

## **FCC REQUEST FOR REVIEW (APPEAL) TRANSMITTAL FORM**

**DATE:** October 12, 2006

**FROM:** CHARLESTON AREA CONSTRUCTION  
CHARTER SCHOOL  
3231 MAYBANK HWY  
JOHNS ISLAND, SC 29455  
ATTN: MS. RENEE CHEWNING  
ENTITY NUMBER: 16021503

**TO:** Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

**VIA:** Electronic Comment File Submission

**CC DOCKET NUMBERS:** 02-6  
96-45

**DIRECT CORRESPONDENCE TO:** Chris A. Quintanilla  
Youth Empowerment Services  
1231 N Broad St., FL 4  
Philadelphia, PA 19122-4021  
215/769-0340 X226 (voice)  
215/769-2784 (facsimile)  
chrisqu@yesphilly.org (email)

**RE:** REQUEST FOR REVIEW:  
SLD FUNDING COMMITMENT  
DECISIONS FOR FUNDING YEAR 2005-2006  
FORM 471 APPLICATION NUMBER: 473546;  
FUNDING REQUEST NUMBER: 1305285

**PAGES (INCL COVER):** 18

October 12, 2006

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

**RE: REQUEST FOR REVIEW FOR FUNDING YEAR 2005 APPLICATION 473546**

To the Honorable Members of the Commission:

We submit this appeal for the captioned e-rate funding applications and respectfully request you remand this application back to the Universal Service Administrative Company's Schools and Libraries Division for further review.

The Charleston Area Construction Charter School, billed entity 16021503, is a school located near Charleston, South Carolina that serves disadvantaged young people, as part of the YouthBuild USA network (<http://www.youthbuild.org>).

Youth Empowerment Services (YES) is a non-profit organization located in Philadelphia, Pennsylvania that also serves disadvantaged young people and provides technical assistance to other organizations with similar interests.

The school retained YES to be its e-rate program consultant in FY 2005. YES assisted the school with the application process and the school submitted three applications (473386, 473506, 473546) for discounts through the Universal Service Support Mechanism for Schools and Libraries (the e-rate program) in FY 2005. These applications were filed in a timely manner with the Universal Service Administrative Company's (USAC's) Schools and Libraries Division (SLD). SLD's Program Integrity Assurance (PIA) group subjected application 473546 to a Cost Effectiveness Review in January, 2006. YES responded to the Cost Effectiveness Review Request, in a timely fashion, on February 1<sup>st</sup>, 2006, on behalf of the school. On or about February 15<sup>th</sup>, 2006, USAC issued a Funding Commitment Decision Letter (FCDL) denying the submitted application. The reason stated in the FCDL for the application denial was: "This funding request is denied as a result of a Cost Effectiveness Review, which has determined that your request for Network Equipment and Cabling was not justified as cost effective as required by FCC rules."

On April 7<sup>th</sup>, 2006, YES, on behalf of the school, filed a timely appeal with USAC, requesting that the funding commitment denials for each of the applications be reversed. That appeal is attached to this submission as Exhibit A. We raised eight grounds for appeal:

- 1) There was no publicly available data showing any policy or guidance given by the Commission that supports the apparent guidelines used by PIA in its cost-effectiveness review

- 2) SLD did not give our cost-effectiveness review response due consideration, as none of our points were addressed in any follow-up correspondence or in the denial letter
- 3) The cost-effectiveness review incorrectly drew a correlation between the number of students to be served and the dollar amount of the funding request.
- 4) The cost-effectiveness review did not take non-student users (e.g. teachers, administrators, etc...) into account when calculating its figures.
- 5) The cost-effectiveness review erroneously made a direct link between maintenance expense and the number of students supported.
- 6) The cost-effectiveness review did not take life expectancy of the equipment into account when performing its calculations – it erroneously assumed only a one-year usage for the equipment
- 7) SLD erred by going against the public interest by penalizing smaller schools, and especially those smaller schools with disadvantaged populations
- 8) SLD did not follow the Commission’s policy set forth in the matter of the Wyoming Department of Education (DA-06-485A1), available Feb 28<sup>th</sup>, 2006, which stated “Although the Commission has concluded that price should be the primary factor in selecting a bid, applicants are given maximum flexibility to take service quality into account and may choose the offering that meets their needs most effectively and efficiently.”

On August 15<sup>th</sup>, 2006, SLD denied the appeal for the application. Their letters is attached to this submission as Exhibit B.

As a result of this denial, which we believe to be incorrect, we are appealing this decision directly to the Commission. As part of this appeal, we would respectfully raise the following four points that we ask to be taken into consideration:

- 1) SLD did not respond to our appeal

In its denial of our appeal, SLD did not address any of the eight grounds we cited. We would respectfully attach the grounds raised in both that appeal, and in our original response to the cost-effectiveness review, to this request for review.

- 2) SLD’s cost-effectiveness review is against the public interest

The FCC’s Fifth report and order repeatedly states, “All bids submitted were carefully considered and the most cost-effective bid for services or equipment was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology plan goals,” and requires that this statement be certified on FCC Forms 470 and 471.

However, cost-effectiveness decisions should be up to the applicant and not be made by SLD on a case-by-case basis, using guidelines that are not publicly available. While the educational needs of all students is similar, smaller schools serving disadvantaged populations will be unfairly harmed by making a correlation between technology dollars and the number of students it served.

3) SLD overstepped its authority in implementing the cost-effectiveness review

The school's technology plan takes cost-effectiveness into account. When the technology plan is approved by a USAC-certified reviewer, it is implied that the technology plan is cost-effective. SLD undermines that approval by unnecessarily subjecting elements of a plan, approved by one of its approval authorities, to additional scrutiny.

Additionally, the Commission's decision to have applicants certify that an application is cost-effective puts the onus on the applicant to make that determination. That determination is made by an individual school based on the resources it has available, and should not be made by a third party that has its own, non-public, cost-effectiveness guidelines.

Additionally, the Ysleta order does not apply to this situation: a) By applying the test set forth in paragraph 54 of that order, it is our contention that the prices set forth by sole proposal, were not exorbitant, nor did SLD claim they were exorbitant; b) the school did not violate competitive bidding practices and it selected the most cost-effective bid that it received; and c) the application is not a maintenance request.

4) SLD's "all or nothing" approach is against the public interest

Instead of denying the entire request, SLD could have denied certain line items it deemed to be ineligible because of cost-effectiveness concerns. At that point, it would then have to be determined if the "30% rule" applied to the application. If not, the applicant could move forward with parts of the funding request, while appealing the line-item denials as opposed to the entire application.

Thank you in advance for taking our request for review into consideration. We hope the Commission will be willing to remand these applications back to USAC for further review. Please feel free to contact us if we may be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris A. Quintanilla". The signature is stylized and cursive.

Chris A. Quintanilla

Consulting Project Manager and Attorney-in-Fact  
Representing Charleston Area Construction Charter School  
chrisqu@yesphilly.org  
215/769-0340 x226  
215/769-2784 (facsimile)

cc: Renee Chewning, Charleston Area Construction Charter School  
Michael Sack, Youth Empowerment Services  
Taylor Frome, Youth Empowerment Services

# **EXHIBIT A**

**Appeal of Funding Commitment Decisions  
(Charleston Area Construction Charter School, Johns Island SC,  
BEN 16021503, 471 application: 473546)**

**8 PAGES**



Youth  
Empowerment  
Services

**Main Office**

1231 N. Broad Street  
4<sup>th</sup> Floor  
Philadelphia, PA 19122

Tel: 215.769.0340  
Fax: 215.769.0344

April 7, 2006

Letter of Appeal  
Schools and Libraries Division  
Box 125 – Correspondence Unit  
80 South Jefferson Road  
Whippany, NJ 07981

**RE: Appeal of Funding Commitment Decisions (Charleston Area  
Construction Charter School – Johns Island, SC, BEN 16021503, 471  
application: 473546, FRN: 1305285)**

Dear Sir or Madam:

On behalf of the captioned entity, we would respectfully appeal the SLD decision to not fund the captioned funding request.

It is our understanding that the captioned funding request was not funded because the application was not deemed to be cost-effective. In response to this decision and the reason given, we respectfully submit eight grounds for appeal that we hope will help to overturn this decision. We would request each of these grounds be evaluated independently.

Ground 1: SLD erred in its initial review

It is our contention that, based on publicly available data, there is no policy or guidance given by the FCC that specifically supports the guidelines used in PIA's cost effectiveness review. Furthermore, we contend that the funding request denial, based on this review, appears to be "highly subjective and selective."<sup>1</sup> Therefore, we contend that SLD has erred by subjecting the funding request to the cost effectiveness review guidelines.

<sup>1</sup>[http://www.e-ratecentral.com/archive/News/News2006/weekly\\_news\\_2006\\_0313.asp](http://www.e-ratecentral.com/archive/News/News2006/weekly_news_2006_0313.asp)

Ground 2: SLD erred in its initial review

Our response to the cost-effectiveness review (included as the attached document) was not given due consideration. When PIA opted to deny the funding request, they submitted no counter-argument to any of our six arguments showing the funding request to be cost-effective. Therefore, we are unable to be certain that our arguments were actually considered, and as such, we contend that SLD erred by not properly taking these arguments into due consideration. We hereby re-submit these arguments in the attached document.

### Ground 3: SLD erred in its initial review

The cost-effectiveness review incorrectly drew a correlation between the number of students to be served and the dollar amount of the funding request.

Regardless of the size of a school, there are core and essential technology services that all students should have access to. By making a correlation between the number of students and funding request dollar amounts, as opposed to, the number of students, their fundamental technology needs, and the requested equipment and services, SLD is creating a technology reimbursement amount per student, instead of providing the services that students are entitled to, as the program intends.

### Ground 4: SLD erred in its initial review

The cost-effectiveness review incorrectly drew a correlation between the number of students to be served and the dollar amount of the funding request.

The cost-effectiveness review did not include eligible non-student users (i.e. teachers, administrators, et al) in its statistics.

### Ground 5: SLD erred in its initial review

The cost-effectiveness review incorrectly drew a correlation between the number of students to be served and the dollar amount of the funding request.

“Although the number of students in a school may bear some relationship to the amount of equipment to be maintained, there is no direct link between maintenance expense and the number of students supported.”<sup>2</sup>

<sup>2</sup>[http://www.e-ratecentral.com/archive/News/News2006/weekly\\_news\\_2006\\_0313.asp](http://www.e-ratecentral.com/archive/News/News2006/weekly_news_2006_0313.asp)

### Ground 6: SLD erred in its initial review

The cost-effectiveness review showed statistics for use based on the current number of students in the school. By doing this, we contend that SLD erred, as it did not take into account the life expectancy of the equipment and the number of future students who would utilize this equipment. The school’s enrollment plans are included in the attached document that was originally provided to the PIA reviewer.

### Ground 7: SLD erred in its initial review

SLD erred by going against the public interest in this matter.

By drawing a correlation between the funding request and the number of students, SLD has penalized smaller schools, which is against public interest. Since it is important that students at any school have access to similar core technology resources, and since the overhead for this technology is similar for both small and large schools and school districts, SLD has, in essence, imposed greater restrictions on charter and other small schools, even though research has shown that smaller schools are more effective for certain student populations (such as the population served by Charleston Area Construction Charter School.)

Ground 8: USAC has obtained policy clarification between the time of the funding commitment and the appeal decision

In its February 28<sup>th</sup>, 2006 order, in the matter of the Wyoming Department of Education (DA-06-485A1), the FCC stated: “Although the Commission has concluded that price should be the primary factor in selecting a bid, applicants are given maximum flexibility to take service quality into account and may choose the offering that meets their needs most effectively and efficiently.”

Based on the quality of service it desired and the number of proposals it received, the school did choose the most cost-effective and efficient option available to it.

Thank you for your thoughtful review of our appeal; we hope that we provided sufficient grounds for our appeal to be granted. Should you require additional information or should have any questions, please feel free to contact Chris A. Quintanilla of Youth Empowerment Services, the school’s e-rate project manager and attorney-in-fact in this matter, at 215/694-3955 or [chrisqu@yesphilly.org](mailto:chrisqu@yesphilly.org).

Sincerely,



Chris A. Quintanilla

Consulting Project Manager (for Charleston Area Construction Charter School)

Youth Empowerment Services

1231 N. Broad St., Fl 4 Philadelphia, PA 19122-4021

Telephone: 215/769-0340 x226

Fax: 215/769-2784

Email: [chrisqu@yesphilly.org](mailto:chrisqu@yesphilly.org)

Representing Charleston Area Construction Charter School – Johns Island, SC, BEN 16021503

471 application: 473546

Attachment (1)

February 1, 2006

Marie C. Thomas  
Associate Manger – PIA Reviewer  
Schools and Libraries Division  
80 South Jefferson Road  
Whippany, NJ 07981

**Re: E-Rate Application 473546 for Charleston Area Construction Charter School**

Dear Ms. Thomas,

Thank you for affording us the opportunity to respond to your inquiry about the cost-effectiveness of the Charleston Area Construction Charter School's FY 2005 internal connections integration project.

While on the surface, your letter does appear to raise questions about whether this application is cost-effective, there are some additional facts that should be taken into consideration, prior to making a final determination regarding the funding of this application.

(1) First, SLD typically deals with traditional school environments. Charleston Area Construction Charter School serves a special needs population composed primarily of at-risk students and drop-outs. As these special education students typically require twice the resources of a traditional student (and are usually reimbursed for by school-districts at twice the rate of a traditional student), it is our opinion that the school is effectively serving 100 students when compared to traditional schools.

(2) Second, it is the school's intent to enroll approximately 200 students over the next two years. The school has only enrolled 50 to begin operations with and additional students will be enrolled during rolling admissions throughout the year. It is our contention that it is more cost-effective to put an infrastructure in place that will support the school over the next several years now, as opposed to the school being in a constant state of expansion. The higher initial implementation cost you are citing is offset and mitigated by:

a) not having to manage construction and implementation schedules based on SLD funding commitments that typically take over a year to receive

b) avoiding retrofitting, redesigning and reengineering facilities to support a multi-phase internal connections integration strategy

c) avoiding increased project management fees for multi-year e-rate bidding and application fees

d) a lower overall internal connections budget by procuring items in bulk

(3) Third, while a multi-year internal connections strategy may appear more cost effective, it would signify reduce the schools implementation options because of the "2 out of every 5 year rule" that SLD has recently adopted. If the school were to implement its current

strategy over two years instead of in one year, the school would not be able to take advantage of new eligible technologies for a three-year period, thereby potentially depriving the students who would benefit the most from new technology, of new technology.

(4) Fourth, your statistics do not accurately depict the situation at hand, as described below. Additionally, a litmus test should be applied to each situation described below. This litmus test should ask, “Would the average person, or a person properly educated in the art, find this to be reasonable?”

a) You state the equipment being requested will be used to support 50 students.

SLD rules dictate that eligible equipment must be used for eligible purposes by eligible persons. Staff is typically included in this group. Your number (50) does not include any staff. Therefore, the number you mention should be at least 60. Again, this does not account for students who will be enrolled throughout the year during rolling admissions.

Litmus test result – yes, this is reasonable

b) You state there are six servers, at a total cost of \$172,500 at a ratio of 1 server per 8.3 students.

This depiction is inaccurate and seems as if it is meant to justify a position rather than ask a question. I think this matter needs to be addressed in two different questions:

1) The servers have different and separate roles and it is a best practice to have these roles separated over separate servers so as to eliminate single-points-of-failure on a single-device, as well as to properly balance task roles over separate servers. (I submit this opinion as a technology subject matter expert.)

Litmus test result – yes, this is reasonable

2) Considering the first server, an email server, assuming a 5 year life-span (a conservative figure) at an average cost of \$28,750 (\$172,500 / 6 servers), will serve an average of 130 students and 10 staff per year, over a five year period, this equates to a cost of \$3.42 per individual per month for email service. With a 15% burden on this cost (to account for support costs such as maintenance and staff), this figure becomes \$3.94 per individual per month.

$$\begin{array}{rcccccccc} (\$28,750 & / & 5 & / & 140 & / & 12 & * & 1.15 & = & \$3.936 \\ \text{Server cost} & & \text{year lifespan} & & \text{users} & & \text{months} & & \text{burden} & & \text{= cost} \end{array}$$

Even using your own figures, if the email served only a maximum of 50 students per year, the figure still only is \$11.02 per individual per month.

Litmus test result – yes, this is reasonable

3) Considering the second server, a web hosting server, let’s assume a 5 year life-span (a conservative figure) at an average cost of \$28,750 (\$172,500 / 6 servers). Let’s also assume an 80% allocation for the website hosting needs of an average

of 130 students and 10 staff per year. Let's further assume a 20% allocation for the website hosting needs of the school's website.

Over a five year period, this equates to the following:

80% allocation – user web hosting needs – cost \$23,000.00.

20% allocation – school web hosting needs – cost \$5,750.00.

With an average of 140 users per year for five years, the cost for the user web hosting is \$2.74/mo per user. The burdened cost is \$3.15/mo per user.

With an average of 1 school website hosted per year for five years, the cost for the school web hosting is \$95.83 per month. The burdened cost is \$110.20/month.

Even using your own figures, if the email served only a maximum of 50 students per year, the figure still only is \$7.67 per individual per month. The burdened cost is \$8.82/mo per user.

Litmus test result – yes, this is reasonable

4) The other servers have similar unique purposes. Assuming each server has an average cost of \$28,750, a life-expectancy of 5 years (a conservative figure), and server 140 users per year for five years. The cost for each server is \$3.42/mo per user. The burdened cost is \$3.94/mo per user.

\$3.94 per month per user for DNS resolution

\$3.94 per month per user for terminal server access

\$3.94 per month per user for Internet access through a proxy server

\$3.94 per month per user for network services such as DHCP/WINS

Even using your own figures, if only 50 users were served, this figure would be \$9.58/mo per user.

Litmus test result – yes, this is reasonable

5) It is the intent of the school to have a 2:1 student:computer ratio. Though this may not be the case when the school opens, let's assume this will eventually be the case and the school would ultimately have 100 computers.

6 switches x 24 usable ports per switch equals 144 total ports, used as follows:

100 ports      computers

6 ports        servers

10 ports      interconnection of switches

1 port         router

1 port         firewall

20 ports      ancillary devices (wireless access points, etc...)

138 ports used (95.8% utilization)

Litmus test result – yes, this is reasonable

6) One of the Cisco 2691 routers should be dropped from the application. It was included erroneously as we thought there may be two locations.

Litmus test result – yes, this is reasonable

7) UPS systems are required to ensure the availability of the servers, switches and router. Not including these items would be irresponsible. Using your own figures, the cost is \$5.70 per student per month for this protection, based on a five-year lifespan.

Litmus test result – yes, this is reasonable

8) 120 CAT5e data drops have been included to support 100 computers and 20 telephones based on the school's plans. Again, the school's plan is to have 200 students and 100 computers over the next few years. Installing 50 data drops now and 70 additional drops over the next several years will increase the school's overall engineering and construction costs. After all, a new building does not base its overall wiring plan based on the initial amount of tenants. Scalability is factored into the plan (though this scalability may not be figured into your figures).

Litmus test result – yes, this is reasonable

9) A PBX system with voicemail features has a cost, according to you, of \$27,800 or \$556/student. Assuming the PBX has a six-year lifespan (again, a conservative estimate) and it handles 100 calls a day, 4.5 days a week, for 6 years – that equates to 140,400 calls (again, a conservative estimate). That means the cost of the PBX equates to either \$0.198/call, or is equal to a \$386.11/month 72-month lease with a \$0/buyout.

Litmus test result – yes, this is reasonable

(5) Fifth, your question regarding the Internet Access Server and Web Server is a leading one and appears to involve some degree of trickery (though I am not accusing you of such action or behavior).

As you are undoubtedly aware, servers that provide “substantial software applications, database functions, and storage of end user files” are ineligible under program rules. Your question asks, “which will be used to...”, and not “please indicate *if* either server will be used to...”, thereby implying that we plan on violating program rules. This obviously is not the case. Disregarding this intended or unintended statement, to answer your question:

The Internet Access server will be used as a proxy server and will serve as a conduit between the school's computers and the Internet, thereby acting as a means of security to protect unauthorized access to the school's eligible systems. Pursuant to the information included on page 44 of the eligible services list, this server is eligible.

The Web server will be used to provide information on an open basis for all users of the Internet. Pursuant to the information included on page 54 of the eligible services list, this server is eligible.

Neither of these servers will be used to provide substantial software applications, database functions and storage of end user files.

(6) Sixth, there are several special circumstances you should be aware of when you considered how to calculate the cost of these services. The statistics you used were inappropriate and did not take items into account, such as:

- scalability
- the type of school versus a traditional school
- initial enrollment versus total enrollment
- rolling admissions throughout the school year
- allocation of non-redundant services over non-redundant multiple devices to eliminate single-points-of-failure
- best-practices

It is my hope and expectation that this application will move forward with on a positive-basis where the school receives 100% of the funds it has requested (less the second Cisco router). Despite the suggestions to the opposite, this project is cost-effective and the products and services requested will be valuable additions to the customer (the school).

Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Ch A Quintanilla". The signature is stylized and cursive.

Chris A. Quintanilla  
Consulting Project Manager and Attorney-in-Fact  
Charleston Area Construction Charter School

cc: Renee Chewning, Mike Sack

# **EXHIBIT B**

**Administrator's Decisions on Appeal  
(August 15, 2006)**

**3 PAGES**

Chris A. Quintanilla  
Youth Empowerment Services  
1231 North Broad Street, 4th Floor  
Philadelphia, PA 19122-4021

RECEIVED  
AUG 17 2006  
BY: LF

Billed Entity Number: 16021503  
Form 471 Application Number: 473546  
Form 486 Application Number:



**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2005-2006**

August 15, 2006

Chris A. Quintanilla  
Youth Empowerment Services  
1231 North Broad Street, 4th Floor  
Philadelphia, PA 19122-4021

Re: Applicant Name: CHARLESTON AREA CONSTRUCTION  
CHARTER SCHOOL  
Billed Entity Number: 16021503  
Form 471 Application Number: 473546  
Funding Request Number(s): 1305285  
Your Correspondence Dated: April 07, 2006

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 USAC's Funding Year 2005 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC'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 you will receive a separate letter for each application.

Funding Request Number(s): 1305285  
Decision on Appeal: **Denied**  
Explanation:

- On appeal, you would like the SLD to reconsider its funding denial due to the Form 470 containing service provider contact information. You state none of the persons listed on the Form 470 participated in the competitive bidding process, are associated with any service provider that participated in the bidding process, or are employed in any capacity by any service provider involved in the bidding process. You also state the SLD made an incorrect assumption because of insufficient information in the application file. You explain that PIA was provided with blank copies of service provider certification forms during the Selective Review and that signed ones are available upon request. In closing, you request the SLD to reverse its decision regarding your funding request.

- Review of the appeal letter and all relevant documentation indicates that the FRN was reviewed and denied by the Cost Effective Team, and not denied for service provider involvement. It was determined that the cost per student (\$8,547.90) is very high and the cost and volume of equipment was also considered very high, well beyond the cost effective range. You stated that the school would be purchasing six servers for \$120,500.00 and the maintenance for all equipment is \$36,000 for one year. You have also stated that the plan is to increase student enrollment by 200 over the next two years. However, the reasons provided by the applicant do not support the request as cost effective. The appeal is denied.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the 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 or postmarked within 60 days of the 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, send 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 section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

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

Schools and Libraries Division  
Universal Service Administrative Company

cc: Renee Chewning