

# **& KELLOGG & SOVEREIGN®**

**CONSULTING, LLC** *Providing Innovative Technological Solutions for the World of Education*

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July 6, 2007

Federal Communications Commission  
Office of the Secretary  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Dear Federal Communications Commission:

Please find the enclosed Request for Waiver filed on behalf of Hartford Public Library.

Respectfully submitted,



Debi Sovereign, Consultant

Enclosures

P.O. Box 130, 10501 CR 3665  
Allen, Oklahoma 74825  
office: 580.332.1444  
fax: 580.332.2532  
email: [info@kelloggllc.com](mailto:info@kelloggllc.com)

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

In the Matter of )  
 )  
Request for Waiver by Hartford Public ) CC Docket No. 02-6  
Library of Administrator's Decision on )  
Invoice Deadline Extension Requests )  
dated May 7, 2007.

To The Commission

**REQUEST FOR WAIVER**

**HARTFORD PUBLIC LIBRARY**

July 6, 2007

Debi Sovereign  
Jane Kellogg

Kellogg & Sovereign Consulting, LLC  
10501 CR 3665  
Allen, OK 74825  
(580) 332-1444  
(580) 332-2532 (facsimile)  
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## I. SUMMARY

Hartford Public Library (“Library”) hereby requests that the Commission grant a waiver of the Schools and Libraries Division (SLD) of the Universal Service Administrative Company’s (“USAC”) administrative deadline for submitting invoices for the following funding requests:

Funding Year	2002	2003	2004
Form 471 Application #	303534	362118	434831
Funding Request Numbers	793433 - \$6,634.20 793537 - \$11,534.40 807208 - \$3,767.90	991571-\$3,123.25 991614-\$9,180.00	1212265-\$458.14 1212266-\$458.14 1212267-\$9,146.41

The Administrator’s decision on Invoice Deadline Extension Request: Denied

We are requesting that the Commission waive SLD’s administrative deadline for filing invoices for the above listed funding requests as the reason invoices were not timely filed were due to circumstances beyond the service providers’ control and documentation requirements that necessitate third-party contact.

## BACKGROUND

We have included the original Invoice Deadline Extension request as Attachment 2. The denial letter issued by the Universal Service Administrative Company (“USAC”) is included as Attachment 1.

According to USAC’s web site, <http://www.usac.org/sl/applicants/step11/invoice-deadlines-extension-requests.aspx>, USAC provides for the extension of invoice deadlines under certain conditions. These conditions include:

- Authorized service substitutions
- No timely USAC notice (e.g., the service provider's Form 486 Notification Letter is returned as undeliverable)
- USAC errors (for example, in the data entry of a form) that ultimately result in a late invoice
- USAC delays in data entry that ultimately result in a late invoice
- **Documentation requirements that necessitate third-party contact or certification**
- Natural or man-made disasters that prevent timely filing of invoices
- "Good Samaritan" BEARs
- **Circumstances beyond the service provider's control**

## ARGUMENT

The Administrator's decision letter states:

“Current deadline guidelines and procedures do not allow approval for the reason submitted.”

The reasons submitted in the invoice extension requests are clearly listed on the USAC web site: “Circumstances beyond the service provider's control” and “Documentation requirements that necessitate third-party contact or certification.”

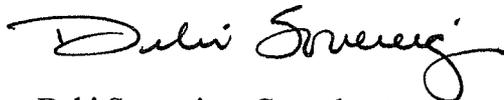
The responsibility for filing E-Rate applications at Hartford Library fell under the technology manager until the Library reorganized in September, 2005. At that time, the Library moved E-Rate responsibility to the Associate Librarian/Information Technology Services and performed an internal audit of their E-Rate filings. The Library discovered that even though they had received E-Rate funding and incurred the associated charges, the service providers had not applied discounts to their accounts. The only explanation for the discounts not being applied was that there was a miscommunication between the service providers and the Library regarding invoicing responsibility. Consequently, the Library requested an extension of time to file the invoices so they could gather the

appropriate documentation from their records and third parties as needed in order to properly prepare the reimbursement requests.

## **CONCLUSION**

We therefore request that the Commission waive the USAC administrative deadline for submitting invoices for the above referenced funding requests and allow the applicant additional time to properly submit reimbursement requests.

Respectfully Submitted,



Debi Sovereign, Consultant

## **ATTACHMENTS**

1. Administrator's Decision on Invoice Deadline Extension Request, May 7, 2007
  - A. Form 471 Application # 303534
  - B. Form 471 Application # 362118
  - C. Form 471 Application # 434831
2. Invoice Deadline Extension Request filed March 1, 2007
  - A. Form 471 Application # 303534
  - B. Form 471 Application # 362118
  - C. Form 471 Application # 434831
3. Letter of Agency

# **ATTACHMENT 1**

## **Administrator's Decision on Invoice Deadline Extension Request, May 7, 2007**

- A. Form 471 Application # 303534**
- B. Form 471 Application # 362118**
- C. Form 471 Application # 434831**



Administrator's Decision on Invoice Deadline Extension Request

May 7, 2007

Debi Sovereign
Kellogg & Sovereign
P.O. Box 130
Allen, OK 07981

Re: Hartford Public Library

RE: SLD Invoice #: N/A BEAR or SPI: N/A
Invoice Date: N/A

SLD Line(s) #: N/A
Vendor invoice #: N/A
471 Application Number: 303534
Funding Request Number(s): 793433, 793537, 807208
Your Correspondence Dated: March 1, 2007

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 invoice deadline extension request for the invoice number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Invoice Number: N/A Line(s): N/A

Decision on Request: Denied

Reason: Current deadline guidelines and procedures do not allow approval for the reason submitted.

TO APPEAL THIS DECISION:

ATTACHMENT # 1-A



**Administrator's Decision on Invoice Deadline Extension Request**

May 7, 2007

Debi Sovereign  
Kellogg & Sovereign  
P.O. Box 130  
Allen, OK 07981

Re: Hartford Public Library

RE: SLD Invoice #: N/A BEAR or SPI: N/A  
Invoice Date: N/A

SLD Line(s) #: N/A  
Vendor invoice #: N/A  
471 Application Number: 362118  
Funding Request Number(s): 991571, 991614  
Your Correspondence Dated: March 1, 2007

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 invoice deadline extension request for the invoice number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Invoice Number: N/A Line(s): N/A

Decision on Request: **Denied**

Reason: Current deadline guidelines and procedures do not allow approval for the reason submitted.

TO APPEAL THIS DECISION:

**ATTACHMENT # 1-B**



Administrator's Decision on Invoice Deadline Extension Request

May 7, 2007

Debi Sovereign
Kellogg & Sovereign
P.O. Box 130
Allen, OK 07981

Re: Hartford Public Library

RE: SLD Invoice #: N/A BEAR or SPI: N/A
Invoice Date: N/A
SLD Line(s) #: N/A
Vendor invoice #: N/A
471 Application Number: 434831
Funding Request Number(s): 1212265, 1212266, 1212267
Your Correspondence Dated: March 1, 2007

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 invoice deadline extension request for the invoice number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Invoice Number: N/A Line(s): N/A

Decision on Request: Denied

Reason: Current deadline guidelines and procedures do not allow approval for the reason submitted.

TO APPEAL THIS DECISION:

ATTACHMENT # 1-C

## **ATTACHMENT 2**

### **Invoice Deadline Extension Request filed March 1, 2007**

- A. Form 471Application # 303534**
- B. Form 471Application # 362118**
- C. Form 471Application # 434831**



P.O. Box 130 • Allen, OK 74825 • p 580.332.1444 • f 580.332.2532 • dsovereign@kelloggllc.com

March 1, 2007

Invoice Deadline Extension Request  
Schools and Libraries Division - Correspondence Unit  
100 S. Jefferson Road  
P.O. Box 902  
Whippany, NJ 07981  
(973) 599-6526

### INVOICING DEADLINE EXTENSION REQUEST

**Contact Name:**

Debi Sovereign, Consultant  
P.O. Box 130  
Allen, OK 74825  
Phone: 580.332.1444, Fax: 580.332.2532  
Email: [dsovereign@kelloggllc.com](mailto:dsovereign@kelloggllc.com)

Case # 21-557413

Billed Entity	Hartford Public Library
Billed Entity Number	214822
Form 471 Application Number	303534
Funding Year:	2002
Funding Request Numbers:	793433 (\$6,634.20) SPIN 143001305, Southern New England Tel. Co.
	793537 (\$11,534.40) SPIN 143000677, Verizon Wireless
	807208 (\$3,767.90) SPIN 143000677, Verizon Wireless

Reason for Invoice Deadline Extension Request:

Documentation requirements that necessitate third-party contact or certification and circumstances beyond the service provider's control.

Discussion:

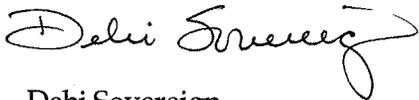
The applicant thought that the service provider had applied discounts to their bills for the 2002-03 funding year. When we were reviewing the amounts disbursed for 2002-03, it turned out that no discounts had been applied for these funding requests. As a result, the applicant needs to file for reimbursement for the services that were received and paid in full.

ATTACHMENT # 2A G2

The applicant will need to gather the appropriate documentation from their records and third parties as needed in order to properly prepare the reimbursement requests.

Consequently, due to documentation requirements that necessitate third party contact and circumstances beyond the service provider's control, we are requesting an extension of time to file the invoices for the above listed funding request numbers.

Respectfully submitted,



Debi Sovereign  
Consultant

Attachment: Letter of Agency

ATTACHMENT # 2 A (2)



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March 1, 2007

Invoice Deadline Extension Request  
Schools and Libraries Division - Correspondence Unit  
100 S. Jefferson Road  
P.O. Box 902  
Whippany, NJ 07981  
(973) 599-6526

### INVOICING DEADLINE EXTENSION REQUEST

**Contact Name:**

Debi Sovereign, Consultant  
P.O. Box 130  
Allen, OK 74825  
Phone: 580.332.1444, Fax: 580.332.2532  
Email: [dsovereign@kelloggllc.com](mailto:dsovereign@kelloggllc.com)

Case # 21-557412

Billed Entity	Hartford Public Library
Billed Entity Number	214822
Form 471 Application Number	362118
Funding Year:	2003
Funding Request Numbers:	991571 (\$3,123.25) SPIN 143000677, Verizon Wireless
	991614 (\$9,180.00) SPIN 143004911, Netplex, LLC

Reason for Invoice Deadline Extension Request:

Documentation requirements that necessitate third-party contact or certification and circumstances beyond the service provider's control.

Discussion:

The applicant thought that the service provider had applied discounts to their bills for the 2003-04 funding year. When we were reviewing the amounts disbursed for 2003-04, it turned out that no discounts had been applied for FRN 991571, and only part of the discounts were received for FRN 991614. As a result, the applicant needs to file for reimbursement for the services that were received and paid in full. The applicant will need

ATTACHMENT # 2B62

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to gather the appropriate documentation from their records and third parties as needed in order to properly prepare the reimbursement requests.

Consequently, due to documentation requirements that necessitate third party contact and circumstances beyond the service provider's control, we are requesting an extension of time to file the invoices for the above listed funding request numbers.

Respectfully submitted,



Debi Sovereign  
Consultant

Attachment: Letter of Agency

ATTACHMENT # 2B(2)



P.O. Box 130 • Allen, OK 74825 • p 580.332.1444 • f 580.332.2532 • dsovereign@kelloggllc.com

March 1, 2007

Invoice Deadline Extension Request  
Schools and Libraries Division - Correspondence Unit  
100 S. Jefferson Road  
P.O. Box 902  
Whippany, NJ 07981  
(973) 599-6526

### INVOICING DEADLINE EXTENSION REQUEST

**Contact Name:**

Debi Sovereign, Consultant  
P.O. Box 130  
Allen, OK 74825  
Phone: 580.332.1444, Fax: 580.332.2532  
Email: [dsovereign@kelloggllc.com](mailto:dsovereign@kelloggllc.com)

Case # 21-557407

Billed Entity	Hartford Public Library
Billed Entity Number	214822
Form 471 Application Number	434831
Funding Year:	2004
Funding Request Numbers:	1212265 (\$458.14) SPIN 143001305, Southern New England Tel. Co.
	1212266 (\$458.14) SPIN 143001305, Southern New England Tel. Co.
	1212267 (\$9,146.41) SPIN 143000677, Verizon Wireless

**Reason for Invoice Deadline Extension Request:**

Documentation requirements that necessitate third-party contact or certification and circumstances beyond the service provider's control.

**Discussion:**

The applicant thought that the service provider had applied discounts to their bills for the 2004-05 funding year. When we were reviewing the amounts disbursed for 2004-05, it turned out that no discounts had been applied. As a result, the applicant needs to file for reimbursement for the services that were received and paid in full. The applicant will need

ATTACHMENT # 2C (1)

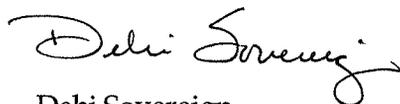
KELLOGG & SOVEREIGN® CONSULTING, LLC

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to gather the appropriate documentation from their records and third parties as needed in order to properly prepare the reimbursement requests.

Consequently, due to documentation requirements that necessitate third party contact and circumstances beyond the service provider's control, we are requesting an extension of time to file the invoices for the above listed funding request numbers.

Respectfully submitted,



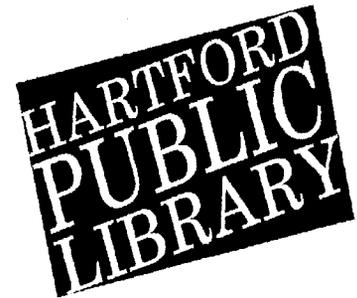
Debi Sovereign  
Consultant

Attachment: Letter of Agency

ATTACHMENT # 2C (2)

# **ATTACHMENT 3**

## **Letter of Agency**



**KELLOGG & SOVEREIGN CONSULTING, LLC**  
**LETTER OF AGENCY**  
**E-Rate Program Years 2002, 2003, and 2004**

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I authorize Jane Kellogg, Don Kellogg, Debi Sovereign, and/or Tacy Olivo, representatives of Kellogg & Sovereign Consulting, LLC, to submit the E-Rate Forms 470, 471, 486, 500, 472 (BEAR form), and other forms requested by the Schools and Libraries Division (SLD) of the USAC on behalf of Hartford Public Library. Due to uncertainties inherent in SLD's funding process, I acknowledge that Kellogg & Sovereign Consulting, LLC makes no warranties or guarantees of E-Rate funding.

Name of Library: HARTFORD PUBLIC LIBRARY (Entity # 214822)

As such, they are authorized to conduct the following on our behalf to:

- Prepare and submit all paperwork requested by the Schools and Libraries Division of the USAC (SLD)
- Act as our agent in working with representatives of SLD to resolve any questions or problems with applications
- Act as our agent in working with representatives of service providers listed on our E-Rate applications in order to submit forms and request documentation needed for both approval of funding and receipt of discounts or reimbursements on products/services funded.

ATTACHMENT # 3 (1)

I also understand that in submitting these forms on behalf of Hartford Public Library, representatives of Kellogg & Sovereign Consulting, LLC are making certifications for the library system. By signing this letter of agency, I make the following certifications as required by the Schools and Libraries Division:

1. I recognize that support under this program is conditional upon the library(ies) I represent (a) securing access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to use the services purchased effectively, and (b) securing funds to pay the library(ies)' discounted charges for eligible services.
2. I certify that our library has an approved Technology Plan.
3. I certify that the library(ies) eligible for support that I am representing have complied with all applicable state and local laws regarding procurement of services for which support is being sought.
4. I certify that the library's purchases at discounts provided by 47 U.S.C. Sec 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.
5. I certify that the library(ies) I represent will comply with all program rules, and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.
6. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service receive an appropriate share of benefits from those services.
7. I recognize that I may be audited pursuant to this library's application. I will retain for five years any and all worksheets and other records that are used in preparation of our library's E-Rate application, and, if audited, will make available to the Administrator such records.
8. I certify that the library(ies) I represent has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S. C. Sec. 254(h) and (l).
9. I understand that persons willfully making false statements on the E-Rate forms or through this Letter of Agency can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502 and 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.
10. I certify that I am authorized to sign this letter of agency and to the best of my knowledge, information and belief, all information provided to Kellogg & Sovereign Consulting, LLC for the E-Rate submission are true.

By : HARTFORD PUBLIC LIBRARY

Signature of Authorized Person: Louise Blabak Date: 28 December 06  
Printed Name of Authorized Person: Louise Blabak Title: Chief Librarian