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MAR 16 2001

FCC MAIL ROOM

March 13, 2001

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

Dear Sir:

This appeal is based on CC Docket Nos. 96-45 and 97-21

Billed Entity Number: 4190
471 Application Number: 160387
Funding Request Number: 311071

This is an appeal of the Universal Service Administration Company ("USAC") denial of funding for SLD's Year Three Funding of Internet Access for East Grand School, Danforth, Maine.

The Universal Service Administration Company is in error in their reclassification of TI Internet Access to Internal Connections. The "USAC" states that since some internal connection services are provided: {maintenance of routers and an Internet server} they have reclassified the service an internal connections, and denied it in full.

The Universal Service Administration Company is in error because:

1. Attachment A, on which they placed their reasoning, was included in the 471 filing in error, by the clerk, mailing the forms. "Attachment A" is not part of the current contract for services. This fact has been given the "USAC", but they ignored it in their ruling.
2. Even if "Attachment A" were part of the current contract for services, the ruling would still be in error. "Attachment A" clearly shows "Network Router" and Internet Server" as part of an Installation/Setup Charge, and not part of the cost of "Internet Access". The Form 471, 160387, application requests only the cost of Internet Access, and did not include these items.

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3. The router is a bundled service. A router is not part of the school network, but rather by definition the bridge between that internal network and the internet. Setting up the router is an integral part of servicing "Internet Access." Configuration and maintenance of the Internet Routers is of necessity part of providing Internet Access. This is routinely the responsibility of the Internet Access provider.

4. There is NO "Internet Server" provided East Grand School by USA EdNet as part of this service contract. USA EdNet does provide bundled email and web hosting services, but this is allowed per CC Docket. 96-45.

5. Form 471, 160387, application requests funding for T1 Internet Access, which qualifies for funding. Even if the "USAC" was correct in their assumption that some internal connection services are being provided, they would still be in error to reclassify the entire services as "Internal Connections" and then making a "Denial in Full". T1 Internet Access qualifies fund funding per CC Docket. 96-45 and would constitute the bulk of the provided services.

Sincerely,



William T. Dobbins
Superintendent of Schools

WD/cag

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