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September 5, 2001

Magalie Salas
Secretary
Federal Communications Commission
445 12th Street SW
Room TW-A325
Washington, DC 20554

RE: In the Matter of Request for Review of the Decision of the Universal Service Administrator by Oklahoma City Public Schools Under FCC Docket Nos. 97-21 and 96-45

Dear Ms. Salas:

Enclosed please find the original and four copies of the Request for Review of the Oklahoma City Public Schools in the above-referenced matter.

Sincerely,

Orin R. Heend

Funds For Learning, LLC
2111 Wilson Blvd. #700
Arlington, VA 22201

No. of Copies rec'd 0+4
List A B C D E

Attachments

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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

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SEP - 5 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:	)	
	)	
Request for Review of the Decision of the Universal Service Administrator by	)	
	)	
Oklahoma City Public Schools Oklahoma City, OK	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Changes to the Board of Directors of the National Exchange Carrier Association, Inc.	)	CC Docket No. 97-21

To: The Commission

REQUEST FOR REVIEW

Oklahoma City Public Schools ("School District"), by its representative, hereby seeks review of the determination of the Schools and Library Division of the Universal Service Administrative Company ("SLD"), dated August 7, 2001, reducing the School District's request for universal service support in Funding Request No. 663320.

I. Statement of the Facts

Approximately 40,300 students (77% are eligible for free or reduced price lunch) are enrolled in the School District. These students attend school at 91 sites throughout Oklahoma City. Their access to the Internet is via a leased wide area network.

On August 7, 2001, the SLD issued a Funding Commitment Decision Letter ("FCDL") in connection with FRN 663320. (Attachment A). In that FRN, the SLD granted to the School District only *one* month's worth of support ($71,128.71) for its leased wide area network, rather than the full twelve months of support ($853,544.49) that the School District had requested. As discussed in more detail below, the twelve-month amount was readily and unambiguously apparent from the documentation that the School District had included in its Form 471application.

The SLD's single-month funding determination resulted, unfortunately, from a clerical error that appeared originally in one of the School District's Block 5/Form 471 funding requests. The School District tried everything possible, as early as possible, to correct this mistake. It brought the matter to the SLD's attention at the very beginning of the data entry process and again at the Receipt Acknowledgement Letter stage. Even though SLD staff agreed with the School District that the error should be corrected, ultimately, the SLD either failed, neglected, or refused to make the change. We do not know which. Indeed, the answer to that question remains a mystery, as the SLD's FCDL failed to address this keystone issue in *any* respect. Thus, the School District cannot determine whether anyone at the SLD considered this issue seriously before issuing the FCDL. It is impossible, therefore, for the School District to challenge the SLD's rationale because, if one exists, it is not apparent from the record.

The School District first applied for E-rate support for the telecommunications services that are the subject of this appeal ("Leased WAN Service") in Program Year One. That year, the monthly pre-discounted cost for the Leased WAN Service was $82,800. (Attachment B). The following year, the pre-discounted cost was $79,200 per month (Attachment C), and in Program Year Three it was $81,900 per month. (Attachment D). From year to year the annual fee has fluctuated slightly as different school sites have opened and closed.

In Program Year Four, the *monthly* cost of the Leased WAN Service was going to remain in the same price range. According to the service provider, the monthly cost would be $84, 677. (*See* Attachment E - Leased WAN Description of Service at p.6: "Total Monthly Recurring: $84,677").

Unfortunately, on the Form 471, the $84,677 monthly amount was entered by mistake into the *annual* pre-discount cost field (Block 5, Line 23, Column E). (Attachment F). That mistake, in turn, was carried over into the form's monthly pre-discount cost field (Block 5, Line 23, Column C), where the incorrect annual amount then was divided by twelve. That calculation yielded an absurdly low Leased WAN Service charge of $7,056.42 per month for leased 10Mbs service for 91 sites, an average of approximately $78 per month per line. By any objective standard, it was obvious that the dollar amount entered in that field had to have been a mistake. That amount, patently low on its face for a school district of this size and for that amount of bandwidth, was of course only 1/12 of the amount that should have appeared there.

Elsewhere in the Form 471, however, the correct pre-discount cost for the Leased WAN Service clearly did appear. In the tabbed "Service Description" section of the application under a tab labeled "Cox Oklahoma Telecom, Inc. WAN," the School District included a five-page document from the service provider with the heading, "Oklahoma City Public School District Wide Area Network Locations." (Attachment E). That document listed in column format every school in the School District, the service level that every school was to receive, and the monthly recurring charge for that service at that location. More specifically, it showed 91 sites receiving 10Mbs service at $900 per month per site and a group of special programs receiving 1.544 Mbs DS-1 service at the rate of $2,777 per month for a "TOTAL MONTHLY RECURRING" (emphasis in original) charge of $84,677. That amount, obviously, was the amount that was entered by mistake into the annual, rather than into the monthly, pre-discount cost field on the Form 471 (The exact amount on the form actually was four cents more due to a formula embedded in an electronic version of the form.)

After discovering the mistake, which was *before* the SLD had even begun to data-enter any of the Form 471 Block 5 information, the matter was brought immediately to the SLD's attention. A detailed letter along with supporting documentation was faxed to Jon Cruver ("Cruver"), an SLD Problem Resolution supervisor, on March 7, 2001. (Attachment G). John Harrington ("Harrington"), on behalf of the School District, followed up with a telephone call. He explained to Cruver all of the details surrounding the error, pointed to the unambiguous, independent documentation of the

projected cost of the service contained elsewhere in the Form 471, and asked her to make the correction.

Two weeks later, after reviewing the correspondence and considering what Harrington had explained to her, Cruver advised Harrington to contact David Krowll, the data entry specialist assigned to the School District's Form 471, and he did. Harrington reviewed the matter again with Krowll and, on March 21, 2001, faxed to him all of the information and documentation that he had faxed previously to Cruver. (Attachment H). Krowll, in turn, advised him to contact Matthew Banks. Later that day, Harrington spoke with Banks, who instructed him to fax a revised Block 5 that conformed to the service provider's quote of $84,677 per month. Accordingly, Harrington faxed to Banks a new Block 5 containing the correct monthly amount of $84,677.00 in Column A, the correct annual pre-discount amount of $1,016,124.00 (12 months of service at $84,677 per month) in Column I, and the correct total funding commitment request in Column K. (Attachment I).

It was anticipated as a result of that exchange and after submitting the corrected Block 5 that the correction would be made, but, unfortunately, that proved not to be the case. On April 24, 2001, the School District received a Receipt Acknowledgement Letter ("RAL"), dated April 16, 2001, that did not include the corrected amounts. Consequently, the District made the necessary corrections on the RAL and out of necessity returned it by fax to SLD Data Entry Corrections on April 27, 2001. (Attachment J – including fax activity report).

On May 9, 2001, Cathy Turner ("Turner") called the SLD on behalf of the School District to follow up on the corrected RAL to determine whether the correction had been made. The staff person with whom she spoke, "Michelle," could not answer that question, so she advised Turner to send a fax to SLD Data Entry Corrections requesting a status report on the RAL correction. Turner followed Michelle's instructions and sent a fax that day. Turner explained to the SLD why she was writing and, in addition, specifically requested that someone in Data Entry Corrections either fax or call back with a reply. (Attachment K). No one did.

A week went by, and still no one from the SLD had responded to Turner's fax. On May 17, therefore, Turner tried again. This time she spoke with "Don" in the Client Service Bureau, recounting yet again all of the relevant facts. His reply was much more to the point and matter of fact. According to him, the SLD rarely if ever made data corrections, and even though the School District's funding request was in the "data correction stage," an appeal still would have to be filed. In view of the SLD's RAL correction procedure, which the SLD designed and implemented specifically for the purpose of affording applicants the opportunity to make corrections, his reply was surprising and deeply disturbing.

Thereafter, on August 7, 2001, the SLD issued the FCDL that is the subject of this appeal. (Attachment A).

Because the School District did not know whether it could continue to pay its service provider in full each month without benefit of the discounts, and because discussions had already begun to review what costs, if any, could be cut to salvage the service, a crisis was quickly escalating. The district realized that the recurring services and support it lost each month while an appeal might be under review could NEVER be recovered. For applicants caught in this particular bind, victories on appeal six, nine or 12 or more months down the road are partial at best and Pyrrhic at worst.

Because time, in this case, represents money, the School District's objective was and continues to be to get this matter resolved as quickly as possible - if possible. Therefore, on behalf of the School District, Orin Heend sent an e-mail to top SLD officials to determine whether, under the circumstances, this matter could be resolved quickly via an appeal to the SLD. (Attachment L). A follow-up conversation with a senior SLD staff person made it plain that the SLD felt that it had to adhere to its "first in, first out" policy on managing appeals, no matter how straightforward or complex the issue involved. Faced with the prospect of a delay that could not be predicted and that could run many months, the School District chose to appeal directly to the Commission.

II. Issue

Whether the Commission should direct the SLD to correct the School District's Block 5 funding request and issue an amended FRN.

III. Discussion

Under the SLD's own Form 471 processing procedures and pursuant to standards for correcting clerical errors adopted by the Commission, the SLD may not refuse to correct a Form 471 (block 5) funding request where, as here, the applicant has engaged in a timely, affirmative effort to correct the mistake and the correct information appears elsewhere in the application.

A. As the SLD's Form 471 processing procedures recognize that applicants may make mistakes in the amount of funding they request in Block 5 of the application, the SLD provides to applicants an administrative tool known as the Receipt Acknowledgement Letter to correct those mistakes during the application review process.

B. By demonstrating that the correct, monthly cost of the School District's Leased WAN Service was readily available to the SLD in an easily understandable format elsewhere in its Form 471, the School District established that it had made a *bona fide* mistake in its Block 5 funding request that clearly warranted correcting under the Commission's rules.

The "RAL" Process

In *Visitation Academy*[1], the applicant made a cost calculation error in its Form 471. As a result, the applicant received a much smaller amount of funding than it had anticipated. Unlike the School District, however, the applicant in *Visitation Academy* did not file a corrected Receipt Acknowledgement Letter ("RAL") with the SLD. Moreover, it failed to raise the issue at any time during the review process. Under those circumstances, the Commission decided, the applicant forfeited its opportunity to correct its mistake. This result, according to the Commission, was perfectly fair:

1 *Request For Review By Visitation Academy*, CC Docket Nos. 96-45, 97-21, Order, DA 01-655 (Com. Car. Bur. Rel Mar. 14, 2001)

> We see no unfairness in placing the ultimate burden of detecting such cost calculation errors upon the applicant, particularly given that the FCC Form 471 RAL is provided specifically to grant applicants a pre-decision opportunity to detect such errors."[2] (emphasis added)

In stark contrast to the applicant's lack of conduct in *Visitation Academy*, as well as to that of other applicants whose "mistaken dollar amount appeals" have fallen on deaf ears because they too sat on their rights during the application review process,[3] here the School District did everything it conceivably could to correct its mistake. Significantly, it contacted the SLD about the mistake *before* the SLD had even entered the incorrect funding request data into its system. Indeed, the School District, through its representatives, contacted SLD staff repeatedly during the application review process, providing additional documentation and, upon request, even filing a corrected Block 5 funding request. Of course, the School District also filed a corrected RAL. The School District could not possibly have done anything more. Therefore, under its own rules, the SLD should have corrected the mistaken entry in the School District's Block 5 funding request.

A more recent case, *Marion County Public Schools*[4], demonstrates further that the SLD failed to follow its own rules. That case affirmed yet again the critical role the RAL plays in the Form 471 application process. Due to an inadvertent error, the applicant in *Marion County* entered into its funding request a monthly and an annual amount of support that did not add up. Multiplying the monthly amount yielded a total annual funding request of $319,626, but the applicant confused matters by entering a different dollar amount, $391,626, in the total annual cost field. As it turned out, the annual amount was correct, but that was not clear from the face of the request. The SLD decided to award the applicant the lower amount, $319,626. The RAL, however, showed the SLD awarding the higher amount, $391,626. Consequently, the applicant did not respond to the RAL.

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2 *Visitation Academy at p.4.*

3 *See*, e.g. *Request for Review by Roaring Spring Community Library*, CC Docket Nos. 96-45, 97-21, Order, File No.SLD-79875, 15 FCC RCD 4504 (Com. Car. Bur. Rel. Oct. 27, 1999); *Request for Review by Western Wayne School District*, CC Docket Nos. 96-45, 97-21, File No. SLD-107715 (Com. Car. Bur. Rel. July 29, 1999).

4 *Request for Review By Marion County Public Schools,* Order, File No. SLD-138811 (Com Car. Bur. Rel. April 24, 2001)

On appeal, the Commission concluded that the RAL was ineffective because it failed to accomplish its specific purpose. That purpose, the Commission made clear, was to afford the applicant "the opportunity to make corrections" to its Form 471.[5] Accordingly, the Commission granted the applicant's request for review and remanded the case to the SLD for further action, even though it was unclear from the specific request for support exactly how much funding the applicant was requesting.

As a result of *Marion County*, three principles are well settled: (1) the SLD must issue to applicants RALs that accurately reflect the amount of funding that the SLD intends to award; (2) the burden is on applicants to review their RALs and to discover and correct any mistakes; and (3) if applicants discover mistakes in their funding requests and in a timely manner bring them to the SLD's attention, they are entitled to the opportunity to make the corrections. Here, the School District satisfied all of its obligations. It reviewed the RAL, discovered the mistake, and attempted to correct it by filing a corrected RAL. The SLD, on the other hand, failed to fulfill its obligations. For reasons known only to the SLD, it ignored completely the School District's corrected RAL, never even so much as contacting the School District by phone or by e-mail to question the correction. Thus, like the applicant in *Marion County*, the School District was denied the opportunity to make corrections to its Form 471. The result in this case, therefore, should be exactly the same as the result in *Marion County*.

The Commission's Rule of Reason

In *Naperville Community School District* [6], the Commission emphasized that its "primary objective is to ensure that schools and libraries benefit from the schools and libraries universal service support mechanism as contemplated by the statute." Thus, the Commission set forth a "totality of the circumstances" test for determining whether a Request for Review should be granted

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5 *Marion County* at p.3.

6 *Request for Review By Naperville Community Unit School District 203,,* CC Docket Nos. 96-45, 97-21, Order, File No. SLd-203343 (Commission Rel. Feb. 27, 2001) *at p.5*

in cases where the SLD's interest in minimizing administrative costs had to be balanced against the applicant's statutory interest in benefiting from the program. If any test should apply here, that is the one.[7]

In *Naperville,* the SLD rejected the applicant's Form 471 because it failed to conform to the SLD's minimum processing standards. After considering the "totality of the circumstances," the Commission concluded that the SLD should have processed the application. In reaching this conclusion, the FCC emphasized one point in particular, and that was that filling in the missing information on the Form 471 "required merely the ministerial act of repeating a fact readily available and easily discernable elsewhere in the application."[8] That meant, of course, that a detailed SLD review of the application to correct the mistake would not be necessary. The administrative cost of accepting the application in those circumstances, the Commission concluded, would be minimal.

Here, we have exactly the same situation.[9] As described more fully in the bulleted points set forth below and also in the Facts section above, the requisite fact in this case -- *the correct monthly recurring charge for the Leased WAN Service* -- was readily available to the SLD elsewhere in the School District's application. This is reason enough, we submit, not only under *Naperville*, but also pursuant to the SLD's own written standards of appellate review,[10] to remand this matter to the SLD for further action. Such a result is not unprecedented. In fact, *Methacton School District*[11] squarely

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7 In *Marion County*, the Commission remanded the case to the SLD apparently for two reasons: (1) because the RAL was ineffective and (2) because the Commission found the applicant's correction credible. Thus, it is unclear whether an applicant that timely requests a correction need show anything more than a good faith effort to correct a *bona fide* mistake. That showing alone, we submit, sufficiently safeguards the integrity of the program, advances the objective of the program and, at the same time, minimizes any undo administrative burden on the SLD.

8 *Naperville* at p.7

9 This case is clearly distinguishable from *Request for Review by Scranton School District*, CC Docket Nos. 96-45, 97-21, Order, File No. SLD-112318 (Com Car. Bur. Rel. Jan. 7, 2000), where, in contrast, the application was rife with mistakes and inaccuracies and difficult to review. There, the applicant consistently placed monthly projected amounts in both the annual and the monthly fields throughout its application, included projected cost data elsewhere in the application that actually supported, rather than challenged, the accuracy of the allegedly incorrect data, failed to include the correct information anywhere else in the Form 471, and, apparently, never filed a RAL.

10 In the Service Provider Manual posted on the SLD's web site, the SLD describes four circumstances in which it will grant an appeal. Significantly, number two states, "If the appeal makes it clear the applicant made an error in

supports it:[12]

> Under SLD's procedures SLD may grant appeals when the applicant has correctly listed the proper item on another part of the Form 471. SLD states that, if this case were remanded, it 'would treat this as a data entry error made by the applicant and, since there is evidence in the original file to support the correct item, [it] would grant the appeal.'

In any event, applying the "totality of circumstances" test to the pertinent facts surrounding the School District's mistake in this case leads inevitably to the same conclusion -- that on balance, the objectives of the program are better served by directing the SLD to correct the mistake. In this regard, we direct the Commission's attention to the following relevant facts:

- The School District discovered the mistake in its Form 471 Block 5 funding request extremely early in the application review process and brought it immediately to the SLD's attention, even before the SLD began to data-enter the application. (*See* Attachment G). If the SLD had made the correction at that time, the administrative cost of correcting the mistake would have been virtually zero.
- Upon request, the School District submitted to the SLD a corrected Form 471 Block 5 funding request.
- In addition, the School District timely filed a RAL that contained the corrected Form 471 Block 5 information.
- Under a typewritten tab in the Description of Service section of the application, the School District provided service provider documentation that set forth clearly and unambiguously the correct total monthly cost for Leased WAN Service throughout the

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information provided in or with the application, and SLD could have identified the error by the information on hand during initial review" (emphasis added). www.sl.universalservice.org/vendor/manual/Chapter7.doc (Attachment L)

11 *Request for Review by Methacton School District,,* CC Docket Nos. 96-45, 97-21, Order, App. No.120123, (Com Car. Bur. Rel. May 17, 2 000) at p. 3

12 See, also, *Request for Review by DeKalb County School System, Order,* File No. SLD-153570 (Com Car.Bur. Rel. Sept. 4, 2 001) at p.4 ("Our finding is consistent with SLD's policy that, if an applicant made a mistake completing its FCC Form 471 and there was other information contained in the application or provided during the Program Integrity Assurance (PIA) review process that presented the correct information, SLD will grant the appeal so long as the applicant points out the mistake, and demonstrates how SLD could have reasonably ascertained the true nature of the information.")

district. This simple, yet extremely thorough, documentation included a detailed breakdown and description of charges, including the speed of the service to be provided to each school in the district and the cost of that service at each location.

- To correct the Block 5 funding mistake, no detailed examination of the application was necessary, so the SLD easily could have corrected it. As in *Naperville,* the only action that was required of the SLD was "merely the ministerial act of repeating a fact readily available and easily discernable elsewhere in the application."
- The SLD apparently ignored the School District's RAL, rendering it ineffective and violating its own procedures.
- There are several hundreds of thousands of dollars in E-rate support at stake in this FRN. Thus the SLD's failure to correct the School District's inadvertent mistake in its Form 471 Block 5 funding request obviously is having, and will continue to have, a substantial adverse impact on its ability to benefit from the universal support mechanism. The absence of this critical support is placing a tremendous strain on the School District's ability to pay for its Leased WAN Service. Whether or to what extent the School District will be able to maintain this service without E-rate support remains a day-to-day question. Consequently, Internet access for the entire district is in jeopardy.
- The SLD issued the FCDL to the School District without making the correction, without comment, and without explanation.

Unfortunately, mistakes happen. Unfortunately, they frequently happen in the course of completing complex Form 471 applications. The Commission has recognized this as a fact of regulatory life and, to its credit, has refused to take a narrow, strict liability approach to the problem. Instead, noting that its "primary objective" is the success of the E-rate program, the Commission has decided to examine the totality of the circumstances in each case and to determine, in each instance, where the equity lies and whose interests are greater, the applicant's or the SLD's.

After considering the totality of the circumstances set forth and described above, it is evident that the balance of respective interests tips lopsidedly in the School District's favor. Thus, it should

not be surprising to the Commission that equity too is squarely on the applicant's side, and that limiting the School District to universal support to only one month of Leased WAN Service would be extremely harsh and inequitable. We urge the Commission, therefore, also to weigh the following equitable considerations:

- This economically disadvantaged district school district is precisely the kind of applicant that the E-rate program is supposed to help.
- The School District desperately needs the full $853,544 in E-rate support to sustain its high-speed leased network through which its students access the Internet.
- The record will show that the School District's application is otherwise complete, neat, well organized, and accurate in every other respect.
- The School District did not receive its RAL until almost two weeks after the date that was printed on it. Nevertheless, the School District timely filed a corrected copy.
- The School District did *everything* conceivably possible to correct its mistake.
- On the other hand - the SLD requested the School District to submit a corrected Block 5 funding request, but for some reason never processed it or contacted the School District concerning it; in retrospect, it appears the SLD requested it for no apparent reason.
- After requesting the corrected Block 5 funding request, the SLD ignored both the matter and the School District each and every step of the way -- from data entry to Receipt Acknowledgement Letter to Funding Commitment Decision Letter.

There have been cases in which applications, in their entirety, have been prepared carelessly. There have been cases where applicants have been cavalier about communicating with the SLD. There have been cases where applicants have not taken advantage of the procedural avenues open them to make changes in their applications. This is not any one of those cases.

REQUESTED RELIEF

For these reasons, the School District requests that the SLD's funding decision in FRN 663320 be remanded to the SLD with directions to correct the funding request in issue to reflect the $853,544.49 in support that the School District originally requested and, further, to expedite issuing to the School District an amended FRN 663320 for that amount.

Respectfully submitted,

Orin R. Heend
On behalf of Oklahoma City Public Schools

cc: Debbie Sharp
Executive Director of Finance Services
Oklahoma City Public Schools
PO Box 25428 (900 N. Klein)
Oklahoma City, OK 73125-0428

REQUESTED RELIEF

..ese reasons, the School District requests that the SLD's funding decision in FRN 663320 be remanded to the SLD with directions to correct the funding request in issue to reflect the $853,544.49 in support that the School District originally requested and, further, to expedite issuing to the School District an amended FRN 663320 for that amount.

Respectfully submitted on behalf of
OKLAHOMA CITY PUBLIC SCHOOLS

By: _____
Orin R. Heend

Funds For Learning, LLC
2111 Wilson Blvd. (Suite 700)
Arlington, VA 22201
703-351-5070

cc: Debbie Sharp, Executive Director of Finance Services.
Oklahoma City Public Schools
PO Box 25428 (900 N. Klein)
Oklahoma City, OK 73125-0428

FUNDING COMMITMENT REPORT

Form 471 Application Number: 262187
Funding Request Number: 663319 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143001192 Service Provider Name: AT&T Corp.
Contract Number: MTM
Billing Account Number: 1000-174-2617
Earliest Possible Effective Date of Discount: 07/01/2001
Contract Expiration Date: 06/30/2002
Pre-Discount Amount: $12,000.00
Discount Percentage Approved by the SLD: 84%
Funding Commitment Decision: $10,080.00 - FRN approved as submitted

Funding Request Number: 663320 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143005575 Service Provider Name: Cox Oklahoma Telcom,LLC dba Cox
Contract Number: NA
Billing Account Number: OKC9900SY
Earliest Possible Effective Date of Discount: 07/01/2001
Contract Expiration Date: 06/30/2002
Pre-Discount Amount: $84,677.04
Discount Percentage Approved by the SLD: 84%
Funding Commitment Decision: $71,128.71 - FRN approved as submitted

Funding Request Number: 663321 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 143000893 Service Provider Name: Nextel West Corp.
Contract Number: MTM
Billing Account Number: 67199
Earliest Possible Effective Date of Discount: 07/01/2001
Contract Expiration Date: 06/30/2002
Pre-Discount Amount: $14,400.00
Discount Percentage Approved by the SLD: 84%
Funding Commitment Decision: $12,096.00 - FRN approved as submitted

Funding Request Number: 663322 Funding Status: Funded
Services Ordered: Internet Access
SPIN: 143015254 Service Provider Name: OneNet
Contract Number: MTM
Billing Account Number: 1161
Earliest Possible Effective Date of Discount: 07/01/2001
Contract Expiration Date: 06/30/2002
Pre-Discount Amount: $170,400.00
Discount Percentage Approved by the SLD: 84%
Funding Commitment Decision: $143,136.00 - FRN approved as submitted

B

Contact Person's Name Dr. George H. Kimball and Phone Number: 405-297-6712

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			(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) Expir-ation Date	Services or Products	Service Start Date	(8) Estimated One Time Pre-discount Cost	(9) Estimated Monthly Pre-discount Cost	(10) Estimated Total Annual Prediscount Cost	Percentage Discount (from Item 14)
143002379	553080000038015				Telecommunications Services					
		C	04/09/98	04/09/98	Internet Access	06/01/98	$44,000.00	$32,600.00	$272,200.00	90.00%
					Internal Connections (Shared)					
143005575	553080000038015				Telecommunications Services					
		C	04/09/98	04/09/03	Internet Access	06/01/98	$0.00	$82,800.00	$579,600.00	90.00%
					Internal Connections (Shared)					
					Telecommunications Services					
					Internet Access					
					Internal Connections (Shared)					

Attachment B

Contact Person Name Russell Woodward and Phone Number: (405) 29, 585

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) Expir-ation 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)
AT&T Corp. 143001192	377740000224994	T	T	T	Telecommunication Services	07/01/1999		$1,250	$15,000	85%
					Internet Access					
					Internal Connections (Shared)					
OneNet 143015254	377740000224994				Telecommunication Services					
		C	04/02/1999	06/30/2000	Internet Access	07/01/1999		$5,000	$60,000	85%
					Internal Connections (Shared)					
Cox Oklahoma Telcom, Inc. 143005575	917580000211242	C	04/09/1998	06/30/2003	Telecommunication Services	07/01/1999		$79,200	$950,400	85%
					Internet Access					
					Internal Connections (Shared)					

Attachment C