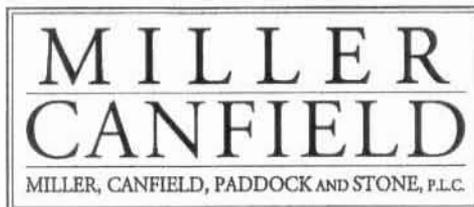


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October 31, 2006

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

Re: Request For Review By Federal Communications Commission
CC Docket Number 02-6
School District of the City of Highland Park
Application Form 471 numbers 324052 & 324177
Funding Request numbers 866098 & 866693

To Whom It May Concern:

Our firm represents the School District of the City of Highland Park, County of Wayne, State of Michigan (the "District"). In that regard, we have enclosed herewith the District's Request For Review (the "Appeal") of two USAC Administrator's Decisions on Implementation Extension Appeal, each dated September 1, 2006, (the "Letter Decisions").

We have also enclosed in support of the Appeal, (1) a binder of Exhibits, including a copy of the Letter Decisions as Exhibit 8 and (2) an Affidavit of the District's E-Rate representatives.

If you need any additional information and/or have any questions concerning the substance or form of this Appeal, please contact me.

Very truly yours,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: 
Kevin A. Smith

Enclosure

Federal Communications Commission -2-

October 31, 2006

cc: Mr. Smerdis L. Hughes, Jr.
Mr. Robert Pastrick
Saul Green, Esq.
Leonard D. Givens, Esq.

DISCLOSURE UNDER TREASURY CIRCULAR 230: The United States Federal tax advice contained in this document and its attachments, if any, may not be used or referred to in the promoting, marketing or recommending of any entity, investment plan or arrangement, nor is such advice intended or written to be used, and may not be used, by a taxpayer for the purpose of avoiding Federal tax penalties. Advice that complies with Treasury Circular 230's "covered opinion" requirements (and thus, may be relied on to avoid tax penalties) may be obtained by contacting the author of this document.

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REQUEST FOR REVIEW
BY
FEDERAL COMMUNICATIONS COMMISSION

CC Docket Number 02-6

HIGHLAND PARK/BILLED ENTITY NAME:	School District of the City of Highland Park
BILLED ENTITY NUMBER:	143023091
APPLICATION (FORM 471) NUMBER:	324052 and 324177
FUNDING REQUEST NUMBER ("FRN"):	866098 and 866693
SERVICE PROVIDER NAME:	Michigan Educational School Services, Inc.

**REQUEST FOR REVIEW OF TWO "ADMINISTRATOR'S DECISION ON
IMPLEMENTATION EXTENSION APPEAL" EACH DATED SEPTEMBER 1, 2006.**

The Appellant, the School District of the City of Highland Park ("Highland Park") requests review (the "Appeal") of the Universal Service Administrative Company (the "USAC") Administrator's Decision on Implementation Extension Appeal. This Appeal is based upon the USAC Administrator's abuse of discretion in applying a "service delivery extension letter request" requirement (the "Letter Request") and the related deadline for filing such a request as the basis to deny the Michigan Educational School Services, Inc., d/b/a Learning Consultants, Inc. ("Learning Consultants") request for payment and two subsequent appeals filed by the Highland Park with USAC. In granting all prior service extension requests and the last contract extension request, the USAC did not request or instruct Highland Park to submit a Letter Request in addition to the FCC Form 500 to be granted an extension of a "service delivery deadline." Further, there are no forms, including FCC Form 500, or written or electronic instructions available to Highland Park, evidencing this additional Letter Request requirement. Highland Park and Learning Consultants only learned of the separate Letter Request requirement when Learning Consultants submitted its invoices to the School and Libraries Division of USAC (the "SLD") for payment under the contract and the SLD denied payment of the invoice because the separate Letter Request had not been filed. All other criteria for inclusion and funding under the application numbers have been met and are not disputed by the SLD. Highland Park, at the instruction of the SLD representative, submitted a Letter Request to satisfy the requirement and Learning Consultants re-submitted the invoices for payment. The SLD denied the second payment request on the ground that the Letter Request was submitted late.

Highland Park respectfully requests that this Appeal be affirmatively granted on the basis that it made a good faith effort to timely request a service extension deadline and maintain its funding commitment from the SLD for the services provided by Learning Consultants, and the only issue of non-compliance is the result of an apparent misunderstanding about a new Letter Request requirement about which Highland Park had not received proper instruction, information or sufficient notice about from the SLD.

Relevant Historical Data.

On October 8, 2002, the USAC issued a Funding Commitment Decision Letter (“FCDL”) for Funding Year 2002 (July 1, 2002 through June 30, 2003) with regard to FRNs 866098 and 866693, for non-recurring services to be performed at Highland Park by Highland Park’s original service provider, Clover Technologies. (See Exhibit 1). Form 486 Notification Letters were issued by the USAC on January 8, 2003. (Exhibit 1). On May 27, 2003, Highland Park submitted a request to change its service provider (a “SPiN Change”) to Learning Consultants, due to the dissolution and bankruptcy of Clover Technologies. (See Exhibit 2). Highland Park received Supplemental Form 471 Application Approval Letters dated September 23, 2003 from USAC evidencing its approval of the requested change. (Exhibit 2). Learning Consultants received a Form 500 Notification Letter, dated October 27, 2003 (the “Notification Letter”) and Funding Commitment Decision Letter, dated October 28, 2003 (“FCDL”) from USAC evidencing the renewed funding commitment with respect to the requested services, including the services represented by the FRNs at issue in this Appeal (the “Services”). (Exhibit 2). The notifications granted an automatic change of the service start date to June 26, 2003, and automatic extension of the contract expiration date to December 30, 2003 due to a change in service providers. (Exhibit 2).

On three subsequent occasions between June 26, 2003 and August 15, 2005, Highland Park timely filed completed FCC Forms 500 seeking an extension of the “Contract Expiration Date” for the Services to be performed by Learning Consultants. (See Exhibit 3). Following the filing of each FCC Form 500 request and supplemental documentation requested by SLD representatives for processing, Learning Consultants received a Notification Letter from the SLD granting the requested extensions, the last such letter extending the contract expiration date to September 30, 2005. (Exhibit 3). During its conversations with the SLD, Highland Park was informed that as long as it filed an FCC Form 500 before the currently authorized contract expiration date expired, it could continue to receive extensions. At no time during its discussions with the SLD representatives was Highland Park provided any instruction, verbal or written, that it was required to submit a separate typewritten Letter Request to extend the “service delivery deadline” in connection with the contract expiration date extension sought pursuant to the FCC Forms 500. Moreover, the FCC Form 500 expressly provides under Block 2 that a request for an extension of the “Contract Expiration Date” is a request to “change the ending date for services.” (See i.e., Exhibit 3). Pursuant to each grant of a “contract extension” by the SLD, Learning Consultants continued to perform under the amended contract with Highland Park in reliance on the determinations set forth in each subsequent Notification Letter, the verbal representations of the SLD representatives during processing, and based on a reasonable belief that the extension of the contract expiration date, by necessity, extended the deadline for performing the Services under such contract.

On August 11, 2005, Highland Park contacted the SLD to advise that Learning Consultants would again be unable to complete delivery of its Services under the existing contract due to reasons beyond Learning Consultants’ control. Consistent with its prior practice, the SLD representative advised and instructed Highland Park to file the requisite FCC Forms 500 for each FRN, and on August 15, 2005, Highland Park submitted the requisite FCC Forms 500 requesting an extension of the contract expiration date from September 30, 2005 to December 31, 2005. (See Exhibit 4). After Highland Park made the corrections requested by SLD

representatives, the SLD granted the extension request and sent Learning Consultants Notification Letters dated September 19, 2005, acknowledging that the contract expiration date had been extended to December 31, 2005. (Exhibit 4). Only after receipt of the FCDLs did the Learning Consultants proceed with the vendor order.

In November 2005, Learning Consultants submitted its invoice Forms 474 indicating that services had been completed prior to the December 31, 2005 deadline and requesting payment for the entire funding commitment amount of \$808,701.86.¹ (Exhibit 5). Upon processing the order and the invoice, USAC sent Learning Consultants a statement form dated November 7, 2005 denying the total billing for the completed services on the ground that the final delivery of services occurred outside of the extended contract expiration date of September 30, 2005, which was the date on file with the SLD. (See Exhibit 6).

After numerous conversations and email exchanges between the SLD and Highland Park and Learning Consultants between November 2005 and January 2006, Learning Consultants received emails dated January 2, 2006, from Terry Patey, a SLD representative, requesting that Highland Park complete and submit the Service Certification Form for each of the FRNs. (Exhibit 7). Two additional email requests dated January 26, 2006 were sent to Learning Consultants again requesting the forms. (Exhibit 7). On January 26, 2006, Highland Park provided the SLD with the requested forms, and on February 2, 2006 Learning Consultants received two emails from the SLD indicating that the invoice process was complete and the FRNs in question were being forwarded for remittance. (Exhibit 7).

After further delay and misleading instruction from the SLD to file additional extension requests, Highland Park and Learning Consultants were advised by telephone for the first time on March 31, 2006 that a separate email or letter request for a "service delivery deadline extension" was necessary and that the FCC Form 500 did not automatically extend the "service delivery deadline date," but only extended the "contract expiration date." Highland Park was provided almost no guidance on the substance of the Letter Request or its form of presentation. It was only advised that a separate request needed to be mailed to the SLD office in New Jersey (and not the Kansas office where the FCC Form 500 is sent) in accordance with the directions on one of its webpages.² As a result, in April 2006, Highland Park submitted a typewritten Letter Request requesting extension of the "service delivery deadline date," which was subsequently

¹ As set forth in the Forms 474, a portion of the services invoiced were completed prior to September 30, 2005. The services represented by the FRNs in question were the only two not completed until November 2005. Upon grant of an invoice extension by the SLD, duplicate invoices for the FRNs that identify the services completed prior to September 30, 2005 were re-submitted on June 26, 2006, and are included as part of Exhibit 5.

² The webpage to which Highland Park was directed, provides instructions for submitting "Service Delivery Deadline Extension Requests," but provides in relevant part that applicants "should file" a service delivery deadline extension request "if [believe that the deadlines listed for one or more of the FRNs are incorrect or that one or more FRNs should appear on the table but are missing. . . ." (See <http://www.universalservice.org/sl/applicants/step11/service-deadlines-extension-requests.aspx>) The webpage does not require applicants to file a separate letter request in connection with a request to extend a contract expiration date. More specifically, the instructions do not reference FCC Form 500 directly or indirectly, and in the absence of further explanation are ambiguous in nature. The instructions, as written, suggest that Letter Requests are a type of remedial action required only to correct clerical errors or omissions related to an "FRN Extension Table" designed merely to display information

denied in June 2006, by USAC because it had been submitted after the September 30, 2005 service delivery deadline on file with the SLD.

Highland Park submitted two appeals to USAC pursuant to the USAC appeal procedure in August 2006. Both Appeals have been denied for the same reason. (See Exhibit 8). In the interim, Learning Consultants had also requested and received an invoice extension that allowed it to re-invoice the SLD for the portion of the project that was completed on or before the previous September 30, 2005 service delivery deadline, in the amount of \$687,397.40 (or approximately 85% of the eligible Services). (See Exhibit 5). This second invoice was authorized by the SLD on June 15, 2006. (Exhibit 5).

Issue for Appeal

1. Highland Park requests that this Appeal be granted on the basis that the only issue of non-compliance relates to an apparent misunderstanding about an arbitrary Letter Request requirement, and said misunderstanding could not be avoided where Highland Park was not provided information or notice about, and had no reasonable means of discovering the requirement on its own.

Highland Park submits that the requirement for the submission of the supplemental Letter Request related to the “delivery of services” under an approved contract is a new policy of either USAC or the FCC. The Letter Request requirement was not communicated to Highland Park prior to the expiration of the applicable deadline for requesting such extensions. Highland Park acted in good faith to request an extension of its contract expiration date and the related services to be performed under the contract in accordance with the instructions available to it, and consistent with past practices of the SLD.

Highland Park submits that if the FCC Forms 500 requesting the extension of the contract expiration date for each of the FRNs were not acceptable or if a supplemental Letter Request to extend the related deadline for delivering the Services under the extended contract was required, then the SLD should have notified Highland Park when the district contacted the SLD in August 2005, prior to the expiration of the then existing contract expiration date, and asked for its advice as to how to properly request another extension. The SLD could have advised Highland Park of the additional requirement upon receipt of the FCC Forms 500. Certainly, the SLD representatives could have alerted Highland Park of the omission during one of the multiple telephone or email conversations held with Highland Park’s representatives to request the other omissions, corrections or inconsistencies necessary to process Highland Park’s request.

The FCC Form 500 expressly provides under Block 2 that a request for an extension of the “Contract Expiration Date” is a request to “change the ending date for services.” The USAC webpage, which provides guidance and instructions to Billed Entities such as Highland Park for submitting extension requests is complicated at best, and in particular, is ambiguous as to the nexus between separate service delivery deadline and a contract expiration date.

Moreover, there appears to be no feedback mechanism to the Billed Entity applicant for the FCC Form 500. Each of the other official forms of the FCC (Forms 470, 471, 486, and 472) generate a notification of receipt and acceptance by the SLD. That is not the case with the Form 500, since Billed Entities/applicants must call the SLD hotline to obtain acknowledgement of receipt and possible approval. There is no written communication from the SLD that evidences a

nexus between the FCC Form 500 and the separate Letter Request. Contrarily, because the webpage instructions provide a different address for mailing Letter Requests than for mailing FCC Form 500 extension requests (the FCC Form 500 is mailed to a Kansas office and the Letter Request to a New Jersey office), Highland Park had even less reason to believe the Letter Request was a prerequisite for receiving payment approval of a contract extended pursuant to FCC Form 500.

Any misunderstanding of the service delivery extension requirements on the part of Highland Park was not due to the action, inaction or negligence of Highland Park or its representatives, but instead was due entirely to the failure of the SLD to communicate or notify Highland Park of the policy. More accurately, Highland Park's failure to meet the supplemental Letter Request deadline was due to circumstances out of its control.

2. Highland Park further requests that this Appeal be granted on the ground that the SLD's invocation of a supplemental Letter Request deadline as the basis to deny payment for a portion of the Services completed by Learning Consultants -- that portion completed in reliance on Highland Park's December 31, 2005 FCC Form 500 extension request -- was a clear abuse of its discretion where payment for the remaining portion of Services completed by Learning Consultants under the extended contract was remitted by the SLD on the basis that all prior FCC Form 500 contract extension requests submitted without supplemental Letter Requests effectuated the proper extension.

In August 2005, at the instruction of the SLD, Highland Park submitted its request to extend the contract expiration date for the Services provided by Learning Consultants in the same manner in which it submitted three prior requests for the same contract — by submitting the completed FCC Form 500 prior to the expiration of the then existing contract expiration date. As with all prior extension requests, Highland Park and Learning Consultants each proceeded to perform under the extended contract on the assumption that the SLD's extension of the "contract expiration date," by necessity, extended the period of time for performing the Services under the contract to the new contract expiration date. Each subsequent grant of an extension by the SLD confirmed the reasonable belief by the participants that the then existing contract and Services performed in accordance therewith were eligible for payment as long as the Services were delivered prior to the expiration of the contract. It is incomprehensible that the SLD would argue that Highland Park or Learning Consultants would have reason to believe or know that the grant of an extension to a contract would not authorize them to perform or deliver services under that contract without a request for additional approval.

While it is conceded that the Federal Communications Commission (the "Commission") has vested in the USAC the responsibility and discretion for administering the E Rate program and making payment determinations, the application of a new Letter Request requirement and filing deadline where it had not previously required such filings is an abuse of the USAC's discretion.

3. Highland Park requests that this Appeal be granted on the basis that the strict application of the requirement for a supplemental Letter Request contravenes the purposes of the Communications Act of 1934, as amended, and would inflict undue hardship on Highland Park.

Highland Park made a good faith effort to remain fully compliant with the statutory requirements and Commission rules for the E-Rate program. Despite having successfully obtained extensions in the past, Highland Park contacted the SLD in advance to request guidance and clarification on the process for properly requesting an extension of the Learning Consultants contract expiration date. Pursuant to those instructions, Highland Park timely filed all of its FCC Forms 500 and met all other conditions for obtaining a contract expiration date extension.

It is an exercise in form over substance for USAC to have denied payment for a portion of the Services provided pursuant to the contract for what amounts to a ministerial, clerical or procedural error when the project and the funding commitment for the eligible Services was fully approved, the project has been completed, there is no allegation of waste, fraud or abuse on the part of Highland Park or Learning Consultants, and the goals for which the program was established have been accomplished..

There is precedence for the Commission to deviate from strict enforcement of its procedural requirements, such as the filing of duplicative and redundant requests for the extension of a contract expiration date and the deadline for performing the services thereunder, respectively. *See Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-487170, et. al., CC Docket No. 02-6, Order, 2006 FCC Lexis 2979 (holding that the Commission may waive any provision of its rules on its own motion where the facts make strict compliance inconsistent with the public interest). The Commission has repeatedly read section 254 of the Act as requiring the E-Rate program to “enhance . . . access to advanced telecommunications and information services for all public and non-profit elementary and secondary school classrooms, health care providers and libraries.” *Id* at para. 9; *see also, Requests for Review by Richmond County School District, Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-451211, 452514, 464649, CC Docket No. 02-6, Order, 21 F.C.C.Rcd 6570. The B-rate Program was in fact designed to make funding available to school districts such as Highland Park and its students, where previously it was unavailable.

Like the hardship and public interest deemed sufficient to justify expectations to the strict application of the rules in those cases, here, if this appeal is rejected there will be a substantial financial impact on Highland Park. Approximately \$121,304.89 is currently owed to Learning Consultants. No other source of funding exists for the District and the approved funding by the SLD was relied upon in procuring the Services and equipment of Learning Consultants. Because of the nature of the Services and equipment provided, it is impossible for Highland Park to return those items and receive any refund. Rejection of the Appeal will result in funds dedicated to the education of students, in other areas, being diverted for this purpose.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

For the reasons set forth above, Highland Park request that its appeal be granted and the funding be approved for payment of the Learning Consultants invoice in accordance with the funding commitment previously approved for Funding Year 2002 by the SLD.

Respectfully Submitted,

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.
150 W. Jefferson, Suite 2500
Detroit, MI 48226
(313) 496-7522

By: 
KEVIN A. SMITH, P-55255

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AFFIDAVIT IN SUPPORT OF APPEAL

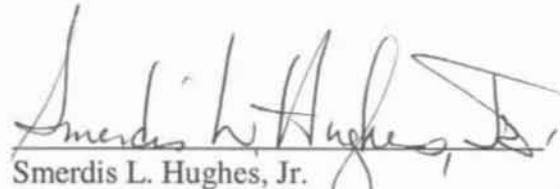
The undersigned, Smerdis L. Hughes, Jr., the Assistant Superintendent of Finance, and Robert S. Pastrick, Accounting Supervisor, of the School District of the City of Highland Park (the "School District"), state under oath, as follows:

1. We are the authorized officers of the School District, who either prepared and/or submitted the applications and forms referenced in the "Request For Review By The Federal Communications Commission" (the "Appeal"), including each of the forms attached as Exhibits thereto. We have reviewed the Appeal as to form and substance, and to the best of our knowledge and belief, the facts and circumstances set forth in said Appeal, including the attached Exhibits, are true and correct as of the date of the Appeal, and the Appeal does not contain, or omit, any material facts or information which would make the statements contained therein misleading. The Exhibits attached to the Appeal are photocopies of the originals filed and held by the School District as part of its business records.

2. It was our understanding and belief, after due diligence and attempts to verify through the School and Libraries Division of the Universal Service Administrative Company (the "SLD") Help Line, that the FCC Form 500 requesting an extension of the contract expiration date was the only form required to extend the deadline for "service delivery" under that contract, and that said deadline had in fact been extended when the SLD granted the extension to the contract expiration date. The School District only learned of the requirement to separately extend the service delivery deadline when the SLD denied payment on the invoices submitted by Learning Consultants, Inc., the School District's service provider, on the ground that the separate letter request had not been filed prior to the deadline.

3. The School District made every effort to be fully compliant with all statutory requirements and the rules of the SLD and Federal Communications Commission in relation to the services at issue in the instant Appeal, and had we been given any information, or even any indication, that a supplemental request was required, such request would have been made prior to the September 30, 2005 deadline.

4. Further, Affiants sayeth not.


Smerdis L. Hughes, Jr.
Assistant Superintendent of Finance


Robert S. Pastrick
Accounting Supervisor

ACKNOWLEDGMENT

STATE OF MICHIGAN

COUNTY OF WAYNE

) ss.
)

On October 31, 2006 before me, a Notary Public, personally appeared Smerdis L. Hughes, Jr. and Robert S. Pastrick, personally known to me to be the persons whose names are subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacities, and that by their signatures on the instrument the persons, or the entity upon behalf of which the persons acted, executed the instrument.



Notary Public

SHIRLEY A. MARKULIN
Notary Public, Macomb Co., MI
My Comm. Expires Jan. 14, 2012

My Commission Expires: Acting in Wayne Co., MI

Administrator's Decision on Implementation Extension Appeal

September 1, 2006

Mr. Smerdis Hughes Jr.
Highland Park School District
20 Bartlett Avenue
Highland Park, MI 48203

Re: Your appeal of the denial of your implementation extension request

471 Application Number: 324177
Funding Request Number(s) 866693
Correspondence Dated: August 16, 2006

After thorough review and investigation of all relevant facts, the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal.

Funding Request Number(s): 866693
Decision on Appeal: **Denied in full**
Explanation:

On appeal you seek reconsideration of USAC's decision to deny your April 1, 2006 request for a service delivery extension.

FCC Rules related to the payment of support for discounted services establish deadlines for service providers to deliver services/products to the applicant. The FCC provides an extension of the deadline under certain conditions. Those conditions are documented in the Reference area on the SLD website. (See Service Delivery Deadlines and Extension Requests for more information.). In accordance with FCC Report and Order (FCC 01-195) released on June 29, 2001, in order to provide additional time to implement contracts or agreements with service providers for non-recurring services, applicants must submit documentation to the Administrator requesting relief on or before the original non-recurring services deadline.

Your appeal has not brought forth clear information establishing that application for relief was made prior to this deadline. Therefore, your appeal is denied.

If you believe there is a basis for further examination of your application, 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 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, 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 USAC/Schools and Libraries web site or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

Thank you for your continued support of and participation in the E-rate program.

Schools and Libraries Division
Universal Service Administrative Company

cc: Michael Pacioni
Michigan Educational School Services, Inc.
17601 James Couzens
Detroit, MI 48235

Administrator's Decision on Implementation Extension Appeal

September 1, 2006

Mr. Smerdis Hughes Jr.
Highland Park School District
20 Bartlett Avenue
Highland Park, MI 48203

Re: Your appeal of the denial of your implementation extension request

471 Application Number: 324052
Funding Request Number(s) 866098
Correspondence Dated: August 16, 2006

After thorough review and investigation of all relevant facts, the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal.

Funding Request Number(s): 866098
Decision on Appeal: **Denied in full**
Explanation:

On appeal you seek reconsideration of USAC's decision to deny your April 1, 2006 request for a service delivery extension.

FCC Rules related to the payment of support for discounted services establish deadlines for service providers to deliver services/products to the applicant. The FCC provides an extension of the deadline under certain conditions. Those conditions are documented in the Reference area on the SLD website. (See Service Delivery Deadlines and Extension Requests for more information.). In accordance with FCC Report and Order (FCC 01-195) released on June 29, 2001, in order to provide additional time to implement contracts or agreements with service providers for non-recurring services, applicants must submit documentation to the Administrator requesting relief on or before the original non-recurring services deadline.

Your appeal has not brought forth clear information establishing that application for relief was made prior to this deadline. Therefore, your appeal is denied.

If you believe there is a basis for further examination of your application, 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 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, 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 USAC/Schools and Libraries web site or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

Thank you for your continued support of and participation in the E-rate program.

Schools and Libraries Division
Universal Service Administrative Company

cc: Michael Pacioni
Michigan Educational School Services, Inc.
17601 James Couzenz
Detroit, MI 48235