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Before the
FEDERAL COMMUNICATION COMMISSION
 Washington, D.C. 20554

In the Matter of)
)
 Request for Review by Colegio Nuestra)
 Senora Del Carmen) Form 471 Application No. 410828
 Decision of the Universal Service) & 410872
 Administrator)
 Schools and Libraries Universal Service) CC Docket No. 02-6
 Support Mechanism)

DOCKET FILE COPY ORIGINAL

TO: Wireline Competition Bureau

REQUEST FOR REVIEW

Pursuant to Sections 54.719(c) and 54.721 of the Federal Communications Commission ("Commission" or "FCC") rules, 47 C.F.R. §§ 54.719(c) and 54.721 (2003), Colegio Nuestra Senora del Carmen ("Colegio Del Carmen") hereby appeals the decision of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company to reduce the requested discount in Funding Year 2004 (07/01/2004 – 06/30/2005) from 80% to 20%.

I. BACKGROUND

On February 04, 2004, Colegio Del Carmen filed a FCC Forms 471 with the SLD indicating the services for which it was requesting discounts under the schools and libraries universal service support mechanism (the "E-rate program").¹ On Block 4 of its Form 471 applications, Colegio Del Carmen indicated that 500 out of 896 students enrolled during the 2004-2005 academic year qualified for a free or reduced price lunch under the National School Lunch Program ("NSLP") and requested an 80% discount on all of its funding requests.² During

¹ FCC Form 471 No. 410828 and 410872 for Colegio Nuestra Senora del Carmen (Exhibit A).
² The specific funding requests number are 1126524, 1126545, 1126551 and 1126644

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its review of Colegio Del Carmen's application, the SLD requested documentation supporting the eligible discount rate for the school.³ Specifically, the information request, which was delivered to Colegio Del Carmen, requested the following information:

1. The total number of enrolled.
2. Total number of surveys/applications sent out
3. Number of survey/application returned
4. Total number of students that qualifies for the National School Lunch Program, using the Income Eligibility Guidelines (IEG) of the NSLP, per returned surveys/applications
5. Are the surveys/applications and results kept on file.
6. Provide a sample copy of the FILLED OUT SURVEY/APPLICATION with the child's personal information crossed out for confidentiality.
7. A signed certification that reads: "I certify that only those students who meet the Income Eligibility of the National School Lunch Program have been included in Column 5 of item 10b, Block 4 (Worksheet A) of the Form 471."
8. The information must be in writing on the school letterhead and signed by a school official (such as the Principal, Vice – Principal Superintendent, Director of Food Services).

On December 16, 2004 Colegio Del Carmen provided the information requested to the SLD on the school letterhead and signed by the school Director, Carmen Diaz.⁴ In its response, Colegio Del Carmen indicated that there were 913 students enrolled, that 913 surveys/applications were sent out and that 913 surveys/applications were returned. It also indicates from those 913 survey/applications returned 587 students qualifies for the NSLP, that the surveys/applications and its results are kept on file and certified that only the students who meet the IEG of the NSLP had being included in Column 5 item 10b of block 4 (worksheet A) of the Form 471. Colegio Del Carmen also provided a sample copy of the socio-economic survey⁵.

³ See fax from Louis Batoff, Schools and Libraries Division, Program Integrity Assurance, to Lydia Hernandez, dated Noviembre 29, 2004 (Exhibit B).

⁴ See Letter from Colegio Del Carmen's Director, Carmen Diaz to Schools and Libraries Division, Program Integrity Assurance, dated December 02, 2004 (Exhibit C).

⁵ See ESTUDIO SOCIOECONOMICO (Exhibit D)

On April 05, 2005, the SLD issued a funding commitment decision letter reducing the discount rate from 80% to 20%.⁶ The SLD provided as explanation on the reason for the percentage reduction the following statement: **FRN approved; modified by SLD. The site-specific discount was corrected.**

It is our assumption that the SLD established the basis for the decision of awarding a 20% discount versus the 80% originally requested on the conflicting information provided by Colegio Del Carmen in the submitted SLD Form 471 and the response to the PIA request for information. (Exhibit A) **Colegio Del Carmen submitted in filing the SLD Form 471 with inaccurate information on Block 4 column 4 (896) and on Block 4 column 5 (500)**⁷. This number is not consistent with the information provided in the applicant response to the request of information **due to a change on the number of students enrolled after the form was filed and on the second study not all of the students complied with the survey.** (Exhibit D and Exhibit E) **Exhibit E provides the correct information (numbers) to calculate, following the FCC rules and procedures the exact number of students for Block 4, Column 4(913) and Column 5 (587). This change in numbers qualifies Colegio Del Carmen for an 80% percent of discount.**

The survey, which had been provided to the SLD during the PIA review process, asked parents to provide the size of the family, the number of students enrolled in the school, and the household income. Out of the 913 surveys distributed, 913 of the students completed the survey. From the 913 completed surveys, 587 (64.29 %) were determined to be eligible for a free or reduced price lunch under the NSLP in accordance with the Income Eligibility Guidelines of the

⁶ See Letter from Schools and Libraries Division, Universal Service Administrative Company to Colegio Del Carmen, dated April 05, 2005 (Exhibit E)

⁷ Exhibit A

U.S. Department of Agriculture. Following the SLD's guidelines we can get to the conclusion that in Colegio Del Carmen students, or 64.29 % of its student population, qualified for a free or reduced-price lunch under the NSLP. Using the discount matrix set forth in the FCC rules, a school with 64.29 % of its student population eligible for the national school lunch program qualifies for 80% discount under the schools and libraries universal service support mechanism.

II. COLEGIO DEL CARMEN CORRECTLY DETERMINED THE PERCENTAGE OF STUDENTS ELIGIBLE FOR A FREE OR REDUCED-PRICE LUNCH UNDER THE NSLP.

Although Colegio Del Carmen erroneously filed an SLD Form 471 with inaccurate information on Block 4, alternately, when requested submitted sufficient evidence to the PIA to demonstrate the percentage of students eligible for a free or reduced – price lunch under the NSLP. (80%)

Under the Commission's rules, the discount available to a particular school is determined by indicators of poverty and high relative cost of service.⁸ First, the level of poverty for schools is measured by the percentage of their student enrollment that is eligible for a free or reduced-price lunch under the NSLP or a federally-approved alternative mechanism outlined in Title I of the Improving America's School Act (IASA).⁹ These federally-approved alternative mechanisms include data comparable to the NSLP data that is collected through surveys. As the Commission has acknowledged, surveys are particularly relevant to schools that many not have access to NSLP data, such as private schools.¹⁰ Second, a school's high-cost status is derived

⁸ 47 C.F.R. § 54.505(b).

⁹ 47 C.F.R. § 54.505(b)(1); *Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, FCC 97-157, 12 FCC Rcd 8776, ¶¶ 508-09 (rel. May 8, 1997).

¹⁰ See *School for Language and Communication Development*, Order, 17 FCC Rcd 15166 (rel. Aug. 6, 2002).

from rules that classify it as urban or rural.¹¹ The Commission's rules provide a matrix reflecting both the school's urban or rural status and the percentage of its students who are eligible for the school lunch program to establish its discount rate, ranging from 20 percent to 90 percent.¹²

Because NSLP data is unavailable for Colegio Del Carmen, it used a federally-approved alternative mechanism that relies on actual counts of low-income children to determine the level of poverty.

III. THE SLD ERRONEOUSLY CONCLUDED THAT COLEGIO DEL CARMEN QUALIFIED FOR A 20% DISCOUNT AND FAILED IN NOT REQUESTING ADDITIONAL INFORMATION TO THE SCHOOL AND CLARIFY THE CONFLICTING INFORMATION.

Colegio Del Carmen submitted to the SLD exactly what it was asked to submit: (a) the total number of students (913 students), (b) the number of surveys/applications sent out (913), (c) the number of surveys/applications returned (913) (d) the number of students qualified to participate in the NSLP, 587 (based on the SLD projection guidelines), (e) if the survey/applications were kept on file, yes, (f) and (g) certification that only students that meet the IEG of the NSLP have been included in Column 5, item 10b of block 4 (worksheet A) of the Form 471. In addition, Colegio Del Carmen provided a sample copy of the socio-economic survey conducted by the school. No additional documentation supporting the eligible discount rate for the school was requested.

IV. CONCLUSION

Colegio Del Carmen provided clear evidence to the SLD that it qualified for an 80% discount under the E-rate program since out of 587 students (64.29% of the student population)

¹¹ 47 C.F.R. §§ 54.505(b)(3)(i), (ii).

¹² 47 C.F.R. § 54.505(c).

were eligible for a free or reduced price lunch under the NSLP. This data was collected through a survey that was conducted in accordance with the SLD's guidelines. Furthermore, the school provided the SLD with all the information that was requested during the application review process. Therefore, the SLD erred in its decision to reduce the discount rate from the requested 80% to 20% and in not granting an 80% discount to Colegio Del Carmen. Colegio Del Carmen respectfully requests that the Commission reverse the SLD's reduction on percentage discount requested and grant its application to be funded at an 80% discount.

Respectfully submitted,

**COLEGIO NUESTRA SENORA DEL
CARMEN**



Carmen Diaz
Director, Colegio Nuestra Senora del
Carmen
PO Box 937
Hatillo, PR 00986
Tel: 787-898-2800
Fax: 787-820-5258

May 24, 2005

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

Block 1: Billed Entity Information

Exhibit A

Applicant's Form Identifier: DEL CARMEN
HATILLO 04

471 Application Number: 410828

Cert. Postmark Date: 02/04/2004

Out of Window Letter Date: Not applicable

Funding Year: 07/01/2004 -
06/30/2005

Form Status: CERTIFIED - In
Window

Billed Entity Number:
158961

RAL Date: 03/08/2004

Name: COLEGIO NUESTRA SENORA DEL CARMEN
Address: CARRETERA 119, AVE. DR. SUSONI 168 Y CALLE CARMELO
City: ARECIBO **State:** PR **Zip:** 00659

Contact Name: LYDIA HERNANDEZ
Address: 206 CALLE DR SALAS
City: ARECIBO **State:** PR **Zip:** 00612

Type of Application: SCHOOL

Ineligible Orgs: N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 896

Number of library patrons to be served:

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
a. (Schools/districts/consortia only) Telephone service: How many classrooms had phone service before and after your order?	3	3
b. High-bandwidth voice/data/video service: How many buildings served before and after your order?	2	4
c. High-bandwidth voice/data/video service: Highest speed to a building before and after your order?	1544	512
d. Dial-up Internet connections: How many before and after your order?	1	1
e. Dial-up Internet connections: Highest speed before and after your order?	56	56
f. Direct connections to the Internet: How many before and after your order?	1	1
g. Direct connections to the Internet: Highest speed before and after your order?	1544	512
h. Internet access(for schools): How many rooms have Internet access before and after your order?	3	32
j. Internet Access: How many computers (or other devices) with Internet access before and after your order?	75	90

Block 4: Worksheets

Worksheet A No: 566753 Student Count: 896
 Weighted Product (Sum. Column 8): 716.8 Shared Discount: N/A

1. School Name: COLEGIO NUESTRA SENORA DEL CARMEN
 2. Entity Number: 158961 3. Rural/Urban: Urban
 4. Student Count: 896 5. NSLP Students: 500 6. NSLP Students/Students: 55.803%
 7. Discount: 80% 8. Weighted Product: 716.8

Block 5: Discount Funding Request(s)

FRN: 1126524 FCDL Date:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 377780000473020
13. SPIN: 143012431	14. Service Provider Name: Puerto Rico Telephone Company, Inc.
15. Contract Number: T	16. Billing Account Number: 787-898-2800
17. Allowable Contract Date: 12/23/2003	18. Contract Award Date:
19a. Service Start Date: 07/01/2004	19b. Service End Date: 06/30/2005
20. Contract Expiration Date:	
21. Attachment #: 1	22. Block 4 Entity Number: 158961
23a. Monthly Charges: \$374.00	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$374.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$4,488.00	
23f. Annual non-recurring (one-time) charges: \$0.00	23g. Ineligible non-recurring amt.: \$0.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$4,488.00	
23j. % discount (from Block 4): 80	
23k. Funding Commitment Request (23i x 23j): \$3,590.40	

FRN: 1126545 FCDL Date:	
11. Category of Service: Internet Access	12. 470 Application Number: 377780000473020
13. SPIN: 143022659	14. Service Provider Name: A New Vision in Educational Services and Materials (NEVESEM)
15. Contract Number: MTM	16. Billing Account Number: NUE03001
17. Allowable Contract Date: 12/23/2003	18. Contract Award Date:

19a. Service Start Date: 07/01/2004		19b. Service End Date: 06/30/2005	
20. Contract Expiration Date:			
21. Attachment #: 2		22. Block 4 Entity Number: 158961	
23a. Monthly Charges: \$1,485.00		23b. Ineligible monthly amt.: \$0.00	
23c. Eligible monthly amt.: \$1,485.00		23d. Number of months of service: 12	
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$17,820.00			
23f. Annual non-recurring (one-time) charges: \$7,621.00		23g. Ineligible non-recurring amt.: \$0.00	
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$7,621.00			
23i. Total program year pre-discount amount (23e + 23h): \$25,441.00			
23j. % discount (from Block 4): 80			
23k. Funding Commitment Request (23i x 23j): \$20,352.80			

FRN: 1126551		FCDL Date:	
11. Category of Service: Internet Access		12. 470 Application Number: 377780000473020	
13. SPIN: 143022659		14. Service Provider Name: A New Vision in Educational Services and Materials (NEVESEM)	
15. Contract Number: MTM		16. Billing Account Number: NUE03001	
17. Allowable Contract Date: 12/23/2003		18. Contract Award Date:	
19a. Service Start Date: 07/01/2004		19b. Service End Date: 06/30/2005	
20. Contract Expiration Date:			
21. Attachment #: 2		22. Block 4 Entity Number: 158961	
23a. Monthly Charges: \$207.00		23b. Ineligible monthly amt.: \$0.00	
23c. Eligible monthly amt.: \$207.00		23d. Number of months of service: 12	
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$2,484.00			
23f. Annual non-recurring (one-time) charges: \$0.00		23g. Ineligible non-recurring amt.: \$0.00	
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00			
23i. Total program year pre-discount amount (23e + 23h): \$2,484.00			
23j. % discount (from Block 4): 80			
23k. Funding Commitment Request (23i x 23j): \$1,987.20			

Block 6: Certifications and Signature

- 24a. Schools: Y**
24b. Libraries or Library Consortia: N
26a. Individual Technology Plan: N
26b. Higher-Level Technology Plan(s): Y
26c. No Technology Plan Needed:
27a. Approved Technology Plan(s): N
27b. State Approved Technology Plan: Y
27c. No Technology Plan Needed:

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

Exhibit A

Block 1: Billed Entity Information

Applicant's Form Identifier: DEL CARMEN
 HATILLO 04-2

471 Application Number: 410872

Cert. Postmark Date: 02/04/2004

Out of Window Letter Date: Not applicable

Funding Year: 07/01/2004 -
 06/30/2005

Form Status: CERTIFIED - In
 Window

Billed Entity Number:
 158961

RAL Date: 03/08/2004

Name: COLEGIO NUESTRA SENORA DEL CARMEN
Address: CARRETERA 119, AVE. DR. SUSONI 168 Y CALLE CARMELO
City: ARECIBO **State:** PR **Zip:** 00659

Contact Name: LYDIA HERNANDEZ
Address: 206 CALLE DR SALAS
City: ARECIBO **State:** PR **Zip:** 00612

Type of Application: SCHOOL

Ineligible Orgs: N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 896

Number of library patrons to be served:

SERVICE DESCRIPTION	BEFORE ORDER	AFTER ORDER
a. (Schools/districts/consortia only) Telephone service: How many classrooms had phone service before and after your order?	3	3
b. High-bandwidth voice/data/video service: How many buildings served before and after your order?	2	4
c. High-bandwidth voice/data/video service: Highest speed to a building before and after your order?	1544	512
d. Dial-up Internet connections: How many before and after your order?	1	1
e. Dial-up Internet connections: Highest speed before and after your order?	56	56
f. Direct connections to the Internet: How many before and after your order?	1	1
g. Direct connections to the Internet: Highest speed before and after your order?	1544	512
h. Internet access(for schools): How many rooms have Internet access before and after your order?	3	32
j. Internet Access: How many computers (or other devices) with Internet access before and after your order?	75	90

Block 4: Worksheets

Worksheet A No: 567061 Student Count: 896
 Weighted Product (Sum. Column 8): 716.8 Shared Discount: N/A

1. School Name: COLEGIO NUESTRA SENORA DEL CARMEN
 2. Entity Number: 158961 3. Rural/Urban: Urban
 4. Student Count: 896 5. NSLP Students: 500 6. NSLP Students/Students: 55.803%
 7. Discount: 80% 8. Weighted Product: 716.8

Block 5: Discount Funding Request(s)

FRN: 1126644 FCDL Date:	
11. Category of Service: Internal Connections	12. 470 Application Number: 377780000473020
13. SPIN: 143022659	14. Service Provider Name: A New Vision in Educational Services and Materials (NEVESEM)
15. Contract Number: ONE TIME	16. Billing Account Number: NUE03001
17. Allowable Contract Date: 12/23/2003	18. Contract Award Date: 01/21/2004
19a. Service Start Date: 07/01/2004	19b. Service End Date:
20. Contract Expiration Date: 09/30/2005	
21. Attachment #: 3	22. Block 4 Entity Number: 158961
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: \$39,669.00	23g. Ineligible non-recurring amt.: \$.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$39,669.00	
23i. Total program year pre-discount amount (23e + 23h): \$39,669.00	
23j. % discount (from Block 4): 80	
23k. Funding Commitment Request (23i x 23j): \$31,735.20	

FRN: 1126647 FCDL Date:	
11. Category of Service: Internal Connections	12. 470 Application Number: 377780000473020
13. SPIN: 143022659	14. Service Provider Name: A New Vision in Educational Services and Materials (NEVESEM)
15. Contract Number: ONE TIME	16. Billing Account Number: NUE03001
17. Allowable Contract Date: 12/23/2003	18. Contract Award Date: 01/21/2004
19a. Service Start Date: 07/01/2004	19b. Service End Date:

20. Contract Expiration Date: 09/30/2005	
21. Attachment #: 3	22. Block 4 Entity Number: 158961
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: \$2,040.00	23g. Ineligible non-recurring amt.: \$.00
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$2,040.00	
23i. Total program year pre-discount amount (23e + 23h): \$2,040.00	
23j. % discount (from Block 4): 80	
23k. Funding Commitment Request (23i x 23j): \$1,632.00	

Block 6: Certifications and Signature

24a. Schools: Y

24b. Libraries or Library Consortia: N

26a. Individual Technology Plan: N

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

26c. No Technology Plan Needed:

27a. Approved Technology Plan(s): N

27b. State Approved Technology Plan: Y

27c. No Technology Plan Needed:

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Universal Service Administrative Company
Schools & Libraries Division

Date: November 29, 2004

Dear Lydia Hernandez
COLEGIO NUESTRA SENORA DEL CARMEN
(787) 878-1095
Application Number #410828

Exhibit B

The Program Integrity Assurance (PIA) team is in the process of reviewing all Form 471 Applications for schools and libraries discounts to ensure that they are in compliance with the rules of the federal universal service program. We are currently in the process of reviewing your Funding Year 2004 Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

- 1.) Based upon review of your Form 471 application, we were not able to validate your requested discount percentage of 80% for COLEGIO NUESTRA SENORA DEL CARMEN. If you choose to validate your original requested discount percentage of 80%, then please provide the appropriate documentation if one of the following acceptable methods were used:
 - a. If the school participates in a National School Lunch Program (NSLP), please provide us a signed copy (preferably by the Principal, Vice-Principal, Superintendent, or Director of Food Services) of the Reimbursement Claim Form that the school sends to the state each month. Make sure that the following 3 items are identified:
 - 1) The Entity name
 - 2) The total number of students enrolled at the entity
 - 3) The total number of students eligible for Free/Reduced Lunch Program for the entity

If the school district fills out an aggregate form for the school district, provide a signed letter from a school official (preferably the Superintendent) that lists the Free/Reduced information for each school in the district.

- b. If the discount percentage was determined by information obtained from a survey/application, please provide the following information:
 - 1) Total number of students enrolled
 - 2) Total number of surveys/applications sent out
 - 3) Number of surveys/applications returned
 - 4) Total number of students qualified for NSLP per the returned surveys/applications
 - 5) Are the surveys/applications and results kept on file.
 - 6) Provide a sample copy of a FILLED OUT SURVEY/APPLICATION with the child's personal information crossed out for confidentiality.
 - 7) A signed certification that reads: "I certify that only those students who

meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 10b, of Block 4 (Worksheet A) of the Form 471."

8) This information must be in writing on school letterhead and signed by a school official (such as the Principal, Vice-Principal, Superintendent, Director of Food Services).

c. If the discount was determined using a different method than what was identified above, please indicate the method that was used and provide all relevant data.

In addition, concerning your funding request for FRN1126545 for application number 410828 under the Schools & Libraries Support Mechanism ("E-rate"), your request might contain some products that are eligible for funding, or not eligible for funding, depending on how they are used. We will need some additional information in order to evaluate your funding request. Please submit the information requested below.

In general, E-rate funds are available to provide connectivity. Other uses are not eligible for support. The products/services being requested may have some ineligible functions including but not limited to: Content filtering, network management, proxy services, caching, and Virtual Private Networks (VPN's). In order for us to further evaluate your request, please refer to the areas below and indicate the statements that apply to you. Do you plan to use any ineligible functions as part of your request for Products or Services?

Yes No

If no, please sign and date the following statement:

I certify that we will not utilize the ineligible functions contained within the requested product or service and that we may be audited. If we are found to have used these products/services in a way that is prohibited, recovery of funds or revocation of funding commitments is a possibility.

Signature: _____ Date: _____

If yes, the ineligible function must be cost allocated out of the funding request. The full SLD administrative policy for such products and services is provided in "Cost Allocation Guidelines for Products and Services that Contain Eligible and Ineligible Components," <http://www.sl.universalservice.org/reference/costallocationguide.asp>.

Please provide a cost allocation of the ineligible functions (to include all related costs such as installation, maintenance, taxes, etc). In general, the method of cost allocation must be based on tangible criteria and provide a realistic result. Please describe the approach used for the cost allocation.

The amount to be allocated out of the request is _____ for the following ineligible

Name: _____

Title: _____

Date: _____

Thank you for your participation in the E-rate program.

Please fax or e-mail the requested information to my attention. If you have any questions, please feel free to contact me.

It is important that we receive all of the information requested so we can complete our review. **Failure to do so may result in a reduction or denial of funding.**

Please send the requested information within seven calendar days. If you need additional time to prepare your response, please let me know as soon as possible.

Thank you for cooperation and continued support of the Universal Service Program.

Sincerely,

Louis Batoff
Schools And Libraries Division
Program Integrity Assurance
Phone: 973- 560-4414
FAX: 973- 599-6522
USAC:lbatoft@sl.universalservice.org



80 South Jefferson Road
Whippany, New Jersey 07981
Fax: 973-599-6522

Universal Service Administrative Company
Schools & Libraries

FAX TRANSMISSION COVER SHEET

To: LydiaHernandez
Fax: 17878781095
Subject: APP#410828 ADD'L DOCUMENTATION REQUESTED.
From: PIATeam1
Date: November 29, 2004
Time: 9:30:13 AM

YOU SHOULD RECEIVE 5 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL THE CONTACT SPECIFIED BELOW.

Dear Lydia Hernandez:

Hope you had a nice Thanksgiving.

Thank you for your response concerning the CISCO ROUTER 1760V. I have enclosed a letter requesting additional information. In addition, please see the section regarding documentation required to validate your discount.

Please review the attached letter, and please give me a call if you have any questions.

Please send the requested information within seven calendar days.

Privilege and Confidentiality Notice

The information in this telecopy is intended for the named recipients only. It may contain information that is privileged, confidential or otherwise protected from disclosure. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action in reliance on the contents of this telecopied material is strictly prohibited. If you have received the telecopy in error, please notify us by telephone immediately and mail the original to us at the above address. Thank you

COLEGIO NUESTRA SEÑORA DEL CARMEN

Acreditado por: Departamento de Educación de P.R.
Middle States Association
of Colleges and Schools

P.O. Box 937, Hatillo, Puerto Rico 00659
Tels. 898-2800 / 5235 • Fax 820-5258
Web page - <http://netdial.caribe.net/~cncs>
E-mail: cncs@caribe.net

To: Louis Battof
PIA Reviewer

Fax: 973-599-6522

From: Carmen Diaz
Director
Colegio Nuestra Señora del Carmen

Exhibit C

Date: December 2, 2004

Subject: Application Numbers 410828

The discount percentage was determined by information obtained from a survey/application method. Results were as follow:

Total number of students enrolled – 913

Total number of surveys/applications sent out – 913

Number of surveys/applications returned – 913

Total number of students qualified for NSLP per the returned surveys/applications – 587

Are the surveys/applications and results kept on file – Yes

Copy of a FILLED OUT SURVEY/APPLICATION – annex 1

Signed certification – annex 2

COLEGIO NUESTRA SEÑORA DEL CARMEN

Acreditado por: Departamento de Educación de P.R.
Middle States Association
of Colleges and Schools

P.O. Box 937, Hatillo, Puerto Rico 00659
Tels. 898-2800 / 5235 ♦ Fax 820-5258
Web page - <http://netdial.caribe.net/~cncs>
E-mail: cncs@caribe.net

Annex 2

Certification

"I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in column 5 of Item 10b, of Block 4 (worksheet A) of the Form 471."


Carmen Díaz
Director
Colegio Nuestra Señora del Carmen

December 2, 104
Date

Dear Applicant:

Concerning your funding request for FRN 1126545 for application number 410828 under the Schools & Libraries Support Mechanism (" E-Rate"), your request might contain some products that are eligible for funding, or not eligible for funding, depending on how they are used. We will need some additional information in order to evaluate your funding request. Please submit the information requested below.

To aid in your response, you may wish to consult our Eligible Services List, which is available at www.sl.universalservice.org. You may also wish to check with your service provider if you are uncertain about making the certifications on this page.

In general, E-rate funds are available to provide connectivity. Other uses are not eligible for support. The products/services being requested may have some ineligible functions including but not limited to content filtering, network management, proxy services, caching, and Virtual Private Network (VPN's). In order for us to further evaluate your request, please refer to the areas below and indicate the statements that apply to you.

Do you plan to use any ineligible functions as part of your request for Products or Services?

Yes _____ No X

If no, please sign and date the following statement:

I certify that we will not utilize the ineligible functions contained within the requested product or services and those we may be audited. If we are found to have used these products/services in a way that is prohibited, recovery of funds or revocation of funding commitments is a possibility.

Signature: Andrew R. King Date: December 2, 04

If yes, the ineligible function must be cost allocated out to the funding request. The full SLD administrative policy for such products and services is provided in " Cost Allocation Guidelines for Products and Services that Contain Eligible and Ineligible Components". <http://www.sl.universalservice.org/reference/costallocationguide.asp>.

Please provide a cost allocation of the ineligible functions (to include all related costs such as installation, maintenance, taxes, etc.).

In general, the method of cost allocation must be based on tangible criteria and provide a realistic result. Please describe the approach used for the cost allocation.

The amount to be allocated out of the request is _____ for the following
ineligibles _____

Name _____
Title _____
Date _____

Thank you for your participation in the E-rate program

USAC**Universal Service Administrative Company**

Schools & Libraries Division

FUNDING COMMITMENT DECISION LETTER

(Funding Year 2004: 07/01/2004 - 06/30/2005)

April 5, 2005

LYDIA HERNANDEZ
COLEGIO NUESTRA SENORA DEL CARMEN
206 CALLE DR SALAS
ARECIBO, PR 00612

Exhibit E

Re: Form 471 Application Number: 410872
Funding Year 2004: 07/01/2004 - 06/30/2005
Billed Entity Number: 158961
Applicant's Form Identifier: DEL CARMEN HATILLO 04-2

Thank you for your Funding Year 2004 E-rate application and for any assistance you provided throughout our review. Here is the current status of the funding request(s) featured in the Funding Commitment Report at the end of this letter.

- The amount, \$8,341.80 is "As Yet Unfunded."

Please refer to the Funding Commitment Report on the page following this letter for specific funding request decisions and explanations.

The Important Reminders and Deadlines immediately preceding this letter are provided to assist you throughout the application process.

NEXT STEPS

- Review technology planning approval requirements
- Review CIPA Requirements
- File Form 486
- Invoice the SLD using the Form 474 (service providers) or Form 472 (Billed Entity)

FUNDING COMMITMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Report for the Form 471 application cited above. The enclosed report includes a list of the Funding Request Number(s) (FRNs) from your application. The SLD is also sending this information to your service provider(s) so preparations can be made to begin implementing your E-rate discount(s) after you file your Form 486. Immediately preceding the Funding Commitment Report, you will find a guide that provides a definition for each line of the Report.

TO APPEAL THIS DECISION:

If you wish to appeal the decision indicated in this letter, your appeal must be received by the SLD or postmarked withing 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Funding Commitment Decision(s) you are appealing. Indicate the relevant funding year and the date of the FCDL. Your letter of appeal must also include the Billed Entity Name, the

Form 471 Application Number, and the Billed Entity Number from the top of your letter.

3. When explaining your appeal, copy the language or text from the Funding Commitment Report that is at the heart of your appeal, to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal on paper, please send your appeal to: Letter of Appeal, Schools and Libraries Division, Box 125 - Correspondence Unit, 80 South Jefferson Road, Whippany, NJ 07981. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We encourage the use of either the e-mail or fax filing options.

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, sent to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and 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 or by contacting the Client Service Bureau. We strongly recommend that you use either the e-mail or fax filing options.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Universal Service Support Mechanism. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. The SLD may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by the SLD, the applicant, or the service provider. The SLD, and other appropriate authorities (including but not limited to USAC and the FCC), may pursue enforcement actions and other means of recourse to collect erroneously disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company

FUNDING COMMITMENT REPORT

Form 471 Application Number: 410872
Funding Request Number: 1126644 Funding Status: As Yet Unfunded
Services Ordered: Internal Connections
SPIN: 143022659 Service Provider Name: A New Vision in Educational Ser
Contract Number: ONE TIME
Billing Account Number: NUE03001
Service Start Date: 07/01/2004
Contract Expiration Date: 09/30/2005
Site Identifier: 158961
Annual Pre-discount Amount for Eligible Recurring Charges:
Annual Pre-discount Amount for Eligible Non-recurring Charges:
Pre-discount Amount:
Discount Percentage Approved by the SLD:
Funding Commitment Decision:

Funding Request Number: 1126647 Funding Status: As Yet Unfunded
Services Ordered: Internal Connections
SPIN: 143022659 Service Provider Name: A New Vision in Educational Ser
Contract Number: ONE TIME
Billing Account Number: NUE03001
Service Start Date: 07/01/2004
Contract Expiration Date: 09/30/2005
Site Identifier: 158961
Annual Pre-discount Amount for Eligible Recurring Charges:
Annual Pre-discount Amount for Eligible Non-recurring Charges:
Pre-discount Amount:
Discount Percentage Approved by the SLD:
Funding Commitment Decision:



FUNDING COMMITMENT DECISION LETTER

(Funding Year 2004: 07/01/2004 - 06/30/2005)

April 5, 2005

LYDIA HERNANDEZ
COLEGIO NUESTRA SENORA DEL CARMEN
206 CALLE DR SALAS
ARECIBO, PR 00612

Re: Form 471 Application Number: 410828
Funding Year 2004: 07/01/2004 - 06/30/2005
Billed Entity Number: 158961
Applicant's Form Identifier: DEL CARMEN HATILLO 04

Thank you for your Funding Year 2004 E-rate application and for any assistance you provided throughout our review. Here is the current status of the funding request(s) featured in the Funding Commitment Report at the end of this letter.

- The amount, \$5,585.00 is "Approved."
- The amount, \$897.60 is "Denied."

Please refer to the Funding Commitment Report on the page following this letter for specific funding request decisions and explanations.

The Important Reminders and Deadlines immediately preceding this letter are provided to assist you throughout the application process.

NEXT STEPS

- Review technology planning approval requirements
- Review CIPA Requirements
- File Form 486
- Invoice the SLD using the Form 474 (service providers) or Form 472 (Billed Entity)

FUNDING COMMITMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Report for the Form 471 application cited above. The enclosed report includes a list of the Funding Request Number(s) (FRNs) from your application. The SLD is also sending this information to your service provider(s) so preparations can be made to begin implementing your E-rate discount(s) after you file your Form 486. Immediately preceding the Funding Commitment Report, you will find a guide that provides a definition for each line of the Report.

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1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Funding Commitment Decision(s) you are appealing. Indicate the relevant funding year and the date

of the FCDL. Your letter of appeal must also include the billed entity name, the Form 471 Application Number, and the Billed Entity Number from the top of your letter.

3. When explaining your appeal, copy the language or text from the Funding Commitment Report that is at the heart of your appeal, to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

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Schools and Libraries Division
Universal Service Administrative Company

of the FCDL. Your letter of appeal must also include the Billed Entity Name, the Form 471 Application Number, and the Billed Entity Number from the top of your letter.

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Schools and Libraries Division
Universal Service Administrative Company

FUNDING COMMITMENT REPORT

Form 471 Application Number: 410828
Funding Request Number: 1126524 Funding Status: Not Funded
Services Ordered: Telecommunications Service
SPIN: 143012431 Service Provider Name: Puerto Rico Telephone Company,
Contract Number: T
Billing Account Number: 787-898-2800
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 158961
Annual Pre-discount Amount for Eligible Recurring Charges: \$4,488.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$4,488.00
Discount Percentage Approved by the SLD: N/A
Funding Commitment Decision: \$0.00 - Incl. svcs./ or product(s)
Funding Commitment Decision Explanation: 30% or more of this FRN includes a request
for cargos directorio, a phone, late charges and one time installation charges which
are ineligible products/services based on program rules.

Funding Request Number: 1126545 Funding Status: Funded
Services Ordered: Internet Access
SPIN: 143022659 Service Provider Name: A New Vision in Educational Ser
Contract Number: MTM
Billing Account Number: NUE03001
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 158961
Annual Pre-discount Amount for Eligible Recurring Charges: \$17,820.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$7,621.00
Pre-discount Amount: \$25,441.00
Discount Percentage Approved by the SLD: 20%
Funding Commitment Decision: \$5,088.20 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The site-specific discount was corrected.

Funding Request Number: 1126551 Funding Status: Funded
Services Ordered: Internet Access
SPIN: 143022659 Service Provider Name: A New Vision in Educational Ser
Contract Number: MTM
Billing Account Number: NUE03001
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 158961
Annual Pre-discount Amount for Eligible Recurring Charges: \$2,484.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$2,484.00
Discount Percentage Approved by the SLD: 20%
Funding Commitment Decision: \$496.80 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The site-specific discount was corrected.