>		<b>1,225</b>	<b>47%</b>
Cheektowaga Sloan UFSD	Theodore Roosevelt Sch	426	121	46	167	39%	Urban	60%	256	
Cheektowaga Sloan UFSD	Woodrow Wilson Elem	335	109	51	160	48%	Urban	60%	201	
Cheektowaga Sloan UFSD	John F. Kennedy H S	743	130	131	261	35%	Urban	60%	446	
<b>Cheektowaga Sloan UFSD</b>	<b>Total District</b>	<b>1,504</b>					<b>Urban</b>		<b>902</b>	<b>60%</b>
Clarence Central	Sheridan Elem School	381	9	6	15	4%	Urban	40%	152	
Clarence Central	Harris Hill Elem School	341	13	14	27	8%	Urban	40%	136	
Clarence Central	Ledgeview Elem School	583	33	18	51	9%	Urban	40%	233	
Clarence Central	Clarence S H S	1,250	32	27	59	5%	Urban	40%	500	
Clarence Central	Clarence Ctr Elem Sch	657	13	19	32	5%	Urban	40%	263	
Clarence Central	Clarence Middle School	971	42	26	68	7%	Urban	40%	388	
<b>Clarence Central</b>	<b>Total District</b>	<b>4,183</b>					<b>Urban</b>		<b>1,673</b>	<b>40%</b>
East Aurora Union Free	Parkdale Elem School	437	12	4	16	4%	Urban	40%	175	
East Aurora Union Free	Main St. Elem School	990	47	17	64	6%	Urban	40%	396	
East Aurora Union Free	East Aurora S H S	599	23	10	33	6%	Urban	40%	240	
East Aurora Union Free	Ormsby Center	77	28	7	35	45%	Urban	60%	46	
<b>East Aurora Union Free</b>	<b>Total District</b>	<b>2,103</b>					<b>Urban</b>		<b>857</b>	<b>41%</b>

### Library Discount Rate Calculation Detail

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**Library Name (Billed Entity):** Buffalo & Erie County Public Library  
**Universal Service Control Nbr:** 134830000164784  
**Form 471 Application Number:**

### DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Number of Applications for Free Lunch	Reduced Lunch	Total (D+E)	% of Enrollment (F/C)	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I*C)	District Discount (J / C)
Eden Central	Eden Jr Sr High School	836	66	25	91	11%	Urban	40%	334	
Eden Central	G L Preiss Elem School	436	58	23	81	19%	Urban	40%	174	
Eden Central	Eden Elementary School	611	60	32	92	15%	Urban	40%	244	
<b>Eden Central</b>	<b>Total District</b>	<b>1,883</b>					<b>Urban</b>		<b>753</b>	<b>40%</b>
Evans-Brant CSD (Lakeshore)	Highland Elem School	491	81	27	108	22%	Urban	50%	246	
Evans-Brant CSD (Lakeshore)	William Hoag Elem Sch	354	96	38	134	38%	Urban	60%	212	
Evans-Brant CSD (Lakeshore)	Lake Shore S H S	787	175	94	269	35%	Urban	60%	460	
Evans-Brant CSD (Lakeshore)	John T Waugh J H S	587	178	74	252	43%	Urban	60%	352	
Evans-Brant CSD (Lakeshore)	Brant Elem School	109	27	16	43	39%	Urban	60%	65	
Evans-Brant CSD (Lakeshore)	A J. Schmidt Elem Sch	413	128	34	162	39%	Urban	60%	248	
Evans-Brant CSD (Lakeshore)	Lake Shore Cent Mdl Sch	912	214	97	311	34%	Urban	50%	456	
<b>Evans-Brant CSD (Lakeshore)</b>	<b>Total District</b>	<b>3,633</b>					<b>Urban</b>		<b>2,040</b>	<b>56%</b>
Frontier Central	Big Tree Elem School	611	85	65	150	25%	Urban	50%	306	
Frontier Central	Blasdell Elem	630	171	102	273	43%	Urban	60%	378	
Frontier Central	Cloverbank	708	102	69	171	24%	Urban	50%	354	
Frontier Central	Pinehurst	657	41	63	104	16%	Urban	40%	263	
Frontier Central	Frontier Middle School	1,342	197	149	346	26%	Urban	50%	671	
Frontier Central	Frontier High	1,671	145	139	284	17%	Urban	40%	668	
<b>Frontier Central</b>	<b>Total District</b>	<b>5,619</b>					<b>Urban</b>		<b>2,640</b>	<b>47%</b>
Gowanda Central (Erie County)	Aldrich Street School	304	148	27	173	57%	Urban	80%	243	
Gowanda Central (Cattaraugus Cnty)	Gowanda Elem School	468	198	50	246	53%	Rural	80%	374	
Gowanda Central (Cattaraugus Cnty)	Gowanda High School	698	215	58	271	39%	Rural	70%	489	
<b>Gowanda Central *</b>	<b>Total District</b>	<b>1,470</b>					<b>Urb/Rur</b>		<b>1,106</b>	<b>75%</b>
Grand Island Central	Huth Road School	544	36	22	58	11%	Urban	40%	218	
Grand Island Central	Kaegebein School	424	34	49	83	20%	Urban	50%	212	
Grand Island Central	Grand Island S H S	926	31	38	69	7%	Urban	40%	370	
Grand Island Central	Grand Island Middle Sch	821	36	47	83	10%	Urban	40%	328	
Grand Island Central	Sidway Elem School	483	32	23	55	11%	Urban	40%	193	
<b>Grand Island Central</b>	<b>Total District</b>	<b>3,198</b>					<b>Urban</b>		<b>1,322</b>	<b>41%</b>

## Library Discount Rate Calculation Detail

**Contact Name:** Shirley P Whelan  
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**Library Name (Billed Entity):** Buffalo & Erie County Public Library  
**Universal Service Control Nbr:** 134830000164784  
**Form 471 Application Number:**

## DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Number of Applications for		Total (D+E)	% of Enrollment (F/C)	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I*C)	District Discount (J / C)
Hamburg Central	Armor Elem School	478	50	49	99	21%	Urban	50%	239	
Hamburg Central	Boston Valley Elem Sch	298	36	24	60	20%	Urban	50%	149	
Hamburg Central	Charlotte Ave Elem Sch	373	45	24	69	18%	Urban	40%	149	
Hamburg Central	Union Pleasant Elem	764	100	43	143	19%	Urban	40%	306	
Hamburg Central	Hamburg Middle School	986	76	53	129	13%	Urban	40%	394	
Hamburg Central	Hamburg H S	1,366	62	65	127	9%	Urban	40%	546	
<b>Hamburg Central</b>	<b>Total District</b>	<b>4,265</b>					<b>Urban</b>		<b>1,784</b>	<b>42%</b>
Iroquois Central	Elma Primary School	329	23	12	35	11%	Urban	40%	132	
Iroquois Central	Iroquois Intermediate	454	36	23	59	13%	Urban	40%	182	
Iroquois Central	Marilla Primary School	240	21	14	35	15%	Urban	40%	96	
Iroquois Central	Wales Primary School	292	27	14	41	14%	Urban	40%	117	
Iroquois Central	Middle School	717	33	21	54	8%	Urban	40%	287	
Iroquois Central	High School	891	33	34	67	8%	Urban	40%	356	
<b>Iroquois Central</b>	<b>Total District</b>	<b>2,923</b>					<b>Urban</b>		<b>1,169</b>	<b>40%</b>
Kenmore-Town of Tonawanda UFSD	Brighton Language Dev C	150	74	17	91	61%	Urban	80%	120	
Kenmore-Town of Tonawanda UFSD	Alex. Hamilton Elem Sch	441	64	25	89	20%	Urban	50%	221	
Kenmore-Town of Tonawanda UFSD	Franklin Elem/Middle	1,295	207	148	355	27%	Urban	50%	648	
Kenmore-Town of Tonawanda UFSD	C A Lindbergh Elem Sch	555	47	24	71	13%	Urban	40%	222	
Kenmore-Town of Tonawanda UFSD	Hoover Elem/Middle	1,349	218	114	332	25%	Urban	50%	675	
Kenmore-Town of Tonawanda UFSD	Holmes Elem School	443	236	42	278	63%	Urban	80%	354	
Kenmore-Town of Tonawanda UFSD	Theo. Roosevelt Elem Sc	481	120	72	192	40%	Urban	60%	289	
Kenmore-Town of Tonawanda UFSD	Thomas Edison Elem Sch	537	57	42	99	18%	Urban	40%	215	
Kenmore-Town of Tonawanda UFSD	Jefferson Elem School	345	33	17	50	14%	Urban	40%	138	
Kenmore-Town of Tonawanda UFSD	Kenmore Middle School	753	99	90	189	25%	Urban	50%	377	
Kenmore-Town of Tonawanda UFSD	Kenmore East H S	1,223	91	63	154	13%	Urban	40%	489	
Kenmore-Town of Tonawanda UFSD	Kenmore West H S	1,657	179	120	299	18%	Urban	40%	663	
<b>Kenmore-Town of Tonawanda SD</b>	<b>Total District</b>	<b>9,229</b>					<b>Urban</b>		<b>4,409</b>	<b>48%</b>

## Library Discount Rate Calculation Detail

**Contact Name:** Shirley P Whelan  
**Contact Telephone Number:** (716) 858-8942  
**Library Name (Billed Entity):** Buffalo & Erie County Public Library  
**Universal Service Control Nbr:** 134830000164784  
**Form 471 Application Number:**

## DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Free Lunch	Reduced Lunch	Total (D+E)	% of Enrollment (F/C)	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I*C)	District Discount (J / C)
Lackawanna City SD	McKinley Elem School	365	257	53	310	85%	Urban	90%	329	
Lackawanna City SD	Lackawanna H S	1,066	642	138	780	73%	Urban	80%	853	
Lackawanna City SD	Franklin PreK	119	58	24	82	69%	Urban	80%	95	
Lackawanna City SD	Truman Elem School	569	387	94	481	85%	Urban	90%	512	
Lackawanna City SD	Washington Elementary	189	139	15	154	81%	Urban	90%	170	
Lackawanna City SD	<b>Total District</b>	<b>2,308</b>					<b>Urban</b>		<b>1,959</b>	<b>85%</b>
Lancaster Central	Sciole Elem School	474	61	47	108	23%	Urban	50%	237	
Lancaster Central	Central Ave. Elem	272	42	27	69	25%	Urban	50%	136	
Lancaster Central	William Street School	916	91	92	183	20%	Urban	50%	458	
Lancaster Central	Como Park Elem School	459	23	40	63	14%	Urban	40%	184	
Lancaster Central	Court St. Elem School	396	43	24	67	17%	Urban	40%	158	
Lancaster Central	Hillview Elem School	504	60	38	98	19%	Urban	40%	202	
Lancaster Central	Aurora Middle School	855	90	68	158	18%	Urban	40%	342	
Lancaster Central	Lancaster H S	1,699	116	120	236	14%	Urban	40%	680	
Lancaster Central	<b>Total District</b>	<b>5,575</b>					<b>Urban</b>		<b>2,396</b>	<b>43%</b>
North Collins CSD	North Collins J S H S	345	50	35	85	25%	Urban	50%	173	
North Collins CSD	North Collins Elem Sch	435	102	58	158	36%	Urban	60%	261	
North Collins CSD	<b>Total District</b>	<b>780</b>					<b>Urban</b>		<b>434</b>	<b>56%</b>
Orchard Park CSD	Windom Elem School	664	77	26	103	16%	Urban	40%	266	
Orchard Park CSD	Eggert Elem School	628	44	14	58	9%	Urban	40%	251	
Orchard Park CSD	Ellicott Rd Elem School	752	16	16	32	4%	Urban	40%	301	
Orchard Park CSD	South Davis Elem Sch	406	5	2	7	2%	Urban	40%	162	
Orchard Park CSD	Middle School	1,237	49	28	77	6%	Urban	40%	495	
Orchard Park CSD	Baker Building	70	16	5	21	30%	Urban	50%	35	
Orchard Park CSD	Orchard Park S H S	1,645	29	14	43	3%	Urban	40%	658	
Orchard Park CSD	<b>Total District</b>	<b>5,402</b>					<b>Urban</b>		<b>2,168</b>	<b>40%</b>
Springville-Griffith Inst. CSD	Griffith Institute H S	777	67	34	101	13%	Urban	40%	311	
Springville-Griffith Inst. CSD	Boston-Colden Elem	240	32	14	46	19%	Urban	40%	96	
Springville-Griffith Inst. CSD	Springville Elem School	847	147	83	230	27%	Urban	50%	424	
Springville-Griffith Inst. CSD	Springville Middle Sch	632	85	53	138	22%	Urban	50%	316	
Springville-Griffith Inst. CSD	<b>Total District</b>	<b>2,496</b>					<b>Urban</b>		<b>1,146</b>	<b>46%</b>

## Library Discount Rate Calculation Detail

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**Form 471 Application Number:**

## DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Number of Applications for		Total (D+E)	% of Enrollment (F/C)	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I* C)	District Discount (J / C)
			Free Lunch	Reduced Lunch						
Sweet Home Central	Glendale Elem	490	101	29	130	27%	Urban	50%	245	
Sweet Home Central	Maplemere Elem	488	53	43	96	20%	Urban	50%	244	
Sweet Home Central	Sweet Home Middle Sch	908	143	49	192	21%	Urban	50%	454	
Sweet Home Central	Sweet Home Senior High	1,228	113	66	179	15%	Urban	40%	491	
Sweet Home Central	Willow Ridge Elem	492	60	32	92	19%	Urban	40%	197	
Sweet Home Central	Heritage Heights Elem	367	93	47	140	38%	Urban	60%	220	
Sweet Home Central	BOCES Ctr/Dexter Terr Bldg	160	51	25	76	48%	Urban	60%	96	
<b>Sweet Home Central</b>	<b>Total District</b>	<b>4,133</b>					<b>Urban</b>		<b>1,947</b>	<b>47%</b>
Tonawanda City Schools	Fletcher Elem School	320	111	32	143	45%	Urban	60%	192	
Tonawanda City Schools	Highland Elem School	259	52	19	71	27%	Urban	50%	130	
Tonawanda City Schools	Mullen Elem School	275	59	21	80	29%	Urban	50%	138	
Tonawanda City Schools	Riverview Elem School	318	73	40	113	36%	Urban	60%	191	
Tonawanda City Schools	Tonawanda Jr/Sr High	1,221	153	78	231	19%	Urban	40%	488	
<b>Tonawanda City Schools</b>	<b>Total District</b>	<b>2,393</b>					<b>Urban</b>		<b>1,138</b>	<b>48%</b>
West Seneca Central	Potters Road School	634	89	65	154	24%	Urban	50%	317	
West Seneca Central	Alternative Learning Ctr.	41	14	3	17	41%	Urban	60%	25	
West Seneca Central	Allendale School	551	79	38	117	21%	Urban	50%	276	
West Seneca Central	East MS & Elementary	1,223	112	68	180	15%	Urban	40%	489	
West Seneca Central	OSP South (Potter OCC)	80	8	3	11	14%	Urban	40%	32	
West Seneca Central	Winchester School	485	132	70	202	42%	Urban	60%	291	
West Seneca Central	West Seneca S H S	1,382	141	71	212	15%	Urban	40%	553	
West Seneca Central	West M S	665	77	58	135	20%	Urban	50%	333	
West Seneca Central	Clinton Street School	597	96	34	130	22%	Urban	50%	299	
West Seneca Central	West Seneca East Sr. H	1,164	69	49	118	10%	Urban	40%	466	
West Seneca Central	Northwood Elem School	617	111	70	181	29%	Urban	50%	309	
West Seneca Central	W. Seneca Educa. Ctr.	443	101	22	123	28%	Urban	50%	222	
<b>West Seneca Central</b>	<b>Total District</b>	<b>7,882</b>					<b>Urban</b>		<b>3,609</b>	<b>46%</b>

## Library Discount Rate Calculation Detail

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## DISCOUNT RATES by SCHOOL and DISTRICT

Data Source: New York State Education Department Child Nutrition Reimbursement Unit, "Comparison of Free/Reduced Price Lunch Applications to Enrollment", 10/98

A	B	C	D	E	F	G	H	I	J	K
District Name	School Name	Total Enrollment	Number of Applications for		Total (D+E)	% of Enrollment (F/C)	Urban/Rural	Discount (Frm SLC Matrix)	Rate X # of Students (I*C)	District Discount (J / C)
Williamsville Central	Mill Middle School	787	45	30	75	10%	Urban	40%	315	
Williamsville Central	Dodge Elem School	632	51	10	61	10%	Urban	40%	253	
Williamsville Central	Maple East Elem Sch	657	15	3	18	3%	Urban	40%	263	
Williamsville Central	Williamsville South S H S	999	35	17	52	5%	Urban	40%	400	
Williamsville Central	Heim Elem School	702	36	24	60	9%	Urban	40%	281	
Williamsville Central	Forest Elem School	569	29	21	50	9%	Urban	40%	228	
Williamsville Central	Maple West Elem School	582	23	9	32	5%	Urban	40%	233	
Williamsville Central	Heim Middle School	796	52	27	79	10%	Urban	40%	318	
Williamsville Central	Williamsville North S H S	1,257	69	25	94	7%	Urban	40%	503	
Williamsville Central	Country Pkwy. Elem Sch	803	11	29	40	5%	Urban	40%	321	
Williamsville Central	Casey Middle School	680	52	14	66	10%	Urban	40%	272	
Williamsville Central	Williamsville East S H S	1,054	20	12	32	3%	Urban	40%	422	
Williamsville Central	Transit Middle School	1,077	28	14	42	4%	Urban	40%	431	
<b>Williamsville Central</b>	<b>Total District</b>	<b>10,595</b>					<b>Urban</b>		<b>4,238</b>	<b>40%</b>

\* The Gowanda Central School District serves portions of Erie County which is classified as "Urban" for discount calculation purposes and portions of Cattaraugus County which is classified as "Rural" for discount calculation purposes. The Gowanda Free Library, located in the Village of Gowanda in Cattaraugus County, receives telecommunications services only and does not receive system generated technology or online access to electronic information. The Collins Public Library, located in the Town of Collins in Erie County is also served by the Gowanda Central School District. The Collins Public Library receives both telecommunications services and system generated technology and online access to electronic information.

Contact Name

Shirley P. Whelan

Contact Telephone Number

716/858-8942

**Schools and Libraries Universal Service Program  
Form 471 Pre-Discount Cost Calculation Optional Grid**

Please read instructions before completing

(To be completed by Schools, Libraries, or Consortia)

Block A: General Information	
1. Name of Applicant <b>Buffalo &amp; Erie County Public Library</b>	2. Universal Service Control Number (from 470 Application) <b>134830000164784</b>
3a. SLC Service Provider Number (SPIN) if known, and Full Legal Name of your Service Provider <b>1430007962 IKON Business Systems</b>	3b. Contract or Tariff Number (If Applicable - from Item 15-16) <b>PT00313</b>
4. Shared Services: Telecommunications Services <input type="checkbox"/> Internal Connections <input type="checkbox"/> Internet Access <input type="checkbox"/>	Site Specific Services: Internal Connections <input checked="" type="checkbox"/> Dedicated Services <input type="checkbox"/>
5. Average Discount Rate for Entities Receiving Services Listed Below in Block B (Per Column 11 of Items 15 or 16) <b>61%</b>	

Block B: Services Ordered Information													
6. Services & Products Ordered Details													
1	2	3	4	5	6	7	8	9	10	11	12	13	14
Account Information	Service Description	Quantity	One-Time Charges	One-Time Taxes and Surcharges	Unit Monthly Charges	Unit Monthly Taxes and Surcharges	Number of Months	Annual Amount of Monthly Charges	% Eligible Services and/or % Eligible Uses	% of Service/Product Used w/ Eligible Entities	Estimated Eligible Pre-Discount One-Time Charges	Total Annual Amount of Estimated Eligible Pre-Discount Monthly Charges	Estimated Eligible Pre-Discount Total Charges
a. LRN #7399047	Purchase Cisco 2501 router software maintenance for Y2K	17	4,207.50	-	-	-	12	-	100%	100%	4,207.50	-	4,207.50
a. LRN #7399047	Purchase and install Cisco 2501 router Flash memory upgrades (required for Y2K software upgrade)	16	4,160.00	-	-	-	12	-	100%	100%	4,160.00	-	4,160.00
c.			-	-	-	-	-	-	100%	100%	-	-	-
d.			-	-	-	-	-	-	100%	100%	-	-	-
e.			-	-	-	-	-	-	100%	100%	-	-	-
f.			-	-	-	-	-	-	100%	100%	-	-	-
g.			-	-	-	-	-	-	100%	100%	-	-	-
<b>7. Total</b>			<b>8,367.50</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>		<b>0.00</b>			<b>8,367.50</b>	<b>-</b>	<b>8,367.50</b>

Attach this grid to your Form 471 application to support Block 5, Items 15 & 16 Columns 8-10 and Item 17.