

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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AUG 23 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Request for Review by Consorcio de Escuelas y Bibliotecas de Puerto Rico of Decisions of Universal Service Administration)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. <u>96-45</u>
)	
Changes to the Board of Directors of the National Exchange Carrier Association, Inc.)	CC Docket No. 97-21
)	
Hogar Colegio La Milagrosa)	App. No. 229145, BIN # 200417
Colegio San José)	App. No. 229291, BIN # 158984
Colegio Presbiteriano San Sebastián)	App. No. 230479, BIN # 158930
Academia Adventista Sabana Llana)	App. No. 228960, BIN # 157730
Biblioteca Municipal Caguas)	App. No. 236507, BIN # 199581
Academia Santo Tomas de Aquino Superior)	App. No. 229409, BIN # 200602
Academia Primaria Adventista)	App. No. 228886, BIN # 157724
Saint Patrick's Bilingual School)	App. No. 232457, BIN # 200260
Academia Presbiteriana Rev. Juan E. Mercado)	App. No. 231427, BIN # 199781
Biblioteca Municipal Francisco Alvarez Marrero)	App. No. 236736, BIN # 201228
Biblioteca Toa Baja Jaime Fonalledas Garriga)	App. No. 233246, BIN # 223719
Academia Alexandra)	App. No. 228742, BIN # 159117
Biblioteca Pública de Aguada)	App. No. 237665, BIN # 199608
Academia Adventista del Sur Oeste)	App. No. 228253, BIN # 157718
Academia Pentecostal Bethel)	App. No. 228265, BIN # 197687
Colegio Nacional)	App. No. 232314, BIN # 200546
Academia Adventista del Sur)	App. No. 228263, BIN # 157717
Colegio San Vicente Ferrer)	App. No. 230419, BIN # 200648
Bella Vista Adventist Academy)	App. No. 228788, BIN # 157731
Biblioteca Pública de Toa Baja)	App. No. 237587, BIN # 199694
Colegio San Felipe)	App. No. 229093, BIN # 159193
Colegio Emmanuel, Inc.)	App. No. 232226, BIN # 200611
Escuela Evangélica Unida de Fajardo)	App. No. 231480, BIN # 200063
Academia Regional Adventista del Este)	App. No. 229001, BIN # 159105
Biblioteca Pública Toa Alta)	App. No. 244264, BIN # 199691
Biblioteca Municipal Mayagüez)	App. No. 233513, BIN # 223720
Colegio Santa Rosa Superior)	App. No. 231235, BIN # 201223
Academia Adventista del Oeste)	App. No. 228216, BIN # 157716
Colegio Católico Notre Dame Secundario)	App. No. 229379, BIN # 201210

Academia Cayay)	App. No. 228908, BIN # 200056
Biblioteca Electronica Bo, Esperanza)	App. No. 260586, BIN # 225406
Biblioteca Pública de Loiza)	App. No. 233070, BIN # 199651
Biblioteca Pública Maricao Indiana Alta)	App. No. 237436, BIN # 199654
Colegio CEDI)	App. No. 232404, BIN # 199860
Academia Adventista de Florida)	App. No. 227675, BIN # 197736
Biblioteca Maunabo Rafael Rodríguez González)	App. No. 260104, BIN # 199655
Biblioteca Electrónica Autónomo de Carolina)	App. No. 260589, BIN # 199619
Biblioteca Pública Maricao)	App. No. 233628, BIN # 199653
Piaget Bilingual Academy of Manatí)	App. No. 258270, BIN # 159096
Biblioteca Pública Gurabo)	App. No. 237594, BIN # 199636
<u>(Name Unknown)</u> ¹)	<u>(Unknown)</u>
<u>(Name Unknown)</u>)	<u>(Unknown)</u>
<u>(Name Unknown)</u>)	<u>(Unknown)</u>

To: Common Carrier Bureau

Request for Review and Waiver

Pursuant to Sections 54.719(c) and 54.721 of the Commission’s Rules, 47 C.F.R. §§ 54.719(c), 54.721, the above-referenced applicants (“Applicants”) and the Consorcio de Escuelas y Bibliotecas de Puerto Rico (“CEBPR”) hereby request review of the attached decisions (Exhibit 1) of the School and Libraries Division (“SLD”) of the Universal Service Administrative Company rejecting the above-referenced applications for Year 4 funding because the mailing of the Block 6 Certifications and Item 21 Attachments were not postmarked before the end of the Year 4 filing window ending January 18, 2001. To the extent necessary, Applicants and CEPPR further request a waiver of Section 54.507(c) of the Commission’s Rules, 47 C.F.R. § 54.507(c), and any other FCC rule or SLD policy to permit the consideration of the applications. For the reasons set forth below, the Commission should direct the SLD to accept the applications as having been timely filed during the SLD’s filing window for funding Year 4.

¹ The name or other identification of these institutions is unknown as the SLD notifications which are attached addressed to CEDPR does not provide this information.

I. INTRODUCTION AND STATEMENT OF FACTS.

Applicants are members of CEBPR, a consortium of schools and libraries in Puerto Rico, who filed electronically the above-referenced Form 471 applications with SLD on behalf of the Applicants. As shown on the attached Affidavit of CEBPR's Executive Director, Ms. Ines O'Neill (Exhibit 2), the electronic filing of all applications was properly completed by the close of the Year 4 filing window on January 18, 2001. Based on CEBPR's understanding of the program's procedural requirements, the paper executed Block 6 Certifications and Signature part of the applications and Item 21 Attachments were promptly placed in the United States mail for delivery to SLD on either Friday or Saturday January 19 or 20, 2001. To the best of our knowledge, all mailed papers were received by SLD no later than Monday, January 22, 2001.

Over six months after the submission of the applications, after the start of the program year and the continuation of existing services by the service provider to the many of the Applicants, CEBPR received the attached Notices postmarked July 24 and 30, 2001 rejecting all applications solely because the mailing of the Block 6 Certifications and/or Item 21 attachments were postmarked after the 2001-2002 filing window closed on January 18, 2001.² This was a new requirement for program Year 4. In prior years, Applicants filing electronically were accorded several days after the close of the filing window in which to submit the required paper documentation. No notice of the new and more stringent filing requirement was given by the FCC or SLD on either the paper or electronic version of the Year 4 Form 471 application form

² In addition, in earlier July, CEBPR had previously received rejection notifications with respect to the applications of 44 other schools or libraries which, while not specifying the exact reason, rejected those 44 applications for the same reason. On August 15, 2001, appeals of those rejections were denied by SLD, which denials will be appealed to the FCC in a separate filing.

and accompanying Instructions. Accordingly, CEBPR was not aware of the changed filing requirement.

As hereinafter shown, SLD's attempt to impose this more burdensome and stringent filing requirement only through informal and unofficial web site publications that were not approved by the Office of Management and Budget ("OMB") violates the Paperwork Reduction Act. As the Form 471 form itself notes, "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." See Block 6, Notice to Individuals. The scope of the "currently valid OMB control number" for Form 471 encompasses only the actual form and accompanying FCC Instructions which were followed by CEBPR in this case. Absent OMB approval, more burdensome and stringent information filing requirements lawfully cannot be imposed by SLD. Moreover, SLD's rejection of Applications that were properly filed electronically contravened the Electronic Signatures in Global and National Commerce Act and cannot be sustained for this reason.

II. SLD'S ATTEMPT TO IMPOSE A NEW AND MORE STRINGENT FILING REQUIREMENT REGARDING THE SUBMISSION OF PAPER DOCUMENTS WAS NOT ONLY INADEQUATE TO GIVE PROPER NOTICE TO APPLICANTS THAT SLD HAD CHANGED ITS PROCEDURES, BUT IT ALSO VIOLATES THE PAPERWORK REDUCTION ACT.

The requirement that applicants send hard copies of the Block 6 Certification and Item 21 attachments by the closing of the filing window is a new requirement for program Year 4. While it was noted by SLD in the context of certain informal web site documents,³ the new and more stringent requirements was not set forth on any form or set of Instructions approved by OMB.

Both the paper and electronic versions of FCC Form 471, as well as the FCC Instructions to Form 471 at no time advised Applicants of a date or deadline by which the paper documents had to be mailed or filed with the SLD. The OMB approved Instructions for Form 471, a copy of the pertinent parts which is attached (Exhibit 3), only specifies the following requirements:

You may complete and submit the Form 471 by filing the Form electronically online at the SLD web site, <www.sl.universalservice.org>. If filing your Form 471 electronically, you must also complete and mail to the SLD the following documents in order to successfully complete the submission of your Form 471 application within the application window:

- The Item (21) description(s) of services, and
 - A paper copy of the Block 6 Certification, completed and signed with an original ink signature ...

Similarly, the “Reminders” section on FCC Form 471 Instructions provides that, “If you are filing electronically, you must also complete and sign with an original ink signature a paper copy of your completed Block 6 Certification, your Item (21) Description of Services, and any other attachments in order to successfully complete the submission of your Form 471 within the application window” (Exhibit 4). Thus, while requiring the paper submission of these documents “in order to successfully complete the submission of your Form 471 within the application window,” the OMB approved FCC Instructions at no point specified a specific time deadline for the submission of the paper documents. Furthermore, the instructions for the filing of the paper documents displayed during the electronic filing process at no time advised Applicants of a date or deadline by which the paper documents had to be mailed or filed with the SLD (*See* attachment Exhibit 5). This would have been the most obvious place to inform applicants of the time by which the paper documents had to be received by SLD. Instead, the instructions merely provided the address to send the paper documents, specifying no deadline

³ Form 471 Minimum Processing Standards and Filing Requirements for FY4, Filing Requirements for Forms 471 Filed Manually Online, Items 1 and 3; Tips For Completing Your Form 471, Tip 2; and Pitfalls to Avoid in Filing

whatsoever. Based on this guidance, it was CEBPR's understanding that the SLD only required that the paper copy of Block 6 and Item 21 be promptly submitted by mail or other delivery service following electronic filing.

SLD's attempt to impose and enforce the new and more stringent filing requirement is in clear violation of the Paperwork Reduction Act of 1995 ("PRA").⁴ The PRA provides in pertinent part:

An agency may not make a substantive or material modification to a collection of information after such collection has been approved by the Director [of the Office of Management and Budget], *unless the modification has been submitted to the Director for review and approval* under this subchapter.⁵

A new and more restrictive filing deadline for the paper documents is a substantive and material modification of the OMB approved filing requirements set forth on FCC Form 471 and the accompanying Instructions, particularly in this case because it has been the determiner of whether the funding requests will be considered at all by the SLD. In this specific instance, schools and libraries in Puerto Rico are being denied the opportunity to obtain funding for educational solely purposes because of this new filing requirement. Under the PRA, however, a person is not required to respond to a collection of information unless it has been approved by OMB and displays a currently valid OMB control number.⁶ Accordingly, as the new requirement imposed by SLD was not included on the Form 471 and accompanying Instructions as approved by OMB, the failure to comply with it simply cannot be held against the applicant and used as the sole basis to reject the application.

Form 471, Item 1 and 3. OMB Control Number, as required by 44 U.S.C., § 3507(a)(1)(3).

⁴ Pub. L. No. 104-13, 44 U.S.C. § 3501, *et seq.*

⁵ 44 U.S.C.A. § 3507(h)(3) (1991 & Supp. 2001) (emphasis added).

⁶ FCC Form 471, Block 6.

As indicated above, CEBPR was not aware of this additional requirement at the time the applications were filed electronically and regrets its failure to comply with this one requirement. At the same time, however, under the PRA OMB approved FCC Instructions must take precedence over informal SLD reference material published on the web site. This is particularly true in this case in order to avoid disadvantaging a substantial number of applicants serving very low income areas who urgently need funding. Moreover, particularly in areas where English is not the primary language and web site access is more limited, applicants should not be compelled to rely upon web site instructions that are different than the FCC's published instructions approved by OMB.

III. UNDER THE E-SIGN ACT, ELECTRONICALLY FILED APPLICATIONS MAY NOT BE REJECTED FOR FAILURE TO FILE PAPER DOCUMENTS WITHIN THE FILING WINDOW.

The Electronic Signatures in Global and National Commerce Act, S. 761 ("E-Sign Act"), signed into law on June 30, 2000, establishes the overall framework governing the use of electronic signatures and records in transactions in or affecting interstate and foreign commerce.⁷

In pertinent part, the E-Sign Act provides that:

Notwithstanding any statute, regulation, or other rule of law . . . with respect to any transaction in or affecting interstate or foreign commerce-

- (1) a signature, contract, or other record relating to such transaction may not be denied legal effect, validity, or enforceability solely because it is in electronic form; and
- (2) a contract relating to such transaction may not be denied legal effect, validity, or enforceability solely because an electronic signature or electronic record was used in its formation.⁸

⁷ See Electronic Signatures in Global and National Commerce Act, S. 761, 106th Cong., 2d Sess. (signed into law June 30, 2000).

⁸ E-Sign Act at § 101(a).

Under the E-Sign Act, not only is the electronic filing of applications in lieu of paper forms recognized, but the Act specifically requires that, where the electronic process is used, the electronic filing and signature cannot be denied legal effect simply because of the lack of supporting paper documentation and signature. In this instance, SLD specifically requested applicants to complete the “Certification and Signature” block as part of the electronic Form 471 application. CEBPR’s Executive Director, as evidenced in the attached Affidavit, did so and filed the electronic application during the filing window. Because these Applications contained the legally binding electronic signatures, the legal effect of the electronic filing cannot be rejected by SLD because of the failure to submit documentation in paper form in the electronic filing window. Having itself recognized the validity of electronic signatures and filing procedures without the need for the submission of original signatures or documentation,⁹ the Commission cannot lawfully apply a different and more stringent requirement to the consideration of the applications processed by SLD.

IV. WAIVER OF SECTION 54.507(C) IS REQUIRED IN THE PUBLIC INTEREST.

Where the particular facts of a case make strict compliance inconsistent with the public interest, the Commission previously has waived electronic window filing requirements to ameliorate the effect of imperfect SLD filing window procedures and prevent hardship to the adversely affected applicants.¹⁰ This case presents exactly this type of situation where such

⁹ See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, CC Docket No. 94-129, FCC 00-255, *Third Report and Order and Second Order on Reconsideration*, 15 FCC Rcd 15996 (2000).

¹⁰ See Federal-State Joint Board on Universal Service, Universal Service Support for Eligible Schools and Libraries, Year 3 Filing Window, CC Docket No. 96-45, FCC 00-204, *Order*, 15 FCC Rcd 13932, 13934 ¶ 6 (2000) (*citing WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969)). While the Commission has applied the traditional

relief is required in the public interest. CEBPR followed all Instructions regarding the paper submission of the Block 6 Certification and Item 21 documents set forth in the application form and OMB approved Instructions. It was only through unofficial web site documents, rather than the OMB approved Application form and accompanying Instructions, that notice of the new and more stringent paper filing requirements could have been obtained. Not only did these OMB unapproved notification efforts fail to give actual notice in this case, but their attempted imposition is unlawful under both the Paperwork Reduction Act and the E-Sign Act.

The denial of funding consideration for this reason alone is patently unfair to the Applicants and grossly out of proportion to whatever policy reasons might support enforcement of the more stringent and OMB unapproved paper filing requirements. The overwhelming majority of the Applicants are public schools and libraries eligible for a 90% discount. The local communities in Puerto Rico in which these public schools and libraries are located simply do not have the resources to fund these services on their own. If the rejections are not corrected, many will lose existing services that have been provided in prior years under the E-Rate program. In addition, as the notices were received after the start of the new program year and existing services have been continued, they could face liability for all service costs. Others new to the program will lose the opportunity to commence services to their students and library users. To penalize Puerto Rico students for the Applicants' failure to follow a *new and unknown* procedural requirement that was not lawfully implemented would result in an extremely arbitrary and harsh outcome, which would in no way further the underlying purpose of the policy in

WAIT "hard look" waiver standard in reviewing most SLD determinations to date, it should be noted that CEBPR's instant appeal involves only an SLD application processing guideline that has never been reviewed or adopted by the FCC and accordingly is not a "rule" within the meaning of the Administrative Procedure Act or other statutory requirements. Accordingly, the SLD's guideline is not entitled to any presumption of validity under the standards for administrative consideration of a rule waiver request set forth in WAIT and should be reviewed de Novo by the Commission at the time.

question. In fact, as the paper documents were received within a few days after the close of the filing window, it is difficult to conceive how SLD processing and administrative procedures could have been disadvantaged in any way by the brief delay in receiving the paper documents.

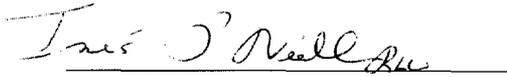
Because of differing economic and cultural conditions, the Commonwealth of Puerto Rico faces a “digital” divide problem far more serious than most continental United States areas. In this case, funding for some of the most disadvantaged and “Information Poor” schools and libraries in Puerto Rico (and in the United States) is being denied because of what in the end must be viewed as no more than an extremely minor and understandable procedural oversight. According to current SLD published data for Year 4, while over \$700,000,000 in funding has been approved nationwide to date, only slightly more than \$8,000 has been approved for one eligible institutions in Puerto Rico.¹¹ These serious imbalances alone require the most careful consideration and grant of this appeal. CEBPR, on behalf of the Applicants, respectfully submits that strict compliance with the SLD’s procedural requirements is consistent with the public interest, and therefore, warrants a waiver Section 54.507(c) of the Commission’s Rules and any other rule or SLD policy necessary to permit consideration of the applications.

V. CONCLUSION.

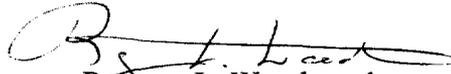
For the reasons stated above, the SLD’s rejection of the above-referenced applications should be reversed and the SLD directed to reinstate the applications for normal consideration as applications filed within the filing window. To the extent necessary, the Commission should waive the requirements of Section 54.507(c) and any other Commission Rule or SLD policy, and direct SLD to deem the above-referenced applications as having been timely filed.

Respectfully submitted,

CONSORICO DE ESCUELAS Y
BIBLIOTECAS DE PUERTO RICO



Ines O'Neill
Executive Director, CEBPR
and Contact Representative
for the Applicants



Ramsey L. Woodworth
Edgar Class III

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600 14th St. N.W., Suite 800
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Counsel for CEBPR

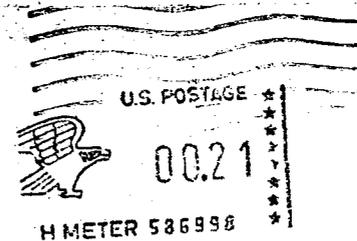
August 23, 2001

¹¹ If calculated on a pro-rata population basis, the citizens of Puerto Rico should expect to receive over \$1,000,000 of the funding approved by SLD to date. This pro rata estimate itself is low given the substantially higher level of poverty and different economic conditions in Puerto Rico.

EXHIBIT 1
SLD/USAC REJECTIONS OF APPLICATIONS



Schools and Libraries Division
P.O. Box 7026
3833 Greenway Drive
Lawrence, KS 66044-7026



Ines O'Neill
HOGAR COLEGIO LA MILAGROSA
530 Ponce de Leon Av
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00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: E-N-0005

MAILING DATE:
July 30, 2001

03



OUTSIDE OF WINDOW FUNDING AVAILABILITY

This card is your notification that your Form 471 application, Block 6 Certifications, and/or Item 21 attachments that were postmarked after the 2001-2002 filing window closed on January 18, 2001, will not be considered for discount funding for the 2001-2002 Funding Year. Sufficient funds are not available.

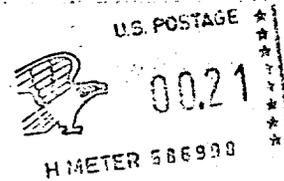
For more information about the processing of 2001-2002 applications, about appealing the status of your Form 471 application, or about plans for the 2002-2003 application process, please visit our web site at www.sl.universalservice.org. If you do not have access to the Internet, please call the Client Service Bureau at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company



Schools and Libraries Division
P.O. Box 7026
3833 Greenway Drive
Lawrence, KS 66044-7026

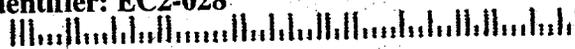
Ines O'Neill
COLEGIO SAN JOSE
530 Ponce de Leon Av
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ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC2-028

MAILING DATE:
July 24, 2001

03



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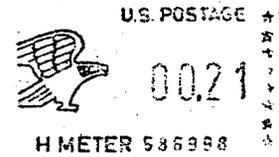
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ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: SFEC1-01

MAILING DATE:
July 24, 2001

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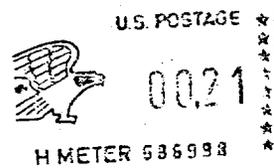
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ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC2-019

MAILING DATE:
July 24, 2001

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Schools and Libraries Division
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Schools and Libraries Division
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U.S. POSTAGE

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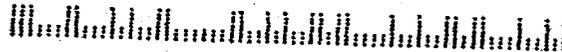
H.METER 569999

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San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: BC2-011

MAILING DATE:
July 24, 2001

00901-2304



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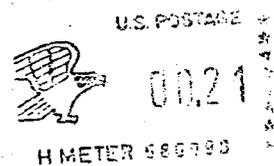
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Schools and Libraries Division
Universal Service Administrative Company



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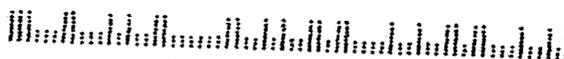


Ines O'Neill
Academia Santo Tomas de Aquino Superior
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San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC2-032

MAILING DATE:
July 24, 2001

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Schools and Libraries Division
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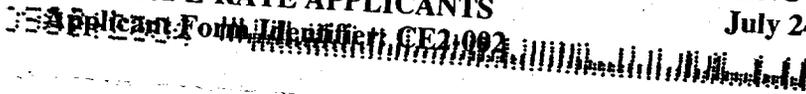
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H METER 586099

Ines O'Neill
ACADEMIA PRIMARIA
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS

MAILING DATE:
July 24, 2001



OUTSIDE OF WINDOW FUNDING AVAILABILITY

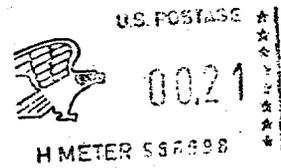
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Schools and Libraries Division
Universal Service Administrative Company



**Schools and Libraries Division
P.O. Box 7026
3833 Greenway Drive
Lawrence, KS 66044-7026**



Ines O'Neill
Saint Patrick's Bilingual School
530 Ponce de Leon Av
San Juan, PR
00901-2304

**ATTENTION:
2001-2002 E-RATE APPLICANTS**
Applicant Form Identifier: NE4-082

**MAILING DATE:
July 24, 2001**

**OUTSIDE OF WINDOW
FUNDING AVAILABILITY**

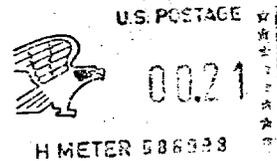
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3833 Greenway Drive
Lawrence, KS 66044-7026



Ines O'Neill
Academia Presbiteriana Reverendo Juan E. Mercado
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS

MAILING DATE:
July 24, 2001



OUTSIDE OF WINDOW FUNDING AVAILABILITY

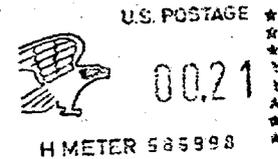
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3833 Greenway Drive
Lawrence, KS 66044-7026



Ines O'Neill
Biblioteca Publica Toa Baja
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: BN3-008

MAILING DATE:
July 24, 2001

00901+2304



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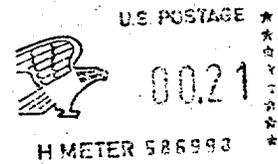
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3833 Greenway Drive
Lawrence, KS 66044-7026



Ines O'Neill
ACADEMIA ALEXANDRA
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS

MAILING DATE:
July 24, 2001

Applicant Form Identifier: DGI 1008

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Schools and Libraries Division
P.O. Box 7026
3833 Greenway Drive
Lawrence, KS 66044-7026

Ines O'Neill
Biblioteca Publica Aguada
530 Ponce de Leon Av
San Juan, PR
00602

ATTENTION:
2000-2001 E-RATE APPLICANTS
Applicant Form Identifier: BC2-012

MAILING DATE:
July 9, 2001

901/2304



**YOUR FORM 471 HAS BEEN RECEIVED -
BUT AFTER THE JANUARY 18 WINDOW CLOSED**

We're sending this card to thank you for your recent Form 471 application but to let you know that your application was received by the Schools and Libraries Division/USAC after the 2001-2002 filing window closed at 11:59 p.m. ET on January 18, 2001.

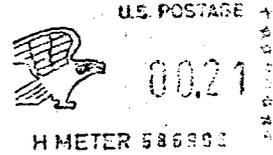
We are holding your application pending final processing of those applications which were received within the filing window. It has not yet been determined whether late-filed Form 471 applications will be considered for discount funding.

For more information about the processing of 2001-2002 applications, or about plans for the 2002-2003 application process, please visit our web site at www.sl.universalservice.org.

School and Libraries Division
Universal Service Administrative Company



Schools and Libraries Division
P.O. Box 7026
3833 Greenway Drive
Lawrence, KS 66044-7026



Ines O'Neill
ACADEMIA ADVENTISTA DEL SUROESTE
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC1-007

MAILING DATE:
July 24, 2001



OUTSIDE OF WINDOW FUNDING AVAILABILITY

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Ines O'Neill
ACADEMIA PENTECOSTAL BETHEL
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC1-009

MAILING DATE:
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03



OUTSIDE OF WINDOW FUNDING AVAILABILITY

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Ines O'Neill
Colegio Nacional
530 Ponce de Leon Av
San Juan, PR
00901-2304

**ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: NE4-025**

**MAILING DATE:
July 24, 2001**

03



OUTSIDE OF WINDOW FUNDING AVAILABILITY

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Ines O'Neill
ACADEMIA ADVENTISTA DEL SUR
530 Ponce de Leon Av
San Juan, PR
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ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC1-006

MAILING DATE:
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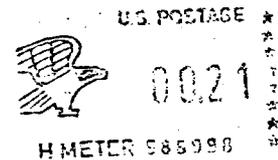
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3833 Greenway Drive
Lawrence, KS 66044-7026



Ines O'Neill
Colegio San Vicente Ferrer
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC2-034

MAILING DATE:
July 24, 2001



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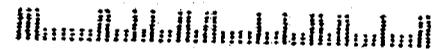
H METER 586893

Ines O'Neill
BELLA VISTA ADVENTIST ACADEMY
530 Ponce de Leon Av, HOSPITAL BELLA VISTA
San Juan, PR
00901-2304

ATTENTION:
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Applicant Form Identifier: EC1-011

MAILING DATE:
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Ines O'Neill
Biblioteca Publica Toa Baja
530 Ponce de Leon Av
San Juan, PR
00901-2304

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Applicant Form Identifier: BC2-009

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COLEGIO SAN FELIPE
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
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Applicant Form Identifier: E-N-0003

MAILING DATE:
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Colegio Enmanuel, Inc
530 Ponce de Leon Av
San Juan, PR
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Applicant Form Identifier: NE4-023

MAILING DATE:
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Ines O'Neill
Escuela Evangelica Unida de Fajardo
530 Ponce de Leon Av, Esquina Isabel Andreu
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MAILING DATE:
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Applicant Form Identifier: NE4-010

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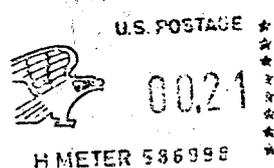
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3833 Greenway Drive
Lawrence, KS 66044-7026



Ines O'Neill
ACADEMIA REGIONAL ADVENTISTA DEL ESTE
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC2-022

MAILING DATE:
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Biblioteca Publica Toa Alta
530 Ponce de Leon Av, Urb Jardines de Toa Alta
San Juan, PR
00901-2304

ATTENTION:
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Applicant Form Identifier: NB4-049

MAILING DATE:
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BIBLIOTECA MUNICIAPAL MAYAGUEZ
530 Ponce de Leon Av, Atrium Office Center
San Juan, PR
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2001-2002 E-RATE APPLICANTS

MAILING DATE:
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Applicant Form Identifier: BN3-009



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Universal Service Administrative Company



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Lawrence, KS 66044-7026



INES O NEILL
CONSORCIO ESCUELAS Y BIBLIOTECAS DE PR, INC.
530 AVENIDA PONCE DE
SAN JUAN, PR
00901-2304

ATTENTION:
2001-2002 E-RATE APPLICANTS
Applicant Form Identifier: EC2-036

MAILING DATE:
July 24, 2001



Colegio Santa Rosa Superior

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Ines O'Neill
ACADEMIA ADVENTISTA DEL OESTE
530 Ponce de Leon Av
San Juan, PR
00901-2304

ATTENTION:
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Applicant Form Identifier: EC1-005

MAILING DATE:
July 24, 2001



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