

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

In the Matter of:

	)	
Request for Review of the	)	
Decision of the	)	
Universal Service Administrator by	)	
	)	
Hartford Public Schools	)	
Hartford, Connecticut	)	File Nos. SLD
	)	329165; 329403; 329483
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Changes to the Board of Directors of the	)	CC Docket No. 97-21
National Exchange Carrier Association, Inc.	)	

To: Telecommunications Access Policy Division, Wireline Competition Bureau

**REQUEST FOR REVIEW**

Hartford Public Schools (“School District” or “Hartford”), by its representative, requests the Commission to review the decision of the Schools and Libraries Division (“SLD”) of the Universal Service Administrative Company in the above referenced matter.<sup>1</sup> Alternatively, Hartford requests a waiver of the Commission’s rules.

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<sup>1</sup> Form 471 Application Number	Funding Request Numbers
329483	888788 – 888831
329403	888478 – 888524
329165	887689 – 887732

## I. Summary

At issue is the SLD's decision to reject three Form 471 paper applications for failure to include Discount Worksheet C. (*See Exhibits A, B, and C*). All three applications are consortium applications. Hartford Public Schools filed all three applications on behalf of individual schools within its district and individual library branches within the Hartford Public Library system. The applications included funding requests for *site-specific services only*; there were no funding requests for shared services.

To satisfy the SLD's Minimum Processing Standards, the SLD states that an applicant must include a Block 4 Worksheet that is "relevant" to the application being filed. In each of its applications, the School District included a Worksheet A and B, the only two worksheets that were relevant to its application for site-specific services. (*See Exhibits D and E*). On its Worksheet A, the School District completed a line item for every school in the district and calculated the district-wide discount rate (89%) that would apply to all the branch libraries in the consortium, all of which were located within the school district's geographic boundary. On Worksheet B, the School District listed every branch library for which the consortium would be requesting service along with its discount rate of 89%. Consequently, from a discount worksheet perspective, *all* of the data that the SLD would need to "data enter" the School District's applications were present on Worksheets A and B. That fact notwithstanding, the SLD concluded that the failure to include Worksheet C was enough to cost the School District every one of its funding requests. The SLD's decision, based entirely on the absence of Worksheet C, cost the Hartford Public Schools and the Hartford Public Library System several millions of dollars in E-rate support.

If the School District had included a Worksheet C, there would have been but two entries on it. The School District and its 89% shared discount rate would have appeared on one line and the Library System and its 89% discount rate on the other. Both entries would have been transferred there from entries already on Worksheet A. Moreover, the School District would not even have had to calculate on the worksheet the consortium's

shared discount rate, as it was not requesting discounts on any shared services. Thus if it had made the calculation, the 89% result would have been completely meaningless. This pointless percentage, the simple average of two identical entries, 89% and 89%, would have been obvious even without a Worksheet C. In short, Worksheet C was irrelevant to this consortium's application. Consequently, the SLD's decision to reject all of its applications for that reason was incorrect.

## **II. In the Alternative: Request for Waiver of the Rules**

If the Commission concludes that the SLD was technically correct and its action somehow plausibly justified under a strict, very narrow interpretation of the Commission's rules, then the School District requests a waiver of those rules. It would be inequitable, unjust, and clearly not in the public interest to deny especially needy schools and libraries E-rate support on a technicality, namely the absence of a worksheet, where the absence of that worksheet has no impact whatsoever on the SLD's ability to review the application.

Furthermore, if the result in this case must turn on whether a waiver of the rules is warranted, then it is important for the Commission to understand why the School District left out Worksheet C. Significantly, the School District did not leave it out because it was negligent. Rather, it left out the worksheet because first, the SLD's web site did not function properly, and second, because it followed the SLD's advice. More specifically:

- (a) The School District could not file its three applications online because the SLD's online tool simply would not allow it to file a consortium application *only* for site-specific services. Consequently, it could not take advantage of the SLD's guarantee to applicants that no online application would be rejected for failing to satisfy Minimum Processing Standards.

(b) Because it could not file online, the School District's only option was to file paper applications. The School District contacted the SLD Client Service Bureau for help in this regard, and a representative advised the School District specifically not to include a Worksheet C, because the consortium was not applying for discounts on any shared services.

### **III. Facts**

In its three applications, the School District sought discounts for internal connections under a contract that was bid on behalf of both schools in the School District and branches of the Hartford Public Library system. It recognized that because of the mix of entities involved, it would be defined as a consortium. However, unlike many, if not most, consortia that apply for discounts, the discounts in this case were to be applied for on a site-specific, rather than a shared basis. In other words, each school and library branch would be permitted to qualify for discounts at its own discount rate, rather than the simple average of all consortia members.

In the 2002 Funding Year, the SLD strongly encouraged applicants to file online. The SLD advised applicants that electronic submissions would not only speed the review process, but also guarantee that applications so submitted would automatically meet Minimum Processing Standards and thus avoid automatic rejection for that reason.

The SLD's online records show that the School District tried several times to begin an application that would address its particular situation, namely a consortium that wished to request funding on a site-specific basis. (*See* Exhibit F – Applicant Form Identifiers: multiple entries for Y5-Wireless-TCI and Y5-LWAN2-SBC). Because the services were internal connections for installation at each school and library location, it was appropriate for each entity to receive services at that facility's discount rate, rather than at the shared rate of the consortium. This was the correct way to apply. Moreover, it was the only way to guarantee at least some funding for the consortium's low-income, 90%-schools. Using the consortium's average discount rate of 89 %, which would have

been wrong in any event, potentially could have cost those needy schools all of their E-rate support, if commitments at the 90% discount rate wound up fully depleting the program's funding for the year.

Bob Richter, Executive Director of Technical Services, made several attempts to enter Hartford's data electronically, but unfortunately he was unable to get very far due to internal programming errors on the SLD's web site. The specific difficulty he encountered was that, once he selected the application type, "Consortium," the SLD's Website would not allow him to enter site-based requests. (*See Exhibit F*).<sup>2</sup>

Because of the difficulty he had encountered trying to file online, Mr. Richter decided to call the SLD Client Service Bureau for help. The SLD's Debbie Wilburn worked with him for about 45 minutes trying to resolve the problem until she too finally gave up. After consulting with her supervisor, Ms. Wilburn recommended to Mr. Richter that he file his applications on paper.

Mr. Richter then sought to clarify with Ms. Wilburn whether he would need to file a Block 4 Worksheet C. That particular worksheet, she told him, would not yield any

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<sup>2</sup> A review of the list of Form 471 applications that were at least started for the school district (Exhibit F) apparently reflects a mix of applications that were started by Bob Richter online and then ones that the SLD began to data-enter from paper applications and then ultimately rejected. Even though the SLD rejected the three applications for failure to pass Minimum Processing Standards, it appears that the SLD went ahead and entered all the funding requests before encountering the same issue that Bob Richter did--namely difficulty in entering a site-specific discount rate on a consortium application. (If the Minimum Processing Standards were designed to save the SLD from "burden," clearly the system did not work in this case because the SLD proceeded to data enter many Block 5 requests without regard to what Block 4 worksheet was provided.) Moreover, Block 4 of the application that was data entered by the SLD is incorrectly labeled "No data." The paper application had provided all the pertinent information and, in fact, the SLD should have been able to data-enter a specific entity number for each funding request. Instead that item on each individual funding request is left blank--presumably the same problem that Mr. Richter encountered when he tried to do his own application.

Form 471 Application #300873 (Exhibit G), which appears to be one of the applications that Mr. Richter started, included a Worksheet C that specified all the schools in the district. However, when Mr. Richter tried to create a funding request, it appears he was only permitted to enter Entity Number 122325, the entity number for the entire school district. Because that choice generated a discount rate of 89%, that was not the correct information.

useful information to SLD reviewers, so it would not be necessary.<sup>3</sup> They had discussed and agreed as follows:

- all of the funding requests were for site-based services, making a shared discount rate calculation unnecessary;
- Worksheet A would yield the site-specific discount rates for all of the schools in the consortium, as well as the School District's weighted average discount rate that would apply to each library branch; and finally,
- Worksheet B would list all of the library branches covered by the consortium application.

In other words, according to Ms. Wilburn, if Mr. Richter included Worksheets A and B, those two worksheets would include all of the information that the SLD would need to process the three consortium applications.

Accordingly, when Mr. Richter prepared the paper applications for the School District, he followed the SLD's instructions. He included a Worksheet A that detailed the school lunch data for every school in the School District and a Discount Worksheet B that listed every library branch and the fact that every branch was located in the School District. Nevertheless, the SLD still rejected all three applications for failing to include a Worksheet C. In rejecting the applications for this reason, the SLD did not dispute that the applications included two other fully and properly completed worksheets, namely A and B. Nor did the SLD contend that they were deficient in any other respect.

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<sup>3</sup> The completed Worksheet C would say, literally: Hartford Public Schools 89%; Hartford Public Library 89%; Shared Discount Calculation 89%. The 89 % shared discount rate would never be cited elsewhere on the application.

#### IV. Discussion

##### A. THE THREE CONSORTIUM APPLICATIONS SATISFIED THE SLD'S MINIMUM PROCESSING STANDARDS BECAUSE THEY INCLUDED ALL OF THE DISCOUNT WORKSHEETS NECESSARY TO PROCESS THEM.

###### 1. Discount worksheets A and B are the only discount worksheets relevant to purely site-specific consortium applications.

The relevant portion of the Minimum Processing Standards instructions in effect at the time (*See* Exhibit H, FCC Form 471 Instructions – November 2001, at p. 6) state as follows:

Block 4 Worksheet: At least one completed Block 4 Worksheet *relevant to your application* (see Block 1, Item 5) must be submitted. If a relevant Block 4 Worksheet is not submitted, or the Worksheet is missing information, the form will be rejected. (Emphasis added).

Because the School District was not seeking discounts on a shared basis across the whole or even a part of the consortium, Worksheet C, the worksheet that is designated for consortia applications, was not actually “relevant” in this matter for the purposes of application review or SLD administration. Instead, the School District submitted every worksheet that was relevant to its applications, namely Worksheet A for the schools in the School District (and to provide the basis for the library system’s discounts) and Worksheet B for the library branches. Each worksheet was complete, and because each of the application’s funding requests referenced a specific entity that was listed in either Worksheet A or Worksheet B, the application was not missing any information that the SLD would have needed to review the funding requests.

We believe that it is a reasonable standard to expect an applicant to submit at least one properly completed Block 4 discount worksheet with its application. Here, the applicant submitted two worksheets that contained all of the discount information that the SLD would have needed to review its funding requests to ensure that the appropriate

discount rate was cited. Further, each of its funding requests correctly cited the number of the entity whose discount rate should be applied, all of which were listed in the worksheets that accompanied the application.

**2. Not every consortium application requires a Worksheet C; therefore, the SLD reviewers should not reject automatically every consortium application that does not include one.**

“Minimum processing requirements,” in the words of the SLD, “are necessary in order to ensure the timely and efficient processing of properly completed applications.” (See Exhibit H, FCC Form 471 Instructions at p. 6). Under the SLD’s administrative processes, it appears from this experience that application reviewers are instructed to reject automatically a consortium application that does not include a Worksheet C, possibly because the SLD fears that it would burden the SLD if it had to contact the consortium manager to collect all of the information necessary to calculate a shared consortium discount rate or because the SLD database was not programmed to accommodate any other logical alternative. However, in this case, the reviewers were missing no information. Because each funding request referenced a particular site, the SLD had all the information it needed to proceed to review the application, namely a worksheet that calculated the discount rate for each school in the School District, and a worksheet that demonstrated that each library branch was eligible at the discount rate of the overall School District.<sup>4</sup>

It is interesting to note the anomaly that would have occurred if the School District had filed only a Worksheet C. If the School District had filed that worksheet alone, without a Worksheet A to demonstrate how it had calculated the applicable rate for the library branches, the application in those circumstances apparently would have passed muster in the Minimum Processing Standards review -- even though it would have been largely incomplete *and* required a substantial amount of back-and-forth between the

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<sup>4</sup> If the SLD maintains that Worksheet C provides a list of consortium members that it will ultimately need in the case of an Item 25 review or for purposes of compliance with the Children’s Internet Protection Act, the answer to that is that the two members of this consortium easily could have been discerned.

applicant and the SLD to provide the additional information necessary for application review.

At the other extreme, if the School District had filed all three worksheets, A, B, and C, Worksheet C would have been superfluous, simply duplicating information that the School District had already provided in Worksheets A and B. Moreover, because the School District was applying for discounts on services on a purely site-specific basis, there would have been no need to use Worksheet C to detail the membership of a group receiving “shared” services, as may be the case in other consortia applications.

While it is appropriate to reject an application that fails to provide any relevant Block 4 discount worksheet, the experience is that the precise worksheets that would be required can only be determined by a closer review of the application. For instance, a School District might be able to file a single worksheet, or it might be required to file several, if it applies for shared services on behalf of several different subgroups. Similarly, the worksheets that ultimately might be required for a consortium applicant would depend on the nature of its members—what mix of eligible and ineligible entities were applying, and whether on a shared or site-specific basis.

The Form 471 instructions available at the time the School District completed its 2002 application, those dated November 2001, specified that various worksheets were supposed to be filed, based on how the applicant defined itself in Block 1 (school, School District, library or consortium). However, the instructions for the “Block 4: Discount Calculation Worksheets” specify that, “This block consists of three separate worksheets *designed to meet the needs of*” those filing as schools, libraries or consortia. (*Instructions* at p. 12) (Emphasis added).

Note that the emphasis here is on the needs of the applicant, rather than the needs of the SLD. The implication is that an applicant should choose whatever worksheets are necessary to detail its particular situation. As a practical matter, there is no hard and fast

rule on precisely what worksheets will ultimately be needed to complete the review of an application.

For instance, a Catholic church might be the billed entity for a “consortium” of an eligible parochial school and a church building. The church, as the entity paying the bill, would presumably need to file as a consortium. But, as there is only one entity receiving eligible services, there would be no practical need for any worksheet other than Worksheet A to be filed. Similarly, a county government might have signed a contract for services for the county library system and its own offices. Technically, this, too, amounts to a consortium application, but as a practical matter, Worksheet B, in this case, would be sufficient because ineligible entities are not supposed to be listed in the discount worksheets. In the case of the applicant here, it was similarly a consortium but one in which all of the applicable discount rates could be found on Worksheet A and B so there was no practical reason why Worksheet C was necessary.

**B. THE SLD’S DECISION TO REJECT THESE CONSORTIUM FORM 471 APPLICATIONS FOR FAILURE TO SATISFY MINIMUM PROCESSING STANDARDS REPRESENTS A MARKED DEPARTURE FROM COMMISSION PRECEDENT AND SHOULD BE REVERSED FOR THAT REASON.**

In *Wayne County Regional Educational Service Agency*<sup>5</sup>, the SLD rejected the service agency’s application for a Minimum Processing Standards violation because it attached a worksheet of its own creation to its application, not the Block 4 worksheet itself. In this case, the School District supplied all of the required information using the OMB-approved Block 4 worksheets.

In the *Wayne County* decision, the Commission correctly explained the purpose of Block 4: “In Block 4, an entity is listed together with its associated discount rate. Groups

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<sup>5</sup> *Request for Review by Wayne County Regional Educational Service Agency, September 20, 2002.*

of entities that will be receiving shared services are listed with their average rate.” *Wayne County* at p. 2. The School District met that standard in this case, listing all of the entities involved, and in the case of the library branches, the necessary documentation (namely the calculation of the School District’s weighted average) to back up the discount rate cited for the library system. As there was no other “shared rate,” in this application, there was no practical need to list a group of entities—that is, to complete Worksheet C.

In rejecting the application in *Wayne County*, the Commission noted the many services that the SLD provides to enable applicants to gain assistance with their applications, including contacting the SLD’s Client Service Bureau “for assistance with the application process.” *Wayne County* at p. 4. In the course of trying to complete its application, first online and then on paper, the School District did, in fact, seek the assistance of the SLD in resolving its questions. The School District is not citing the incorrect advice it was given as the basis for its appeal. Rather, it is citing that to demonstrate its diligence in trying to provide all the information that the SLD would require at this stage, which, in fact, it did.

As noted in the record described in an August 6, 2002 appeals decision involving the Indiana Intelenet Commission,<sup>6</sup> the SLD’s Program Integrity Assurance unit *does* contact consortia applicants “to resolve issues regarding Block 4 applications” and, in that case, asked the applicant to submit “certain revisions to Block 4.” In Hartford’s case, PIA would have had all the information it needed to proceed with the application review and so there was no burden involved, in contrast, apparently, to the time that the SLD spent trying to resolve discrepancies between the Block 4 and Block 5 information submitted by the Indiana Intelenet Commission before some of its modified funding requests were ultimately rejected.<sup>7</sup>

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<sup>6</sup> *Request for Review by Indiana Intelenet Commission* at p. 2 (rel. August 6, 2002)

<sup>7</sup> In an earlier case, *Request for Review by Indiana Intelenet Commission* (rel. April 24, 2002), the Commission rejected the claim that the applicant had ever submitted a Worksheet C and, on that basis, upheld the SLD’s decision to reject the consortium’s application. However, nothing in the Commission’s discussion of the facts in that case, nor in any online filing or form that we have been able to locate, shows that the consortium there, like the consortium here, did not request discounts on shared services or that the

In an appeal decision involving the *Charles Gibson Public Library*,<sup>8</sup> which failed to submit any discount worksheet, the Commission noted that a worksheet “is an essential component of the application because it enables SLD to calculate the discount amount that an applicant may receive.” *Gibson* at p. 3. Hartford met that standard in this case, because it submitted the two “relevant” worksheets, namely the ones that were required to enable the SLD to calculate the appropriate discounts. Worksheet C, by that standard, was actually “irrelevant” because the discount rate that it calculates was not cited in this particular application. Therefore, the absence of Worksheet C would not have prevented the SLD from data-entering the application.

Significantly, in *Litchfield Public Schools*<sup>9</sup>, the Commission reversed the SLD’s decision to reject an application for failure to satisfy Minimum Processing Standards because the information that the applicant had omitted from its application, the Commission explained, “should not have prevented” the SLD from data-entering the application. Under the precedent that the Commission established in *Litchfield*, therefore, the SLD should not have rejected the Hartford applications.

In its oft-cited *Naperville*<sup>10</sup> decision, the Commission concluded that a very technical violation of the SLD’s Minimum Processing Standards related to discount worksheet information was not enough to warrant rejecting the applicant’s entire funding request. The Commission observed that its “primary objective,” which was “to ensure that schools and libraries benefit from the schools and libraries universal service support mechanism,” would not be served under the circumstances by such an outcome. *Naperville* at p.5. The Commission’s discussion of the policy considerations underlying its *Naperville* decision demonstrates that the Commission believed very strongly that it

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parties or the Commission ever addressed that issue in the context of that particular case. There is certainly no public record that these were the facts or that any such deliberations ever occurred. That case, therefore, is instructive regarding the importance of Worksheet C, but by no means controlling precedent so far as the specific facts in this case are concerned.

<sup>8</sup> *Request for Review by Charles Gibson Public Library* (rel. May 13, 2002).

<sup>9</sup> *Request for Review by Litchfield Public Schools* (rel. Nov. 12, 2002)

<sup>10</sup> *Request for Review by Naperville Community Unit School District 203* (rel. February 27, 2001).

needed to pave a road to the “right” result where technical rule violations were concerned. We address each of those considerations in turn below:

- *Naperville at p.7*: “The administrative cost of accepting Naperville’s application under these facts are minimal and are outweighed by the objective of ensuring that schools and libraries benefit from the schools and libraries universal service support mechanism as contemplated by the statute.”
  - Hartford: There was, in fact, no administrative cost involved in accepting the Hartford application, because the SLD, in fact, had all the information it needed to review the appropriate discount rates.
- *Naperville at p.6*: The “omitted” information could easily have been discerned by the SLD through examination of other information included in the application.
  - Hartford: No information was omitted from the Hartford application. The appropriate discount rates were all provided, and the members of the consortium were easily discerned by reviewing the entities cited individually in the funding requests.
- *Naperville at p.7*: The application is otherwise substantially complete.
  - Hartford: Again, the applicant submitted all of the required application blocks and provided all of the information that the SLD would have needed to review its requests.
- *Naperville at p.6*: Because the SLD had started gathering information in a substantially different manner on a revised Form 471, the Commission was concerned that “some applicants might misunderstand” how they were expected to respond to certain requests for information.
  - Hartford: Although the 2002 Form 471 application remained the same, the SLD’s online form failed to work “as advertised,” and the SLD’s instructions only made matters worse. As in *Naperville*, the Commission should be concerned that advice the SLD staff member gave to Hartford with respect to Worksheet C ultimately proved to be

wrong. More so than in *Naperville*, it is easy to see why Hartford misunderstood how exactly the SLD expected it to respond.

**C. WAIVER OF THE COMMISSION’S RULES IS APPROPRIATE  
BECAUSE THE RATIONALE BEHIND THE MINIMUM PROCESSING  
STANDARD AT ISSUE DOES NOT APPLY TO THE FACTS IN THIS  
SPECIFIC CASE, MAKING THE APPLICATION OF IT NEITHER JUST,  
EQUITABLE, NOR IN THE PUBLIC INTEREST.**

Waiver of the rules under 47 C.F.R. § 1.3 “is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule.”<sup>11</sup> In *Request for Review by Lynwood Unified School District*,<sup>12</sup> in circumstances far less compelling than those present here, the Commission granted a waiver of the service extension deadline to “increase the likelihood that [the school district] may successfully utilize discounts available from the schools and libraries universal service mechanism.” The issue in this case, in sharp contrast, is not whether the city of Hartford, Connecticut’s school and library systems will be able to successfully utilize their discounts from the universal service mechanism, but whether they will have any discounts on internal connections to utilize at all.

In *Lynwood*, the Commission concluded that waiving the rules would serve the public interest. Surely, therefore, a waiver is justified here for the same reason. In this case, through no fault of its own, the School District filed its applications without a worksheet that the SLD did not need either to data-enter or, thereafter, to review its applications. The School District included all of the requisite discount and entity information on discount worksheets that undisputedly were made a part of the School District’s three applications. There is no allegation that the School District’s large and complex applications were deficient in any other respect. To deny any internal connections funding to schools and libraries in some of the nation’s most economically

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<sup>11</sup> See *Request for Review by Lynwood Unified School District* at p. 2 (rel. Oct. 8, 2002),

<sup>12</sup> *Lynwood* at p.3.

disadvantaged communities for this reason could not possibly serve the public interest. Accordingly, in the alternative, the School District requests that the rules be waived to permit further processing of its Funding Year 2002 applications.

**V. Conclusion**

The School District contends that the applications satisfy Minimum Processing Standards because they included, as those Standards require, at least one Worksheet relevant to the application being filed. The School District contends further that the SLD's decision departed substantially from the principles that the Commission has established in other cases involving the application of the SLD's Minimum Processing Standards. Finally, the School District maintains that the SLD's action unfairly penalizes it because, following the SLD's instructions, it had first tried to file an online application, and only proceeded to file on paper when, after consultation with an SLD staff member, it was determined that it could not file an online application with the correct information. Moreover, instructions not to include a Worksheet C came directly from the SLD. These facts make it all the more clear that rejecting all three of the Hartford consortium's applications solely because it did not include a worksheet that was meaningless under the circumstances would be unjust, inequitable, undeservedly punitive and, most certainly, not in the public interest.

Accordingly, the School District requests that the Commission reverse the SLD's decision and remand this matter to the SLD for further and expedited processing of Hartford's three Funding Year 2002 internal connections applications.

Respectfully submitted on behalf of  
HARTFORD PUBLIC SCHOOLS

By: \_\_\_\_\_  
Orin R. Heend  
Funds For Learning, LLC  
2111 Wilson Blvd. Suite #700  
Arlington, VA 22201  
703-351-5070

cc: Bob Richter  
Executive Director of Technical Services  
Metro Hartford Information Services  
260 Constitution Plaza  
Hartford, CT 06103



**Administrator's Decision on Appeal - Funding Year 2002-2003**

October 17, 2002

Bob Richter  
Hartford Public Schools  
153 Market Street  
Hartford, CT 06103

Re: **Billed Entity Number:** 122325  
**471 Application Number:** 329165  
**Funding Request Number(s):** 887689, 887690, 887691, 887692, 887693,  
887694, 887695, 887696, 887697, 887698,  
887699, 887700, 887701, 887702, 887703,  
887704, 887705, 887706, 887707, 887708,  
887709, 887710, 887711, 887712, 887713,  
887714, 887715, 887716, 887717, 887718,  
887719, 887720, 887721, 887722, 887723,  
887724, 887725, 887726, 887727, 887728,  
887729, 887730, 887731, 887732  
**Your Correspondence Dated:** March 22, 2002

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 Five 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 60-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 Number: 887689, 887690, 887691, 887692, 887693, 887694,  
887695, 887696, 887697, 887698, 887699, 887700,  
887701, 887702, 887703, 887704, 887705, 887706,  
887707, 887708, 887709, 887710, 887711, 887712,  
887713, 887714, 887715, 887716, 887717, 887718,  
887719, 887720, 887721, 887722, 887723, 887724,  
887725, 887726, 887727, 887728, 887729, 887730,  
887731, 887732

Decision on Appeal: **Denied in Full**

Explanation:

- You are requesting SLD to reconsider the decision of rejecting your Form 471. Your appeal letter stated that it is unfair to reject this Form 471 because of SLD Website problems and bad advice received from the SLD Helpline.
- The original submission of this funding request was missing a complete Worksheet C in Block 4 for your "consortium" application, which caused the form to be rejected for failing to meet the minimum processing standards for that form. Forms that do not meet the minimum processing standards are not considered for funding. Your appeal has not shown that the request was improperly denied. Consequently, this funding request will not be data entered and your appeal is denied.

If you believe there is a basis for further examination of your application, you may file an appeal with the Federal Communications Commission (FCC) via United States Postal Service: FCC, Office of the Secretary, 445-12<sup>th</sup> Street SW, Washington, DC 20554. If you are submitting your appeal to the FCC by other than United States Postal Service, check the SLD web site for more information. Please reference CC Docket Nos. 96-45 and 97-21 on the first page of your appeal. **The FCC must RECEIVE your appeal WITHIN 60 DAYS OF THE ABOVE DATE ON THIS LETTER for your appeal to be filed in a timely fashion.** Further information and new options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site, [www.sl.universalservice.org](http://www.sl.universalservice.org).

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

Schools and Libraries Division  
Universal Service Administrative Company



**Administrator's Decision on Appeal - Funding Year 2002-2003**

October 17, 2002

Bob Richter  
Hartford Public Schools  
153 Market Street  
Hartford, CT 06103

Re:	Billed Entity Number:	122325
	471 Application Number:	329403
	Funding Request Number(s):	888478, 888479, 888480, 888481, 888482, 888483, 888484, 888485, 888486, 888487, 888488, 888489, 888490, 888491, 888492, 888493, 888494, 888495, 888496, 888497, 888498, 888499, 888500, 888501, 888502, 888503, 888504, 888505, 888506, 888507, 888508, 888509, 888510, 888511, 888512, 888513, 888514, 888515, 888516, 888517, 888518, 888519, 888520, 888521, 888522, 888523, 888524

**OCT 23 2002**

Your Correspondence Dated: March 22, 2002

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 Five 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 60-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.

<u>Funding Request Number:</u>	888478, 888479, 888480, 888481, 888482, 888483, 888484, 888485, 888486, 888487, 888488, 888489, 888490, 888491, 888492, 888493, 888494, 888495, 888496, 888497, 888498, 888499, 888500, 888501, 888502, 888503, 888504, 888505, 888506, 888507, 888508, 888509, 888510, 888511, 888512, 888513, 888514, 888515, 888516, 888517, 888518, 888519, 888520, 888521, 888522, 888523, 888524
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Decision on Appeal:

**Denied in Full**

Explanation:

- You are requesting SLD to reconsider the decision of rejecting your Form 471. Your appeal letter stated that it is unfair to reject this Form 471 because of SLD Website problems and bad advice received from the SLD Helpline.
- The original submission of this funding request was missing a complete Worksheet C in Block 4 for your "consortium" application, which caused the form to be rejected for failing to meet the minimum processing standards for that form. Forms that do not meet the minimum processing standards are not considered for funding. Your appeal has not shown that the request was improperly denied. Consequently, this funding request will not be data entered and your appeal is denied.

If you believe ~~there is a basis~~ for further examination of your application, you may file an appeal with the Federal Communications Commission (FCC) via United States Postal Service: FCC, Office of the Secretary, 445-12<sup>th</sup> Street SW, Washington, DC 20554. If you are submitting your appeal to the FCC by other than United States Postal Service, check the SLD web site for more information. Please reference CC Docket Nos. 96-45 and 97-21 on the first page of your appeal. **The FCC must RECEIVE your appeal WITHIN 60 DAYS OF THE ABOVE DATE ON THIS LETTER for your appeal to be filed in a timely fashion.** Further information and new options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site, [www.sl.universalservice.org](http://www.sl.universalservice.org).

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

Schools and Libraries Division  
Universal Service Administrative Company



**Administrator's Decision on Appeal - Funding Year 2002-2003**

October 17, 2002

Bob Richter  
Hartford Public Schools  
153 Market Street  
Hartford, CT 06103

Re: Billed Entity Number: 122325  
471 Application Number: 329483  
Funding Request Number(s): 888788, 888789, 888790, 888791, 888792,  
888793, 888794, 888795, 888796, 888797,  
888798, 888799, 888800, 888801, 888802,  
888803, 888804, 888805, 888806, 888807,  
888808, 888809, 888810, 888811, 888812,  
888813, 888814, 888815, 888816, 888817,  
888818, 888819, 888820, 888821, 888822,  
888823, 888824, 888825, 888826, 888827,  
888828, 888829, 888830, 888831

Your Correspondence Dated: March 22, 2002

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 Five 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 60-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 Number: 888788, 888789, 888790, 888791, 888792, 888793,  
888794, 888795, 888796, 888797, 888798, 888799,  
888800, 888801, 888802, 888803, 888804, 888805,  
888806, 888807, 888808, 888809, 888810, 888811,  
888812, 888813, 888814, 888815, 888816, 888817,  
888818, 888819, 888820, 888821, 888822, 888823,  
888824, 888825, 888826, 888827, 888828, 888829,  
888830, 888831

Decision on Appeal: **Denied in Full**

Explanation:

- You are requesting SLD to reconsider the decision of rejecting your Form 471. Your appeal letter stated that it is unfair to reject this Form 471 because of SLD Website problems and bad advice received from the SLD Helpline.
- The original submission of this funding request was missing a complete Worksheet C in Block 4 for your “consortium” application, which caused the form to be rejected for failing to meet the minimum processing standards for that form. Forms that do not meet the minimum processing standards are not considered for funding. Your appeal has not shown that the request was improperly denied. Consequently, this funding request will not be data entered and your appeal is denied.

If you believe there is a basis for further examination of your application, you may file an appeal with the Federal Communications Commission (FCC) via United States Postal Service: FCC, Office of the Secretary, 445-12<sup>th</sup> Street SW, Washington, DC 20554. If you are submitting your appeal to the FCC by other than United States Postal Service, check the SLD web site for more information. Please reference CC Docket Nos. 96-45 and 97-21 on the first page of your appeal. **The FCC must RECEIVE your appeal WITHIN 60 DAYS OF THE ABOVE DATE ON THIS LETTER for your appeal to be filed in a timely fashion.** Further information and new options for filing an appeal directly with the FCC can be found in the “Appeals Procedure” posted in the Reference Area of the SLD web site, [www.sl.universalservice.org](http://www.sl.universalservice.org).

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

Schools and Libraries Division  
Universal Service Administrative Company

Entity Number 122325 Applicant's Form Identifier Y5 - Wireless -TCI  
 Contact Person Bob Richter Phone Number (860) 695-8499

## Block 4: Discount Calculation Worksheet A for Schools/School Districts

**Worksheet #A- 1**  
**Page 1 of 4**

**Instructions:** If you are filing a School/School District application, use this worksheet to calculate the discount rate for site-specific services and/or to determine the weighted average discount calculations for shared services.

**10a If you are:**

- **Applying for discounts ONLY for an individual school, or ONLY site-specific services:** Complete columns 1-7 only for each school. Add and number pages as needed. Then use each school's Entity Number and its discount from Column 7 to complete Block 5 site-specific service to that school.
- **Applying for discounts on services shared by ALL schools in the district (with or without site-specific services as well):** Complete all columns 1-8 for all schools in the district. Then use the Weighted Average Discount in 10c (below) to complete Block 5 for shared services.
- **Applying for discounts on different shared services shared by different groups of schools (with or without site-specific services as well):** Complete one worksheet, columns 1-8 PLUS 10c, for EACH different group of schools sharing a service. Designate this worksheet A-1, A-2, A-3, etc.

**10b List entities and calculate discount(s).**

School District Name: Hartford Public Schools School District Entity Number: 122325

1 Name of Eligible School	2 Entity Number	3 Urban or Rural U or R	4 Total # of Students	5 # of Students Eligible for NSLP	6 % Students Eligible for NSLP (Col. 5 ÷ Col. 4)	7 Discount % from Discount Matrix	8 Weighted Product for Calculating Shared Discount (Col. 4 x Col. 7)
Barbour ES	5432	U	85	85	100.00%	90%	76.50
Barnard-Brown ES	5317	U	403	402	99.75%	90%	362.70
Batchelder ES	5337	U	572	477	83.39%	90%	514.80
Betances ES	5326	U	376	368	97.87%	90%	338.40
Burns ES	5325	U	696	676	97.13%	90%	626.40
Burr ES	5396	U	729	706	96.84%	90%	656.10
Clark ES	5434	U	431	421	97.68%	90%	387.90
Dwight ES	5399	U	531	511	96.23%	90%	477.90
Fisher ES	5388	U	709	603	85.05%	90%	638.10
<b>Totals for calculating Weighted Average Discount</b>							

**10c Weighted Average Discount % for Shared Services** (Col. 8 total divided by Col. 4 total. Round to nearest %) → Calculated on Last Sheet

Entity Number 122325 Applicant's Form Identifier Y5 - Wireless -TCI  
 Contact Person Bob Richter Phone Number (860) 695-8499

## Block 4: Discount Calculation Worksheet A for Schools/School Districts

Worksheet #A- 1  
Page 2 of 4

**Instructions:** If you are filing a School/School District application, use this worksheet to calculate the discount rate for site-specific services and/or to determine the weighted average discount calculations for shared services.

- 10a If you are:**
- **Applying for discounts ONLY for an individual school, or ONLY site-specific services:** Complete columns 1-7 only for each school. Add and number pages as needed. Then use each school's Entity Number and its discount from Column 7 to complete Block 5 site-specific service to that school.
  - **Applying for discounts on services shared by ALL schools in the district (with or without site-specific services as well):** Complete all columns 1-8 for all schools in the district. Then use the Weighted Average Discount in **10c** (below) to complete Block 5 for shared services.
  - **Applying for discounts on different shared services shared by different groups of schools (with or without site-specific services as well):** Complete one worksheet, columns 1-8 PLUS 10c, for EACH different group of schools sharing a service. Designate this worksheet A-1, A-2, A-3, etc.

**10b List entities and calculate discount(s).**  
 School District Name: Hartford Public Schools School District Entity Number: 122325

1 Name of Eligible School	2 Entity Number	3 Urban or Rural U or R	4 Total # of Students	5 # of Students Eligible for NSLP	6 % Students Eligible for NSLP (Col. 5 ÷ Col. 4)	7 Discount % from Discount Matrix	8 Weighted Product for Calculating Shared Discount (Col. 4 x Col. 7)
Fox ES	5394	U	1069	1046	97.85%	90%	962.10
HTLA	5338	U	245	245	100.00%	90%	220.50
Hooker ES	5335	U	351	341	97.15%	90%	315.90
Kennelly ES	5400	U	897	686	76.48%	90%	807.30
King ES	5390	U	732	688	93.99%	90%	658.80
Kinsella ES	5331	U	463	459	99.14%	90%	416.70
Learning Corridor	213082	U	352	232	65.91%	80%	281.60
McDonough ES	5333	U	559	526	94.10%	90%	503.10
Milner ES	5392	U	573	562	98.08%	90%	515.70
Totals for calculating Weighted Average Discount							

**10c Weighted Average Discount % for Shared Services** (Col. 8 total divided by Col. 4 total. Round to nearest %)

→ Calculated on Last Sheet

Entity Number 122325 Applicant's Form Identifier Y5 - Wireless -TCI  
 Contact Person Bob Richter Phone Number (860) 695-8499

## Block 4: Discount Calculation Worksheet A for Schools/School Districts

Worksheet #A- 1  
Page 3 of 4

**Instructions:** If you are filing a School/School District application, use this worksheet to calculate the discount rate for site-specific services and/or to determine the weighted average discount calculations for shared services.

**10a If you are:**

- **Applying for discounts ONLY for an individual school, or ONLY site-specific services:** Complete columns 1-7 only for each school. Add and number pages as needed. Then use each school's Entity Number and its discount from Column 7 to complete Block 5 site-specific service to that school.
- **Applying for discounts on services shared by ALL schools in the district (with or without site-specific services as well):** Complete all columns 1-8 for all schools in the district. Then use the Weighted Average Discount in **10c** (below) to complete Block 5 for shared services.
- **Applying for discounts on different shared services shared by different groups of schools (with or without site-specific services as well):** Complete one worksheet, columns 1-8 PLUS 10c, for EACH different group of schools sharing a service. Designate this worksheet A-1, A-2, A-3, etc.

**10b List entities and calculate discount(s).**

School District Name: Hartford Public Schools School District Entity Number: 122325

1 Name of Eligible School	2 Entity Number	3 Urban or Rural U or R	4 Total # of Students	5 # of Students Eligible for NSLP	6 % Students Eligible for NSLP (Col. 5 ÷ Col. 4)	7 Discount % from Discount Matrix	8 Weighted Product for Calculating Shared Discount (Col. 4 x Col. 7)
Moylan ES	154119	U	573	539	94.07%	90%	515.70
Naylor ES	5403	U	581	450	77.45%	90%	522.90
Oxford Center - Central Offices	190798	U	0	0	0.00%	89%	0.00
Parkville ES	5328	U	596	565	94.80%	90%	536.40
Rawson ES	5385	U	329	233	70.82%	80%	263.20
Sanchez ES	5324	U	482	469	97.30%	90%	433.80
Sand ES	5436	U	393	379	96.44%	90%	353.70
Simpson-Waverly ES	5387	U	328	306	93.29%	90%	295.20
Twain ES	5383	U	338	302	89.35%	90%	304.20
Totals for calculating Weighted Average Discount							

**10c Weighted Average Discount % for Shared Services** (Col. 8 total divided by Col. 4 total. Round to nearest %)

Calculated on Last Sheet

Entity Number 122325 Applicant's Form Identifier Y5 - Wireless -TC  
 Contact Person Bob Richter Phone Number (860) 695-8499

## Block 4: Discount Calculation Worksheet A for Schools/School Districts

**Worksheet #A- 1**  
**Page 4 of 4**

**Instructions:** If you are filing a School/School District application, use this worksheet to calculate the discount rate for site-specific services and/or to determine the weighted average discount calculations for shared services.

- 10a If you are:**
- Applying for discounts **ONLY** for an individual school, or **ONLY** site-specific services: Complete columns 1-7 only for each school. Add and number pages as needed. Then use each school's Entity Number and its discount from Column 7 to complete Block 5 site-specific service to that school.
  - Applying for discounts on services shared by **ALL** schools in the district (with or without site-specific services as well): Complete all columns 1-8 for all schools in the district. Then use the Weighted Average Discount in 10c (below) to complete Block 5 for shared services.
  - Applying for discounts on different shared services shared by different groups of schools (with or without site-specific services as well): Complete one worksheet, columns 1-8 PLUS 10c, for EACH different group of schools sharing a service. Designate this worksheet A-1, A-2, A-3, etc.

**10b List entities and calculate discount(s).**

School District Name: Hartford Public Schools School District Entity Number: 122325

1 Name of Eligible School	2 Entity Number	3 Urban or Rural U or R	4 Total # of Students	5 # of Students Eligible for NSLP	6 % Students Eligible for NSLP (Col. 5 ÷ Col. 4)	7 Discount % from Discount Matrix	8 Weighted Product for Calculating Shared Discount (Col. 4 x Col. 7)
Webster ES	5320	U	457	393	86.00%	90%	411.30
West Middle ES	5319	U	795	764	96.10%	90%	715.50
Wish ES	5431	U	421	419	99.52%	90%	378.90
Fox MS	5389	U	781	702	89.88%	90%	702.90
Quirk MS	5437	U	1215	1136	93.50%	90%	1093.50
South MS	5402	U	692	655	94.65%	90%	622.80
Bulkeley HS	5395	U	1834	1464	79.83%	90%	1650.60
Hartford Public HS	5322	U	1477	1265	85.65%	90%	1329.30
Sports-Sciences Academy	204133	U	313	285	91.05%	90%	281.70
Weaver HS	5382	U	1280	680	53.13%	80%	1024.00
Totals for calculating Weighted Average Discount			22658				20196.10

**10c Weighted Average Discount % for Shared Services** (Col. 8 total divided by Col. 4 total. Round to nearest %)

**89%**

Entity Number 122325 Applicant's Form Identifier Y5-Wireless-TCI  
 Contact Person Bob Richter Phone Number (860) 695-8499

## Block 4: Discount Calculation Worksheet B For Libraries

Worksheet #B- \_\_\_\_\_ of \_\_\_\_\_  
 Page \_\_\_\_\_ of \_\_\_\_\_  
 (For Administrator's Use)

**Instructions:** If you are filing a library application, use this worksheet to calculate the discount rate(s) for outlets/branches and systems.

- 10a If you are:**
- Applying for discounts **ONLY** for one outlet/branch or **ONLY** for site-specific services: Complete columns 1-5 only for each outlet/branch. Add and number pages as needed.
  - Applying for discounts on services shared by **ALL** outlets/branches in the library system (with or without site-specific services as well): Complete columns 1-5 PLUS 10c below.
  - Applying for discounts on **different shared services that are shared by different groups of outlets/branches:** Complete one worksheet, columns 1-5 PLUS 10c, for EACH different group of outlets/branches sharing a service. Designate this worksheet B-1, B-2, B-3, etc.

**10b List entities and calculate discount(s).**  
 Library System Name: \_\_\_\_\_ Library System Entity Number: \_\_\_\_\_

1 Name of Eligible Library (outlet/branch)	2 Entity Number (1-10 digits)	3	4 Name of School District in which outlet/branch in Column 1 is located	5 Weighted Average Discount for the School District in Column 4 (round to nearest %)
Albany Avenue Branch	5391		Hartford Public Schools	89.00%
Barbour Branch	5433		Hartford Public Schools	89.00%
Blue Hills Branch	5384		Hartford Public Schools	89.00%
Campfield Branch	5398		Hartford Public Schools	89.00%
Dwight Branch	5327		Hartford Public Schools	89.00%
Goodwin Branch	5336		Hartford Public Schools	89.00%
Hartford Public Library - Main Branch	227325		Hartford Public Schools	89.00%
Mark Twain Branch	5323		Hartford Public Schools	89.00%
Park Branch	5329		Hartford Public Schools	89.00%
Ropkins Branch	5435		Hartford Public Schools	89.00%
Totals for calculating Shared Discount				890.00%
<b>10c Shared Discount % (Col. 5 total divided by # of outlets/branches in Col. 1. Round to nearest %)</b>				<b>89.00%</b>

**CANCEL**

**Schools and Libraries Service Program  
Services Ordered and Certification Form 471  
Application Status Display**

**Entity Number:      Funding Year: 2002  
122325**

<b>Application Status</b>	<b>Explanation</b>
Form Canceled	This Form 471 has been canceled. No further processing will occur on this form. A Form 471 can move to this status at any time during processing.
Application In Process	Block 1 information from this Form 471 has been data entered by either the applicant (if this form was submitted electronically) or by the SLD (if this form was submitted manually) and an Application Number has been assigned. NOTE: If your Form 471, including your Block 6 certification, was submitted manually <b>OR</b> if your Form 471 was submitted electronically but your Block 6 certification was submitted manually, your application could still fail Minimum Processing Standards (MPS) and be returned to you. If this form fails MPS, you will no longer be able to check the status of this Form 471.
Certification Not Completed	You have clicked the "Submit" button to file your Form 471 online, but the Block 6 certification process has not yet been completed (whether you submit your Block 6 certification electronically or manually). If you file your Form 471 manually, you will not see this status.
Certified	Form 471 (whether electronic or paper), including the Block 6 certification, has been successfully data entered.
RAL Issued - 'xx/xx/xxxx'	A Receipt Acknowledgment Letter (RAL) has been generated after the successful data entry of Blocks 1-5 of this Form 471. The Status date indicates the date on the RAL.
In Review	This Form 471 is being reviewed by Program Integrity Assurance for program compliance. The Billed Entity may be contacted and asked to provide additional information while the form is in this status.
FCDL Issued - 'xx/xx/xxxx'	A Funding Commitment Decision Letter (FCDL) has been generated after one or more funding decisions were issued on Block 5 Funding Request(s) in this Form 471. The Status date indicates the date on the FCDL. NOTE: More than one FCDL can be issued for a Form 471. If more than one FCDL has been issued for this Form 471, the Status date indicates the date on the most recent FCDL.

Form 471 Application Number	Applicant Form Identifier	Application Status
288628	Y5 - LLD	FCDL Issued - 07/01/2002
289821	Y5 - Cellular	FCDL Issued - 07/01/2002
300699	Y5-Internet-ATT	Application In Process
300701	Y5-Internet-ATT	Form Canceled
300798	Y5-Wireless-TCI	Application In Process
300873	Y5-Wireless-TCI	Application In Process
300885	345	Application In Process
302266	Y5 - Video - TCI	FCDL Issued - 10/08/2002
303654	Y5 - Internet - ATT	FCDL Issued - 07/01/2002
303732	Y5 - Shared	FCDL Issued - 11/04/2002
307342	Y5 - ISS - SBC	FCDL Issued - 07/01/2002
316804	Y5 - Terminal Servers	Application In Process
316854	Y5 - Terminal Servers	FCDL Issued - 07/01/2002
329165	Y5-LWAN2-SBC	Application In Process
329403	Y5-WIRELESS-TCI	Application In Process

Previous

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**Schools and Libraries Universal Service Program  
Services Ordered and Certification Form 471  
Application Display**

**Block 1: Billed Entity Information**

**Applicant's Form Identifier:** Y5-Wireless-TCI  
**471 Application Number:** 300873 **Funding Year:** 07/01/2002 - 06/30/2003 **Billed Entity Number:** 122325

**Name:** HARTFORD SCHOOL SYSTEM  
**Address:** 153 MARKET ST  
**City:** HARTFORD **State:** CT **Zip:** 06103 1325

**Contact Name:** Bob Richter  
**Address:** 153 MARKET ST  
**City:** HARTFORD **State:** CT **Zip:** 06103 1325

**Type of Application:** CONSORTIUM

**Ineligible Orgs:** N

**Block 3: Impact of Services Ordered in THIS Application**

**Number of students to be served:** 23000

**Number of library patrons to be served:** 100000

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
k. Other technology outcomes: (please specify):	Wired LAN	Wireless LAN

**Block 4: Worksheets**

**Worksheet C No:** 359012

**Entity Count:** 2

**Sum. Discount (Sum. Column 3):** 178%

**Shared Discount:** 89%

**1. Library System Name:** HARTFORD PUBLIC LIBRARY

**2. Entity Number:** 214822

**Prep. Worksheet No:** 359015

**3. Discount:** 89%

**1. School District Name:** HARTFORD SCHOOL SYSTEM

**2. Entity Number:** 122325

**Prep. Worksheet No:** 359013

**3. Discount:** 89%

**Prep. Worksheet A No:** 359013    **Student Count:** 22658

**School District Name:** HARTFORD SCHOOL SYSTEM

**Entity Number:** 122325

**Weighted Product (Sum. Column 8):** 20196.1

**Shared Discount:** 89%

**1. School Name:** BARBOUR ELEMENTARY SCHOOL

**2. Entity Number:** 5432    **3. Rural/Urban:** Urban

**4. Student Count:** 85    **5. NSLP Students:** 85    **6. NSLP Students/Students:** 100.000%

**7. Discount:** 90%    **8. Weighted Product:** 76.5

**1. School Name:** BARNARD-BROWN ELEM SCHOOL

**2. Entity Number:** 5317    **3. Rural/Urban:** Urban

**4. Student Count:** 403    **5. NSLP Students:** 402    **6. NSLP Students/Students:** 99.751%

**7. Discount:** 90%    **8. Weighted Product:** 362.7

**1. School Name:** BATCHELDER ELEMENTARY SCHOOL

**2. Entity Number:** 5337    **3. Rural/Urban:** Urban

**4. Student Count:** 572    **5. NSLP Students:** 477    **6. NSLP Students/Students:** 83.391%

**7. Discount:** 90%    **8. Weighted Product:** 514.8

**1. School Name:** BETANCES ELEMENTARY SCHOOL

**2. Entity Number:** 5326    **3. Rural/Urban:** Urban

**4. Student Count:** 376    **5. NSLP Students:** 368    **6. NSLP Students/Students:** 97.872%

**7. Discount:** 90%    **8. Weighted Product:** 338.4

**1. School Name:** BULKELEY HIGH SCHOOL

**2. Entity Number:** 5395    **3. Rural/Urban:** Urban

**4. Student Count:** 1834    **5. NSLP Students:** 1464    **6. NSLP Students/Students:** 79.825%

**7. Discount:** 90%    **8. Weighted Product:** 1650.6

**1. School Name:** BURNS ELEMENTARY SCHOOL

**2. Entity Number:** 5325    **3. Rural/Urban:** Urban

**4. Student Count:** 696    **5. NSLP Students:** 676    **6. NSLP Students/Students:** 97.126%

**7. Discount:** 90%    **8. Weighted Product:** 626.4

**1. School Name:** BURR ELEMENTARY SCHOOL

**2. Entity Number:** 5396    **3. Rural/Urban:** Urban

**4. Student Count:** 729    **5. NSLP Students:** 706    **6. NSLP Students/Students:** 96.844%

**7. Discount:** 90%    **8. Weighted Product:** 656.1

**1. School Name:** CLARK ELEMENTARY SCHOOL

**2. Entity Number:** 5434    **3. Rural/Urban:** Urban

**4. Student Count:** 431    **5. NSLP Students:** 421    **6. NSLP Students/Students:** 97.679%

**7. Discount:** 90%    **8. Weighted Product:** 387.9

**1. School Name:** DWIGHT ELEMENTARY SCHOOL

**2. Entity Number:** 5399    **3. Rural/Urban:** Urban

**4. Student Count:** 531    **5. NSLP Students:** 511    **6. NSLP Students/Students:** 96.233%

**7. Discount:** 90%    **8. Weighted Product:** 477.9

**1. School Name:** FISHER ELEMENTARY SCHOOL

**2. Entity Number:** 5388    **3. Rural/Urban:** Urban

**4. Student Count:** 709    **5. NSLP Students:** 603    **6. NSLP Students/Students:** 85.049%

**7. Discount:** 90%    **8. Weighted Product:** 638.1

**1. School Name:** FOX ELEMENTARY SCHOOL

2. **Entity Number:** 5394    3. **Rural/Urban:** Urban  
 4. **Student Count:** 1069    5. **NSLP Students:** 1046    6. **NSLP Students/Students:** 97.848%  
 7. **Discount:** 90%    8. **Weighted Product:** 962.1

1. **School Name:** FOX MIDDLE SCHOOL  
 2. **Entity Number:** 5389    3. **Rural/Urban:** Urban  
 4. **Student Count:** 781    5. **NSLP Students:** 702    6. **NSLP Students/Students:** 89.884%  
 7. **Discount:** 90%    8. **Weighted Product:** 702.9

1. **School Name:** HARTFORD PUBLIC HIGH SCHOOL  
 2. **Entity Number:** 5322    3. **Rural/Urban:** Urban  
 4. **Student Count:** 1477    5. **NSLP Students:** 1265    6. **NSLP Students/Students:** 85.646%  
 7. **Discount:** 90%    8. **Weighted Product:** 1329.3

1. **School Name:** HARTFORD SPORTS - SCIENCES ACADEMY  
 2. **Entity Number:** 204133    3. **Rural/Urban:** Urban  
 4. **Student Count:** 313    5. **NSLP Students:** 285    6. **NSLP Students/Students:** 91.054%  
 7. **Discount:** 90%    8. **Weighted Product:** 281.7

1. **School Name:** HARTFORD TRANSITIONAL LEARNING ACADEMY  
 2. **Entity Number:** 5338    3. **Rural/Urban:** Urban  
 4. **Student Count:** 245    5. **NSLP Students:** 245    6. **NSLP Students/Students:** 100.000%  
 7. **Discount:** 90%    8. **Weighted Product:** 220.5

1. **School Name:** HOOKER ELEMENTARY SCHOOL  
 2. **Entity Number:** 5335    3. **Rural/Urban:** Urban  
 4. **Student Count:** 351    5. **NSLP Students:** 341    6. **NSLP Students/Students:** 97.151%  
 7. **Discount:** 90%    8. **Weighted Product:** 315.9

1. **School Name:** KENNELLY ELEMENTARY SCHOOL  
 2. **Entity Number:** 5400    3. **Rural/Urban:** Urban  
 4. **Student Count:** 897    5. **NSLP Students:** 686    6. **NSLP Students/Students:** 76.477%  
 7. **Discount:** 90%    8. **Weighted Product:** 807.3

1. **School Name:** KING ELEMENTARY SCHOOL  
 2. **Entity Number:** 5390    3. **Rural/Urban:** Urban  
 4. **Student Count:** 732    5. **NSLP Students:** 688    6. **NSLP Students/Students:** 93.989%  
 7. **Discount:** 90%    8. **Weighted Product:** 658.8

1. **School Name:** KINSELLA ELEMENTARY SCHOOL  
 2. **Entity Number:** 5331    3. **Rural/Urban:** Urban  
 4. **Student Count:** 463    5. **NSLP Students:** 459    6. **NSLP Students/Students:** 99.136%  
 7. **Discount:** 90%    8. **Weighted Product:** 416.7

1. **School Name:** LEARNING CORRIDOR  
 2. **Entity Number:** 213082    3. **Rural/Urban:** Urban  
 4. **Student Count:** 352    5. **NSLP Students:** 232    6. **NSLP Students/Students:** 65.909%  
 7. **Discount:** 80%    8. **Weighted Product:** 281.6

1. **School Name:** MCDONOUGH ELEMENTARY  
 2. **Entity Number:** 5333    3. **Rural/Urban:** Urban  
 4. **Student Count:** 559    5. **NSLP Students:** 526    6. **NSLP Students/Students:** 94.096%  
 7. **Discount:** 90%    8. **Weighted Product:** 503.1

1. **School Name:** MILNER ELEMENTARY SCHOOL  
 2. **Entity Number:** 5392 3. **Rural/Urban:** Urban  
 4. **Student Count:** 573 5. **NSLP Students:** 562 6. **NSLP Students/Students:** 98.080%  
 7. **Discount:** 90% 8. **Weighted Product:** 515.7

1. **School Name:** MOYLAN ELEMENTARY SCHOOL  
 2. **Entity Number:** 154119 3. **Rural/Urban:** Urban  
 4. **Student Count:** 573 5. **NSLP Students:** 539 6. **NSLP Students/Students:** 94.066%  
 7. **Discount:** 90% 8. **Weighted Product:** 515.7

1. **School Name:** NAYLOR ELEMENTARY SCHOOL  
 2. **Entity Number:** 5403 3. **Rural/Urban:** Urban  
 4. **Student Count:** 581 5. **NSLP Students:** 450 6. **NSLP Students/Students:** 77.452%  
 7. **Discount:** 90% 8. **Weighted Product:** 522.9

1. **School Name:** OXFORD CENTER--HPSS CENTRAL OFFICES  
 2. **Entity Number:** 190798 3. **Rural/Urban:** Urban  
 4. **Student Count:** 0 5. **NSLP Students:** 0 6. **NSLP Students/Students:**  
 7. **Discount:** 89% 8. **Weighted Product:** 0

1. **School Name:** PARKVILLE COMMUNITY ELEM SCH  
 2. **Entity Number:** 5328 3. **Rural/Urban:** Urban  
 4. **Student Count:** 596 5. **NSLP Students:** 565 6. **NSLP Students/Students:** 94.798%  
 7. **Discount:** 90% 8. **Weighted Product:** 536.4

1. **School Name:** QUIRK MIDDLE SCHOOL  
 2. **Entity Number:** 5437 3. **Rural/Urban:** Urban  
 4. **Student Count:** 1215 5. **NSLP Students:** 1136 6. **NSLP Students/Students:** 93.497%  
 7. **Discount:** 90% 8. **Weighted Product:** 1093.5

1. **School Name:** RAWSON ELEMENTARY SCHOOL  
 2. **Entity Number:** 5385 3. **Rural/Urban:** Urban  
 4. **Student Count:** 329 5. **NSLP Students:** 233 6. **NSLP Students/Students:** 70.820%  
 7. **Discount:** 80% 8. **Weighted Product:** 263.2

1. **School Name:** SANCHEZ ELEMENTARY SCHOOL  
 2. **Entity Number:** 5324 3. **Rural/Urban:** Urban  
 4. **Student Count:** 482 5. **NSLP Students:** 469 6. **NSLP Students/Students:** 97.302%  
 7. **Discount:** 90% 8. **Weighted Product:** 433.8

1. **School Name:** SAND EVERYWHERE ELEMENTARY SCH  
 2. **Entity Number:** 5436 3. **Rural/Urban:** Urban  
 4. **Student Count:** 393 5. **NSLP Students:** 379 6. **NSLP Students/Students:** 96.437%  
 7. **Discount:** 90% 8. **Weighted Product:** 353.7

1. **School Name:** SIMPSON-WAVERLY ELEM SCHOOL  
 2. **Entity Number:** 5387 3. **Rural/Urban:** Urban  
 4. **Student Count:** 328 5. **NSLP Students:** 306 6. **NSLP Students/Students:** 93.292%  
 7. **Discount:** 90% 8. **Weighted Product:** 295.2

1. **School Name:** SOUTH MIDDLE SCHOOL  
 2. **Entity Number:** 5402 3. **Rural/Urban:** Urban  
 4. **Student Count:** 692 5. **NSLP Students:** 655 6. **NSLP Students/Students:** 94.653%  
 7. **Discount:** 90% 8. **Weighted Product:** 622.8

1. **School Name:** TWAIN ELEMENTARY SCHOOL  
 2. **Entity Number:** 5383    3. **Rural/Urban:** Urban  
 4. **Student Count:** 338    5. **NSLP Students:** 302    6. **NSLP Students/Students:** 89.349%  
 7. **Discount:** 90%    8. **Weighted Product:** 304.2

1. **School Name:** WEAVER HIGH SCHOOL  
 2. **Entity Number:** 5382    3. **Rural/Urban:** Urban  
 4. **Student Count:** 1280    5. **NSLP Students:** 680    6. **NSLP Students/Students:** 53.125%  
 7. **Discount:** 80%    8. **Weighted Product:** 1024

1. **School Name:** WEBSTER ELEMENTARY SCHOOL  
 2. **Entity Number:** 5320    3. **Rural/Urban:** Urban  
 4. **Student Count:** 457    5. **NSLP Students:** 393    6. **NSLP Students/Students:** 85.995%  
 7. **Discount:** 90%    8. **Weighted Product:** 411.3

1. **School Name:** WEST MIDDLE ELEM SCHOOL  
 2. **Entity Number:** 5319    3. **Rural/Urban:** Urban  
 4. **Student Count:** 795    5. **NSLP Students:** 764    6. **NSLP Students/Students:** 96.100%  
 7. **Discount:** 90%    8. **Weighted Product:** 715.5

1. **School Name:** WISH ELEMENTARY SCHOOL  
 2. **Entity Number:** 5431    3. **Rural/Urban:** Urban  
 4. **Student Count:** 421    5. **NSLP Students:** 419    6. **NSLP Students/Students:** 99.524%  
 7. **Discount:** 90%    8. **Weighted Product:** 378.9

**Prep. Worksheet B No:** 359015    **Library Outlets/Branches:** 10  
**Library System Name:** HARTFORD PUBLIC LIBRARY  
**Entity Number:** 214822  
**Sum. Discount (Sum. Column 4):**    **Shared Discount:** 89%  
 890

1. **Library Name:** ALBANY AVENUE BRANCH LIBRARY  
 2. **Entity Number:** 5391  
 3. **School District where library outlet/branch is located:** HARTFORD SCHOOL SYSTEM    4. **Discount:** 89%

1. **Library Name:** BARBOUR BRANCH LIBRARY  
 2. **Entity Number:** 5433  
 3. **School District where library outlet/branch is located:** HARTFORD SCHOOL SYSTEM    4. **Discount:** 89%

1. **Library Name:** BLUE HILLS BRANCH LIBRARY  
 2. **Entity Number:** 5384  
 3. **School District where library outlet/branch is located:** HARTFORD SCHOOL SYSTEM    4. **Discount:** 89%

1. **Library Name:** CAMPFIELD BRANCH LIBRARY  
 2. **Entity Number:** 5398  
 3. **School District where library outlet/branch is located:** HARTFORD SCHOOL SYSTEM    4. **Discount:** 89%

1. **Library Name:** DWIGHT BRANCH LIBRARY  
 2. **Entity Number:** 5327  
 3. **School District where library outlet/branch is located:** HARTFORD SCHOOL

SYSTEM 4. Discount: 89%

1. Library Name: GOODWIN MEMORIAL BR LIBRARY  
 2. Entity Number: 5336  
 3. School District where library outlet/branch is located: HARTFORD SCHOOL SYSTEM 4. Discount: 89%

1. Library Name: HARTFORD PUBLIC LIBRARY-MAIN BRANCH  
 2. Entity Number: 227325  
 3. School District where library outlet/branch is located: HARTFORD SCHOOL SYSTEM 4. Discount: 89%

1. Library Name: MARK TWAIN BRANCH LIBRARY  
 2. Entity Number: 5323  
 3. School District where library outlet/branch is located: HARTFORD SCHOOL SYSTEM 4. Discount: 89%

1. Library Name: PARK BRANCH LIBRARY  
 2. Entity Number: 5329  
 3. School District where library outlet/branch is located: HARTFORD SCHOOL SYSTEM 4. Discount: 89%

1. Library Name: ROPKINS BRANCH LIBRARY  
 2. Entity Number: 5435  
 3. School District where library outlet/branch is located: HARTFORD SCHOOL SYSTEM 4. Discount: 89%

**Block 5: Discount Funding Request(s)**

FRN: 771618      FCDL Date:	
11. Category of Service: Internal Connections	12. 470 Application Number: 107760000253995
13. SPIN: 143007197	14. Service Provider Name: Total Communications, Inc.
15. Contract Number: 98-08	16. Billing Account Number: 860-527-0742
17. Allowable Contract Date: 12/17/1999	18. Contract Award Date: 03/15/2000
19a. Service Start Date: 07/01/2002	19b. Service End Date:
20. Contract Expiration Date: 06/30/2003	
21. Attachment #: Y5-Wireless-TCI	22. Block 4 Entity Number: 122325
23a. Monthly Charges: \$.00	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$0.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges ( 23c x 23d): \$0.00	
23f. Annual non-recurring (one-time) charges: \$75,625.60	23g. Ineligible non-recurring amt.: \$.00
23h. Annual pre-discount amount for eligible non-recurring charges ( 23f - 23g): \$75,625.60	
23i. Total program year pre-discount amount ( 23e + 23h): \$75,625.60	
23j. % discount (from Block 4): 89	

**23k. Funding Commitment Request ( 23i x 23j): \$67,306.78**

**Block 6: Certifications and Signature**

**24a. Schools:**

**24b. Libraries or Library Consortia:**

**26a. Individual Technology Plan:**

**26b. Higher-Level Technology Plan(s):**

**26c. No Technology Plan Needed:**

**27a. Approved Technology Plan(s):**

**27b. State Approved Technology Plan:**

**27c. No Technology Plan Needed:**

**36. Printed Name of Authorized Person:**

**37. Title or Position of Authorized Person:**

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worksheets and other records used to compile these forms available to the auditor and/or the Administrator, and it should be able to demonstrate to the auditor and/or the Administrator how the entries in its application were provided.

### III. MINIMUM PROCESSING STANDARDS AND FILING REQUIREMENTS

#### Form 471 Minimum Processing Standards

When a Form 471 is received by the SLD, the form is first reviewed to make sure it complies with the following requirements before data entry begins. These minimum processing requirements are necessary in order to ensure the timely and efficient processing of properly completed applications. If a Form 471 fails to meet these requirements, the Form 471 will be rejected. The SLD may be prevented from returning the rejected Form 471 to the sender if the form lacks essential identifying information. If an applicant receives a returned Form 471, it is important that it resubmit the corrected form quickly. Once the corrected form is successfully data entered, the postmark date of that corrected form will be the postmark date for the purpose of the filing window deadline.

#### Manual Filers

1. **Correct Form:** Each Form 471 must be:

- a. the correct, OMB-approved FCC Form 471, with a date of October 2000 in the lower right-hand corner;
- b. submitted by regular mail, express delivery, or U.S. Postal Service Return Receipt Requested, or hand delivery. Forms may not be submitted by fax or e-mail. You are advised to keep proof of the date of mailing.

2. **Billed Entity Information:** In Block 1, each of the following items must be properly completed. The "Billed Entity" is the entity actually paying the bills for the services listed on the Form 471.

- a. Item (1) or (3) Either the Name of the Billed Entity or the Entity Number;
- b. Item (2) – Funding Year
- c. Item 6a – Contact Person Name

If any of these items is blank, and the information cannot be obtained from the page headers, the Form 471 will be rejected.

3. **Complete Submission of Form 471:** All 6 blocks of the Form 471 must be submitted. If any Block (1-6) is missing, the form will be rejected. Please note that Block 2, which indicates that this Form 471 is being filed to make a minor modification to a previously filed Form 471 will usually be left blank.

**Block 4 Worksheet:** At least one completed Block 4 Worksheet relevant to your application type (see Block 1, Item 5) must be submitted. If a relevant Block 4 Worksheet is not submitted, or the Worksheet is missing information, the form will be rejected.

**5. Complete Submission of Each Block 5 Funding Request:** Each Block 5 Funding Request must meet the following requirements in order to be data entered as part of the Form 471. If any of the requirements is missing, the Funding Request will be automatically deleted from the form. If all of the Block 5 Funding Requests fail to meet these requirements, the form will be rejected.

Each Block 5 Funding Request must, at a minimum, include:

- a. Item (11) – Category of Service;
- b. Item (13) or (14) – Either the Service Provider Identification Number or the Service Provider Name;
- c. Item (23) – At least one entry with a positive dollar value in Column E, H, I, or K must be completed. Please note that you may not increase your request after filing your Form 471, unless you submit a new Form 471. Therefore, you should take care to enter **ALL** applicable columns of Item (23).

In addition to the requirements listed above for Block 5, if certain components reflect a violation of program rules, they will invalidate the Funding Request featured for that service item. Discounts on services reflected in such Funding Requests will not even be entered into the SLD system; such a Funding Request will be automatically rejected, even while other Block 5 Funding Requests may be honored.

**6. Valid Certification:** Block 6, Item (34) Signature of authorized person must be completed. If Item (34) is left blank, the Form 471 will be rejected.

#### **Online Filers:**

When Blocks 1-5 of a Form 471 are submitted electronically, the applicant must also (1) submit the completed and signed Block 6 certification manually by mail, express delivery or U.S. Postal Service Return Receipt Requested or (2) submit the completed Block 6 certification online with a User ID and a PIN. If the Block 6 certification is submitted manually, you are advised to keep proof of the date of mailing. The Block 6 certification is reviewed to make sure it complies with the requirements listed in # 6 above. Reviewers also look for the Form 471 Application Number before the Certification and Signature Page is accepted and the Form 471 reaches “certified” status. If the Block 6 certification document lacks the information necessary to match your manually submitted certification with the electronically filed Blocks 1-5 of the form, then your application will not meet the application window filing requirements.

**Items (9)(b) and (9)(c)** - If your order includes high-bandwidth voice/data/video service provided by a telecommunications provider, please indicate in (9)(b) how many buildings had such service before your order and how many will have such service after your order. In (9)(c), indicate the highest speed of such service to a building before and after your order. If this service also provides your buildings with Internet access, please be sure to quantify that access by completing Item (9)(i).

**Item (9)(d) and (9)(e)** - If your order includes dial-up Internet access, please identify in (9)(d) the number of dial-up connections before and after your order. In (9)(e), indicate the highest speed of such connections before and after your order. If you complete this item, please also complete (9)(h)-(j).

**Item (9)(f) and (9)(g)** - If your order includes direct access to the Internet via lines identified in this application for Internet access only, please indicate in (9)(f) the number of such connections before and after your order. In (9)(g), indicate the highest speed of such connections before and after your order. If you complete this item, please also complete (9)(h)-(j).

**Item (9)(h)** - If your application includes schools and provides for Internet access either directly or indirectly, please provide your very best estimate of the number of rooms with Internet access before and after your order. Please also complete (9)(j).

**Item (9)(i)** - If your application includes libraries and provides for Internet access either directly or indirectly, please provide your very best estimate of the number of buildings (including bookmobiles) with Internet access before and after your order. Please also complete (9)(j).

**Item (9)(j)** - Provide your best estimate of the number of computers or other devices (such as television sets, hand-held units, network terminals, and other non-PC Internet appliances) that had Internet access before your order, and how many will have Internet access after your order. These devices may access the Internet directly or via a local area network. If you complete this item, be sure to also reflect the quality and capacity of that access by completing Items (9)(b) and (c), and/or (d) and (e), and/or (f) and (g).

**Item (9)(k)** - Use this item to describe any other relevant outcome of your order not captured in the items above. We are particularly interested in new and emerging technology solutions made possible by eligible services ordered in this application.

#### **E. Block 4: Discount Calculation Worksheets**

This block consists of three separate worksheets designed to meet the needs of those filing as:

- Schools/school districts – Worksheet A (see step-by-step instructions).
- Libraries (outlet/branch, system) – Worksheet B (see step-by-step instructions).
- Consortia – Worksheet C (see step-by-step instructions).

Each worksheet includes its own instructions and its own step-by-step discount calculation chart.