NORTHEASTERN IOWA REGIONAL LIBRARY SYSTEM

415 Commercial Street, Waterloo, IA 50701-1385 FAX (319) 233-1964 (319) 233-1200

Administrator -- James Sixta Consultant -- Ken Davenport

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

RECEIVED

APR 1 2 2001

FCC MAIL ROOM

In the matter of: Request for Review by
North Eastern Iowa Regional Library (NEIRLS) e-rate consortia
of Decision of Universal Service Administrator.

Re: FCC Docket Nos. 97-21 and 96-45

The North Eastern Iowa Regional Library (NEIRLS) e-rate consortia acts as the agent for public libraries in thirteen counties in NE Iowa under a Letter of Agency approved by the Board of Trustees giving the NEIRLS e-rate consortia authority to act on behalf of the public library in matters relating to FCC/USAC/SLD e-rate paperwork.

This appeal of decision is based on electronic filling of:

1. Billed Entity Number 132186
   Form 471 Application # 187440
   Funding Request #'s 391865 & 391711

2. Billed Entity Number 132172
   Form 471 Application # 185751
   Funding Request #'s 386412, 386428 & 386433

SLD Denial letter dated March 19, 2001 SLD Denial Letter dated March 13, 2001
Copies of the Administrator's Decision on Appeal - Funding Year 2000 - 2001 (Yr 3 ADL) attached as Exhibits: **1 a & b** and **2 a & b**

Both of these applications were denied for essentially the same reason [Exhibits: **1 a & b** and **2 a & b** (From Yr 3 ADL bottom of page "a" Note I)] "You signed and/or submitted your Form 471 prior to the expiration of the 28-day posting period."
In all other particulars there is no indication that the remainder of the application is not substantially complete.

So the question rests on the requirement that the application meet the 28-day posting period. Our contention is that since:

1. This application was filed electronically &
2. The electronic filing system will not allow for the printing and posting of a Form 471 until the posting period has expired &
3. That the "Block 6: Certification and Signature" electronically filed pages can be obtained only from the SLD web-site.
4. Therefore the electronically posted Block 6 is in and of itself substantial evidence that

No. of Copies rec'd 0
List A B C D E

the posting period requirement has been met

5 Furthermore in printing the Block 6 the actual date and time of printing of the form is printed on the form See Exhibits **3b and 4b** [Note II bottom right of page].

6. Therefore there is clear and compelling evidence of the actual posting and printing of the Block 6 Certification and Signature page and that any error in the entering of the handwritten date is easily discerned and overwhelmed by the evidence produced by the SLDs web site.

The question, as we see it, is whether, in the case of an electronic filing, the more accurate and substantial evidence of the adherence to the 28 day waiting period is the printed evidence of the electronic filing and the safeguards of the SLD electronic system or the human evidence of the handwritten signature and date.

RELIEF SOUGHT: Reinstatement of the Funding Request Numbers: 391865
391711
386412
386428
386433

Exhibits attached:
1 a and b - Administrator's Decision on Appeal letter for Application # 187440 Funding Request #'s 391685 & 391711
2 a and b - Administrator's Decision on Appeal letter for Application # 185751 Funding Request #'s 386412, 386428 & 386433
3 a and b - FCC Form 471/Block 6 for application # 187440
4 a and b - FCC Form 471/Block 6 for application # 185751
5 Original Letter of appeal for Application # 187440
6 Original Letter of appeal for Application # 185751

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

USAC/SLD attn K. Moore
2120 L Street N.W., Suite 600
Washington DC 20037

Thank You
Kenneth M. Davenport - NEIRLS Consultant
- NEIRLS e-rate Consortia lead

Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal - Funding Year 2000-2001

March 19, 2001

Ken Davenport
Iowa State E- Rate Coordinator
Ref: Nashua Public Library
415 Commercial Street
Waterloo, IA 50701-1317

RECEIVED
APR 1 2 2001
FCC MAIL ROOM

Re: Billed Entity Number: 132186
471 Application Number: 187440
Funding Request Number(s): 391685 & 391711
Your Correspondence Dated: June 21, 2000

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of SLD's Year Three Funding Commitment Decision for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 30-day time period for appealing this decision to the Federal Communications Commission ("FCC"). If your letter of appeal included more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Numbers: 391685 & 391711
Decision on Appeal: **Denied in full.**
Explanation:

- Your letter of appeal stated that you disagreed with the FCD letter for its denial on basis of 28-day waiting period. You requested the SLD to reinstate the application as funded.

- Your Form 470 (Application Number: 305380000284634) was posted on 12/21/99. In your Form 470 Receipt Notification Letter, SLD notified you that that the earliest date upon which you could sign and submit your Form 471 was 1/18/2000. You signed your Form 471 1/17/2000 (Line 35). You have not claimed that this Form 471 relates to a different Form 470 other than the Form 470 indicated above. Consequently, SLD denies your appeal because your application did not comply with the competitive bidding requirement that your Form 470 be posted on the website for 28 days prior to your signing and/or submitting your Form 471.

Note I

- You signed and/or submitted your Form 471 prior to the expiration of the 28-day posting period. FCC rules require that except under limited circumstances, all Forms 470 received be

posted on the website for 28 days, and that applicants carefully consider all bids received before selecting a vendor, entering into an agreement or signing a contract, and signing and submitting a Form 471. *See* 47 C.F.R. §§ 54.504, 54.511(a), (c). FCC rules further require that the Administrator send the applicant a confirmation when the Form 470 has been posted, and inform the applicant of the date after which the applicant may sign a contract with the vendor it selects. *See* 47 C.F.R. § 54.504(b)(4). These competitive bidding requirements help ensure that applicants receive the lowest pre-discount price from vendors. *See Federal-State Joint Board on Universal Service,* CC Docket No. 96-45, Order on Reconsideration, 12 FCC Rcd 10095, 10098 ¶ 9 (1997).

If you believe there is a basis for further examination of your application, you may file an appeal with the Federal Communications Commission, Office of the Secretary, 445 12th Street, SW, Room TW-A325, Washington, DC 20554. Please reference CC Docket Nos. 96-45 and 97-21 on the first page of your appeal. Before preparing and submitting your appeal, please be sure to review the FCC rules concerning the filing of an appeal of an Administrator's Decision, which are posted on the website at <www.universalservice.org>. **You must file your appeal with the FCC no later than 30 days from the date on this letter for your appeal to be filed in a timely fashion.**

We thank you for your continued support, patience, and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal - Funding Year 2000-2001

March 13, 2001

Ken Davenport
Hudson Public Library
415 Commercail Street
Waterloo, IA 50701-1317

RECEIVED
APR 12 2001
FCC MAIL ROOM

Re:	Billed Entity Number:	132172
	471 Application Number:	185751
	Funding Request Number(s):	386412, 386428, 386433
	Your Correspondence Dated:	July 5, 2000

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of SLD's Year Three Funding Commitment Decision for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 30-day time period for appealing this decision to the Federal Communications Commission ("FCC"). If your letter of appeal included more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Numbers: 386412, 386428, 386433
Decision on Appeal: **Denied in full**
Explanation:

- In your appeal letter you disagree with the funding decision. Attached was the front page of the Form 470 and the certification and signature page for the Form 471. You contend that the signature page could not be obtained from any source except as a printout from the SLD site and that it was within the allowable Contract period and the 28-day limit. You ask that we reinstate the application as funded.

Note I.

- You signed your Form 471 application prior to the expiration of the 28-day posting period. FCC rules require that except under limited circumstances, all Forms 470 received be posted on the website for 28 days, and that applicants carefully consider all bids received before selecting a vendor, entering into an agreement or signing a contract, and signing and submitting a Form 471. *See* 47 C.F.R. §§ 54.504; 54.511(a), (c). FCC Form 471 Instructions – September 1999, state 'Item (35)

2 b

requires the date of signature of the Form 471 be provided. Please note that for applications requesting new services CANNOT be earlier than any Allowable Contract Date you cited in Item (17) of any Block 5 submitted with this application.'

- You have stated during initial review by the problem resolution team that you signed your Form 471 on 1/14/2000 (Line 35), which is prior to the expiration of the 28-day posting period. Your Form 470 (Application Number: 259830000283124) was posted on 12/19/1999. In your Form 470 Receipt Notification Letter, SLD notified you that that the earliest date upon which you could sign and submit your Form 471 was 1/16/2000. You have not claimed that this Form 471 relates to a different Form 470 other than the Form 470 indicated above. Consequently, SLD denies your appeal because your application did not comply with the competitive bidding requirement that your Form 470 be posted on the website for 28 days prior to your signing and/or submitting your Form 471.

If you believe there is a basis **for** further examination of your application, you may file an appeal with the Federal Communications Commission, Office of the Secretary, 445 12th Street, SW, Room TW-A325, Washington, DC 20554. Please reference CC Docket Nos. 96-45 and 97-21 on the first page of your appeal. Before preparing and submitting your appeal, please be sure to review the FCC rules concerning the filing of an appeal of an Administrator's Decision, which are posted on the website at <www.universalservice.org>. **You must file your appeal with the FCC no later than 30 days from the date on this letter for your appeal to be filed in a timely fashion.**

We thank you for your continued support, patience, and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

HOME CANCEL HELP

3a

FCC Form 471

Services Ordered and Certification Form

SLD

Applicant's Form Identifier: ffpc194-471 **Entity Number: 132186**

Contact Person: Ken Davenport **Phone Number: (319) 233-1200**

Block 6: Certifications and Signature

[redacted]

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. [illegible] 8801(14) and [illegible] 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 school (including, but not limited to) elementary and secondary schools, colleges and universities

[redacted]

[redacted]

a. ☑ an individual technology plan for using the services requested in this application; and/or

b. ☐ higher-level technology plan(s) for using the services requested in this application

c. ☐ no technology plan needed; applying for basic local and long distance telephone service only

[redacted]

a. ☑ technology plan(s) has/have been approved

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

c. ☐ no technology plan needed; applying for basic local and long distance telephone service only

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

a. ☑ technology plan(s) has/have been approved

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

c. ☐ no technology plan needed; applying for basic local and long distance telephone service only

[redacted]

33. I certify that I am authorized to submit this request on behalf of the entity named in Block 1 of this form. I have reviewed this request, and to the best of my knowledge, information, and belief, all the elements of fact contained herein are true.

3b

34. Signature of authorized person 35. Date

36. Printed name of authorized person Ken Davenport

37. Title or position of authorized person Consultant

38. Telephone number of authorized person (319) 233-1200

471 Application Number: 187440

NASHUA PUBLIC LIBRARY

c/o Ken @ 415 Commercial St

Waterloo, IA 50701

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.

Please submit this form to:

SLD - Form 471
P.O. Box 7026
Lawrence, KS 66044-7026
1-888-203-8100

For express delivery services or U.S. Postal Service, Return Receipt Requested, mail this form to:

SLD - Form 471
C/O Ms Smith
3833 Greenway Drive
Lawrence, KS 66046
1-888-203-8100

Note II

HOME CANCEL HELP

4a

FCC Form 471

Services Ordered and Certification Form

Applicant's Form Identifier: scpc074-471 **Entity Number:** 132172

Contact Person: Ken Davenport **Phone Number:** (319) 233-1200

Block 6: Certifications and Signature

[redacted]

a. ☐ schools under the statutory definition of elementary and secondary schools found in the Elementary and Secondary Education Act of 1965, 20 U.S.C. Secs. 880(14) and (15), 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 school (including, but not limited to) elementary and secondary schools, colleges and universities.

[redacted]

[redacted]

a. ☑ an individual technology plan for using the services requested in this application; and/or

b. ☐ higher-level technology plan(s) for using the services requested in this application

c. ☐ no technology plan needed, applying for basic local/distance telephone service only

[redacted]

a. ☑ technology plan(s) has/have been approved.

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

c. ☐ no technology plan needed, applying for basic local and long distance telephone service only

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

4b

33. 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.

34. Signature of authorized person 35. Date

36. Printed name of authorized person **Ken Davenport**

37. Title or position of authorized person **Consultant**

38. Telephone number of authorized person **(319) 233-[illegible]200**

471 Application Number: 185751

HUDSON PUBLIC LIBRARY

c/o Ken @ 415 Commercial St

Waterloo, IA 50701

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.

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If you owe a past due debt to the federal government, the taxpayer identification number (which is 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 disclose 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 requested 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, Section [illegible] 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 [illegible] 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.

Please submit this form to:

SLD - Form 471
P.O. Box 7026
Lawrence, KS 66044-7026
1-888-203-8100

For express delivery services or U.S. Postal Service, Return Receipt Requested, send this form to:

SLD - Form 471
C/O Ms Smith
3833 Greenway Drive
Lawrence, KS 66046
1-888-203-8100

Note II

Post-Commitment Appeal

Letter of Appeal,

Schools and Libraries Division,
Box 125-Correspondence Unit,
100 South Jefferson Road,
Whippany, NJ 07981.

Date: March 26, 2001

SLD letter date: **05/26/2000**

Please keep your letter brief and to the point, and provide documentation to support the appeal.

NEIRLS Appeal # A- ffpc194-1

5

We disagree with a funding decision:

1A. Why we disagree with the FCD Letter.

Denied on basis of 28 day waiting period: (see bottom of this page)

470 posted (filed on-line) 12/21/1999 Allowable Contract Date *01/18/2000* - *Exhibit I*

471 filed on-line *01/18/2000* (see bottom right of page - *Exhibit II*)

Since the signature page could not be obtained from any source except as a print out from the SLD site it was within the allowable Contract period and the 28 day limit. NOTE: This is NOT something over which on-line filers have control. SLD software limits/error message.

Letter could not be "....signed and/or submitted...."

prior to the day on which it was posted/printed.

1B. Outcome requested.

Reinstate the application as *funded*.

2. Contact information. Please list (person who can most readily discuss this appeal with FCD).

A. name, **Ken Davenport**

B. address, **415 Commercial St.**
Waterloo, Iowa 50701-1317

Signed, _____

Ken Davenport - Consultant, Iowa state e-rate coordinator
NorthEast Iowa Regional Library System

C. telephone number, **(319)233-1200**

D. fax number, **(319)233-1964**

E. e-mail address (if available), **davenport@www.neirls.org** [preferred method]

3. Identify FCD Letter you are appealing (from the top of your FCD Letter).

A. applicant name, **Nashua Public Library**

B. the Form 471 application number, **187440**

C. Billed Entity Number, **132186**

D. Funding year, PYIII - **07/01/2000 - 06/30/2001**

4. Particular Funding Request Number(s) that is/are the subject of appeal.
FR#(s) **391685 & 391711**

NOTE: Explain your appeal to the SLD. When explaining your appeal, include the precise language or text from the Funding Commitment Decisions Letter that is at the heart of your appeal. By pointing FCD to the exact words that give rise to your appeal, the SLD will be able to more readily understand and respond appropriately to your appeal.

Funding Commitment Decision: $0.00 - 28 Day Waiting Period Violated

Funding Commitment Decision Explanation: The Form 471 application was signed and/or submitted prior to the expiration of the 28 day waiting period from the day of the posting of the Form 470 to the SLD Web Site.

Post-Commitment Appeal

Letter of Appeal,

Schools and Libraries Division,
Box 125-Correspondence Unit,
100 South Jefferson Road,
Whippany, NJ 07981.

Date: March 26, 2001

SLD letter date: June 30, 2000

Please keep your letter brief and to the point, and provide documentation to support the appeal.

NEIRLS Appeal # A-070500-1
NEIRLS Form ID # scpc074

6

We disagree with a funding decision:

1A. Why we disagree with the FCD Letter.

Denied on basis of 28 day waiting period: (see bottom of this page)

470 posted (filed on -line) 12/19/1999 Allowable Contract Date 01/16/2000 - Exhibit I

471 filed on-line 01/17/2000 (see bottom right of page - Exhibit II)

Since the signature page could not be obtained from any source except as a print out from the SLD site it was withing the allowable Contract period and the 28 day limit. NOTE: This is NOT something over which on-line filers have control. SLD software limits/error message.

Letter could not be "....signed and/or submitted...."
prior to the day on which it was posted/printed.

1B. Outcome requested.

Reinstate the application as *funded*.

2. Contact information. Please list (person who can most readily discuss this appeal with FCD).

A. name, **Ken Davenport**
B. address, **415 Commercial St.**
Waterloo, Iowa 50701-1317

Signed, _____

Ken Davenport - Consultant, Iowa state e-rate coordinator
NorthEast Iowa Regional Library System

C. telephone number, **(319)233-1200**
D. fax number, **(319)233-1964**
E. e-mail address (if available), **davenport@www.neirls.org** [preferred method]

3. Identify FCD Letter you are appealing (from the top of your FCD Letter).

A. applicant name, **Hudson Public Library**

B. the Form 471 application number, **185751**

C. Billed Entity Number, **132172**

D. Funding year, PYIII - **07/01/2000 - 06/30/2001**

4. Particular Funding Request Number that is the subject of appeal.
FR#(s) **386412 & 386428 & 386433**

NOTE: Explain your appeal to the SLD. When explaining your appeal, include the precise language or text from the Funding Commitment Decisions Letter that is at the heart of your appeal. By pointing FCD to the exact words that give rise to your appeal, the SLD will be able to more readily understand and respond appropriately to your appeal.

Funding Commitment Decision: $0.00 - 28 Day Waiting Period Violated

Funding Commitment Decision Explanation: The Form 471 application was signed and/or submitted prior to the expiration of the 28 day waiting period from the day of the posting of the Form 470 to the SLD Web Site.

{Consultant} D:\Corel\wpdocs\e-rate\PY III\ASCPC074.WPD