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School District of Grand Island

Administration Building

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MAR 14 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 6, 2001

To Whom It May Concern:

I am writing regarding Year 3 Universal Service Funding requests, specifically application #172421. Please note our district information below. I am responding to "Administrator's Decision on Appeal - Funding Year 2000-2001" dated February 14, 2001.

Applicant Name: Grand Island Public Schools
 Application Number: 172421
 Billed Entity Number: 138718
 FRN: 372002
 Reason for Letter: Appeal

I am also directing this letter to the Federal Communications Commission citing CC Docket Nos. 96-45 and 97-21.

On February 14, 2001, a letter was mailed to the School District of Grand Island indicating that our Universal Service Funding request for reimbursement of frame relay charges and router maintenance charges was denied in full. I am writing to appeal this decision.

The charges listed on the application include:

- | | |
|------------------------------------------------------------------------------------------------|-------------|
| • Annual pre-discount amount for eligible recurring charges*
*T-1 and 56K data line charges | \$33,829.56 |
| • Annual pre-discount amount for eligible one-time charges#
#Router maintenance charges | \$6,300.00 |

After visiting with USF personnel, I understand that listing the router maintenance on this application moved the application from Internet Access to Internal Connections. I understand that due to the large number of funding requests, Internal Connections will not be funded this year. I also understand that according to your guidelines, changes cannot be made to the 471 once it has been filed. I do not consider disregarding the Internal Connections portion of the application to be a change. Page 5 of the Form 471 filing instructions indicates:

As the billed entity for services requested on one or more Forms 470, you may combine services requested on multiple Forms 470 into one Form 471, or you may file a corresponding Form 471 for each Form 470 filed on your behalf.

Apparently, the current interpretation of SLC guidelines is contrary to my interpretation of the filing instructions. Those of us who chose to be efficient with our time and file both charges on the same form are now being penalized because Internal Connections are not being funded this year.

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Sue Burch
 Director of Instructional Technology

123 South Webb Road
 P. O. Box 4904
 Grand Island, NE 68802-4904

(308) 385-5900 - phone
 (308) 385-5976 - fax
 sburch@esu10.org

In order to provide a broader picture of the Universal Service Fund filing process from the perspective of a large district, I have outlined the tasks and associated time commitments that I have experienced with the Year 3 funding cycle. Thus far, in order to apply for the Year 3 funding cycle, I have done the following.

<u>Task</u>	<u>Date</u>	<u>Estimated Burden Hours</u>
• Posted Form 470 #278040000280219	December, 1999	5 hours
• Posted Form 470 #581030000280125	December, 1999	5 hours
• Posted Form 470 #693430000279846	December, 1999	5 hours
• Posted Form 470 #704030000280065	December, 1999	5 hours
• Posted Form 470 #81874000027997	December, 1999	5 hours
• Posted Form 471 #173092	January, 2000	4 hours
• Posted Form 471 #172702	January, 2000	4 hours
• Posted Form 471 #172568	January, 2000	4 hours
• Posted Form 471 #172421	January, 2000	4 hours
• Posted Form 471 #170713	January, 2000	4 hours
• Faxed note of clarification regarding existence of Walnut Middle School, Alternative Middle School, and Connell Building	April, 2000	1 hour
• Faxed note of clarification regarding Progress School	April, 2000	1 hour
• Faxed note of clarification Alternative Middle School and Lincoln Elementary	April, 2000	1 hour
• Faxed note of clarification for Form 471 #170713	May, 2000	1 hour
• Faxed note of clarification for Form 471 #172421	May, 2000	1 hour
• Faxed note of clarification for Form 471 #172568	May, 2000	1 hour
• Faxed note of clarification for Form 471 #172702	May, 2000	1 hour
• Faxed letter of appeal for Form 471 #172421	May, 2000	1 hour
• Emailed further clarification for Form 471 #172421	February, 2001	.5 hours
• Fax second letter of appeal for Form 471 #172421	February, 2001	<u>2 hours</u>
		55.5 hours

- At the present time, we have received notification that one of our five funding requests has been accepted. Form 471 #170713 regarding district phone charges was funded for \$22,637.02. The other four applications have been denied in full.
- With an additional 10-12 hours, I could have easily filed the router maintenance portion of Form 471 #172421 on separate Form 470 and 471 applications. Either my time efficiency or the current SLC interpretation is costing my district approximately \$27,690.00.

This is not my first frustrating experience with this process. I can say with great certainty that I am not alone in my frustrations. The entire Universal Service Fund application process from Year 1 forward has been confusing, inconsistent, and extremely labor intensive. At the present time, I have 2 three-ring binders containing my documents from Years 1-4 applications.

Sue Burch
Director of Instructional Technology

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Grand Island, NE 68802-4904

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I strongly suspect that the current manner of administering the Universal Service Funding program is a far cry from what the originators envisioned. Unfortunately, due to the complexity of the application process, many districts within our state are no longer working with the program. The excessive paperwork and immense time commitment may necessitate our district contracting with a service company to complete and monitor our Universal Service Fund applications. Isn't it unfortunate that the high degree of bureaucracy will in fact cost schools money, rather than saving them public monies as intended?

In closing, I would once again ask that you reconsider the status of Form 471 #172421. I believe we have followed the rules as we have known them.

Thank you,



Sue Burch
123 South Webb Road, Box 4904
Grand Island, NE 68802-4904
Phone - 308 385-5900
Fax - 308 385-5976
sburch@esu10.org

cc: Letter of Appeal
Schools and Libraries Division
Box 125 - Correspondence Unit
80 South Jefferson Road
Whippany, NJ 07981

Federal Communications Commission
Office of the Secretary
445 - 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Julie Brooker
Senator Chuck Hagel's Office
4009 Sixth Avenue
Kearney, NE 68845

Bruce Reiker
Senator Tom Osborne's Office
819 North Diers
Suite 3
Grand Island, NE 68803

Alan Wibbels, Media/Technology Director
ESU #10
Box 850
Kearney, NE 68848

Sue Burch
Director of Instructional Technology

123 South Webb Road
P. O. Box 4904
Grand Island, NE 68802-4904

(308) 385-5900 - phone
(308) 385-5976 - fax
sburch@esu10.org

Dr. Steve Joel, Superintendent
School District of Grand Island
Box 4904
Grand Island, NE 68802-4904

Mr. Virgil Harden, Director of Business
School District of Grand Island
Box 4904
Grand Island, NE 68802-4904

123 South Webb Road
P. O. Box 4904
Grand Island, NE 68802-4904

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Director of Instructional Technology

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