

DOCKET FILE COPY ORIGINAL

RECEIVED & INSPECTED

DEC - 4 2007

FCC-MAILROOM

**FEDERAL COMMUNICATIONS COMMISSION**

In Re: FCC Form 471 Application Number 562029  
Funding Request Number (FRN): 1550332, 1550351, 1550382  
Billed Entity Number (BEN) 131684  
Applicant's Form Identifier: 2007-2008

**CC Docket No. 02-6**

**WAIVER REQUEST**

NOW COMES Mackinac Island School District (Appellant) and files this Waiver Request in response to a Universal Service Administrative Company's (USAC) Administrator's Decision on Appeal (DOA) – Funding Year 2007-2008 dated October 5, 2007. Attachment 1.

The DOA stated: "Our records show that your appeal was postmarked more than 60 days after the date your Funding Commitment Decision Letter was issued."<sup>1</sup>

Appellant requests that it be granted a waiver by the Federal Communications Commission in order to allow its original appeal to be reviewed by the USAC.

**STATEMENT OF FACTS**

Appellant filed its FY 2007 Form 471 on January 29, 2007. Attachment 2.

Form 471 contained 3 FRN's - #1550332 for Internet Access; #1550351 for Internet Access and #1550382 for Basic Maintenance of Internal Connections.

After filing Form 471, Appellant had a Program Integrity Assurance (PIA) review. By letter dated May 3, 2007, the PIA reviewer requested clarification and information concerning FY 2007, Form 471, application #562029, FRN 1550382, the FRN for Basic Maintenance of Internal Connections.

Appellant responded to the request from the PIA reviewer both orally and by email on June 21, 2007. Attachment 3.

---

<sup>1</sup> See Attachment 1.

No. of Copies rec'd  
List A B C D E

021

The email read as follows: "As per our conversation of June 20, we have been advised by our ISD to request that you cancel our application for internal maintenance for the 2007-2008 school year."<sup>2</sup>

In response to this request, Appellant received a Funding Commitment Decision Letter (FCDL) dated July 26, 2007, which cancelled not only the Basic Maintenance of Internal Connections FRN #1550382 but also the Internet Access FRN #1550332 and the Internet Access FRN #1550351, both Priority One applications. Attachment 4.

In the FCDL, the funding commitment report indicated "FRN canceled in consultation with the applicant" for all 3 FRN's.<sup>3</sup> In point of fact, Appellant only requested withdrawal of the Basic Maintenance FRN #1550382.

Appellant filed its appeal of this FCDL by letter dated September 26, 2007. Attachment 5.

The appeal attempted to explain that Appellant only wanted to cancel the maintenance FRN and not the 2 Internet Access FRN's. The letter further requested that funding for Internet Access and Web Hosting be reinstated.

The USAC, by letter dated October 4, 2007, transmitted the Administrator's Appeal Acknowledgement Letter, which indicated that a review would be undertaken by USAC. Attachment 6.

This communication was then followed by the October 5, 2007, Administrator's Decision on Appeal referenced above which indicated that the appeal was untimely.<sup>4</sup>

### ARGUMENT

Appellant admits that it filed its Letter of Appeal (Attachment 4) in an untimely manner. Appellant is a very small school district and is part of the Eastern Upper Peninsula Intermediate School District (EUPISD) which is a consortium of schools located in the eastern part of Michigan's Upper Peninsula. As part of the consortium, the EUPISD files E-rate requests for some services for individual

---

<sup>2</sup> See Attachment 3.

<sup>3</sup> See Attachment 4.

<sup>4</sup> See Attachment 1.

schools as part of the consortia. In other instances, the individual schools file their own requests for E-rate funding.

In the case at hand, Appellant filed its own FY 2007, Form 471, requesting Priority One funding for 2 separate Internet Access FRN's. Further, as part of the Form 471, Appellant also requested funding for Basic Maintenance of Internal Connections, a Priority Two funding request.

After discussions with the PIA reviewer and the EUPISD, it was determined that the request for the Priority Two Basic Maintenance of Internal Connections, FRN #1550382, should be withdrawn since Appellant is only a 50% discount district and the likelihood of funding was uncertain.

Appellant's request to cancel the Basic Maintenance of Internal Connections was characterized as "internal maintenance" in its email of June 21, 2007. Attachment 3.

Appellant's request to withdraw only FRN 31550382 was misunderstood and resulted in all three FRN's cancellations.

Appellant worked with the EUPISD to determine how best to resolve this issue and decided to appeal the decision. The Letter of Appeal was filed September 26, 2007, two days after its due date. Appellant apologizes for the untimely filing but in attempting to gather information pertinent to the appeal, a communication breakdown occurred between the EUPISD and Appellant which resulted in the delayed filing. Appellant certainly did not intentionally file late as it had everything to lose by doing so.

Appellant relies upon this tribunal's holding in the *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, New Orleans, LA, et al., decided May 2, 2006*:

As we recently noted, many E-rate program beneficiaries, particularly small entities, contend that the application process is complicated, resulting in a significant number of applications for E-rate support being denied for ministerial, clerical or procedural errors.<sup>5</sup> We find that the actions we take here to provide relief from

---

<sup>5</sup> *Comprehensive Review of Universal Service Fund Management, Administration, and Oversight, Federal-State Joint Board on Universal Service, Schools and Libraries Universal Service Support Mechanism, Rural Health Care Support Mechanism, Lifeline and Linkup, Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, WC Docket Nos. 05-195, 02-60, 03-109, CC Docket Nos. 96-45, 02-6, 97-21, Notice of Proposed

these types of errors in the application process will promote the statutory requirements of section 254(h) of the Communications Act of 1934, as amended (the Act), by helping to ensure that eligible schools and libraries actually obtain access to discounted telecommunications and information services.<sup>6</sup> In particular, we believe that by directing USAC to modify certain application processing procedures and granting a limited waiver of our application filing rules, we will provide for a more effective application processing system that will ensure eligible schools and libraries will be able to realize the intended benefits of the E-rate program as we consider additional steps to reform and improve the E-rate program.<sup>7</sup> Requiring USAC to take these additional steps will not reduce or eliminate any application review procedures or lessen the program requirements that applicants must comply with to receive funding. Indeed, we retain our commitment to detecting and deterring potential instances of waste, fraud, and abuse by ensuring that USAC continues to scrutinize applications and takes steps to educate applicants in a manner that fosters program participation. We also emphasize that our actions taken in this Order should have minimal effect on the overall federal Universal Service Fund (USF or the Fund), because the monies needed to fund these appeals have already been collected and held in reserve.<sup>8</sup>

Appellant did not intentionally miss the filing deadline as it wanted the Priority 1 funding requests reinstated. Further, Appellant would be detrimentally affected if the requests were not granted.

Appellant would respectfully request that this honorable body allow a waiver of the filing deadline for its appeal from the USAC Administrator's Decision on

---

Rulemaking and Further Notice of Proposed Rulemaking, 20 FCC Rcd 11308 (2005) (*Comprehensive Review NPRM*).

<sup>6</sup> 47 U.S.C. § 254(h). The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, amended the Communications Act of 1934.

<sup>7</sup> *Comprehensive Review NPRM*, 20 FCC Rcd at 11324-25, paras. 37-40 (seeking comment on the application process and competitive bidding requirements for the schools and libraries program).

<sup>8</sup> We estimate that the appeals granted in this Order involve applications for approximately \$68 million in funding for Funding Years 1999-2005. We note that USAC has already reserved approximately \$585 million to fund outstanding appeals. *See, e.g.*, Universal Service Administrative Company, Federal Universal Service Support Mechanisms Fund Size Projections for the Fourth Quarter 2005, dated August 2, 2005. Thus, we determine that the action we take today should have minimal effect on the USF as a whole.

Appeal and grant the reinstatement of the Internet Access FRN's #1550332 and #1550351, both Priority One applications.

Appellant did not intentionally file its appeal in an untimely manner nor did it attempt to gain funding through fraudulent means. Further, Appellant's students would be detrimentally harmed if the Priority One funding requests were not allowed.

This honorable body recently addressed this issue in the *Matter of Requests for Review of Decisions of the Universal Service Administrator by Joseph Jingoli & Son, Inc. Lawrence, NJ, et al, File Nos. SLD 475364, et al, decided October 30, 2007*. In this decision, several Appellants claimed that they had cancelled funding requests in error. In addressing the errors, the FCC stated:

In these instances, the applicants did not intend to cancel their funding requests. For example, Windsor Public Schools accidentally included several FRNs that it did not want to cancel when it requested that just one other FRN be cancelled.<sup>9</sup> The School District of Pontiac inadvertently cancelled one of its FRNs because it thought it was a duplicate FRN from a prior funding year.<sup>10</sup> Resurrection School cancelled its entire Form 471 application thinking the application only reflected the wiring services and not realizing that all the FRNs associated with the application were cancelled as well.<sup>11</sup> Petitioners generally claim that inadvertent errors or a staff change resulted in the cancellation of their funding requests. As the Commission discussed in the *Bishop Perry Order*, we do not believe that such minor mistakes warrant the rejection of these Petitioners' E-rate funding requests.<sup>12</sup> As noted by the Commission, the primary jobs of most of the people filling out these forms include school and library administrators, technology coordinators, librarians and teachers, as opposed to positions dedicated to pursuing federal grants, **especially in small school districts**.<sup>13</sup> In addition, there is no evidence of waste, fraud

---

<sup>9</sup> Windsor Public School Request for Review at 3.

<sup>10</sup> School District of the City of Pontiac Request for Review at 1.

<sup>11</sup> Resurrection School at 1.

<sup>12</sup> See *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, New Orleans, LA, et al., Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 21 FCC Rcd 5316 (2006) (*Bishop Perry Order*).

<sup>13</sup> *Id.* at 5323, para. 14.

or abuse, misuse of funds, or a failure to adhere to core program requirements. Furthermore, we emphasize that the actions taken in this Order should have minimal effect on the overall federal Universal Service Fund, because the monies needed to fund these appeals have already been collected and held in reserve. (Emphasis added.)

Appellant argues that it should be allowed to have its appeal heard.

As this body has opined in several holdings, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.

Denying the waiver in the instant case and thereby denying the requests for funding would create undue hardship and prevent this eligible school from receiving E-rate funding for eligible Priority One services.

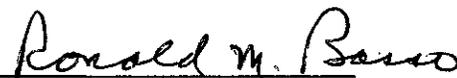
Granting this appeal is in the public interest and in the spirit of the E-rate program which provides opportunities for students to receive the technology to compete in the 21<sup>st</sup> Century.

Appellant respectfully requests that a waiver be granted from the filing deadline for its appeal so that it's appeal may be considered by the USAC. Further, Appellant requests that FY 2007 Form 471 FRN's - #1550332 for Internet Access and #1550351 for Internet Access be reinstated and approved for funding.

Respectfully submitted,

Mackinac Island Public School

Dated: December 3, 2007



By: Ronald M. Basso (P24805)  
Basso & Basso Legal Services LLC  
PO Box 63  
Iron River MI 49935

Telephone: 906.265.4410  
Email: ron@bassoandbasso.us



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

---

**Administrator's Decision on Appeal – Funding Year 2007-2008**

October 05, 2007

Dr Roger S. Schrock  
Mackinac Island Public School  
P. O. Box 340  
Lake Shore Drive  
Mackinac Island, MI 49757-0340

Re: Applicant Name: MACKINAC ISLAND SCHOOL DIST  
Billed Entity Number: 131684  
Form 471 Application Number: 562029  
Funding Request Number(s): 1550332, 1550351, 1550382  
Decision Letter Date: July 26, 2007  
Date Appeal Postmarked: September 26, 2007  
Your Correspondence Dated: September 26, 2007

Our records show that your appeal was postmarked more than 60 days after the date your Funding Commitment Decision Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

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 **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 SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

Schools and Libraries Division  
Universal Service Administrative Company

<b>FCC Form 471</b>	Do not write in this area.	Approval by OMB 3060-0808
<b>Schools and Libraries Universal Service</b> <b>Description of Services Ordered and Certification Form 471</b> Estimated Average Burden Hours per Response: 4 hours This form asks schools and libraries to list the eligible telecommunications-related services they have ordered and estimate the annual charges for them so that the Fund Administrator can set aside sufficient support to reimburse providers for services. Please read instructions before beginning this application. (You can also file online at <a href="http://www.sl.universalservice.org">www.sl.universalservice.org</a> .) The instructions include information on the deadlines for filing this application.		
Applicant's Form Identifier <small>(Create your own code to identify THIS form 471)</small>		Form 471 Application#
MACK IS		562029
<b>Block 1: Billed Entity Information</b> (The "Billed Entity" is the entity paying the bills for the service listed on this form.)		
1 a	Name of Billed Entity: MACKINAC ISLAND SCHOOL DIST	
2 a	Funding Year: July 1, 2007 Through June 30: 2008	Billed Entity Number:131684
4 a	Street Address, P.O. Box, or Routing Number: BOX 340 LAKE SHORE DRIVE	
	City: MACKINAC ISLAND	
	State: MI	Zip Code 49757
b	Telephone Number: 906-847-3377	c Fax Number 906-847-3773
5 a	Type of Application <input type="checkbox"/> Individual School (individual public or non-public school) <input checked="" type="checkbox"/> School District (LEA; public or non-public [e.g. diocesan] local district representing multiple schools) <input type="checkbox"/> Library (including library system, library outlet/branch or library consortium as defined under LSTA) <input type="checkbox"/> Consortium <input type="checkbox"/> Check here if any members of this consortium are ineligible or non-governmental entities	
6	Contact Person's Name: DR ROGER SCHROCK	
First, if the Contact Person's Street Address is the same as in Item 4, check this box. If not, please complete the entries for the Street Address below.		
b	Street Address, P.O. Box, or Routing Number: BOX 340 LAKE SHORE DRIVE	
	City: MACKINAC ISLAND	
	State: MI	Zip Code 49757
<input type="checkbox"/> c	Telephone Number: 906-847-3377	<input type="checkbox"/> d Fax Number 906-847-3773
<input checked="" type="checkbox"/> e	E-mail Address: rschrock@sup.k12.mi.us	
f	Holiday/vacation/summer contact information	



Entity Number	131684	Applicant's Form Identifier	MACK IS
Contact Person	DR ROGER SCHROCK	Phone Number	906-847-3377

This information will facilitate the processing of your applications. Please complete all rows that apply to services for which you are requesting discounts. Complete this information on the FIRST Form 471 you file, to encompass this and all other Forms 471 you will file for this funding year. You need not complete this information on subsequent Forms 471. Provide your best estimates for the services ordered across ALL of your Forms 471.

Schools/school districts complete Item 7. Libraries complete Item 8. Consortia complete Item 7 and/or Item 8.

**Block 2: Impact of Services Ordered on Schools**

IF THIS APPLICATION INCLUDES SCHOOLS...	BEFORE ORDER	AFTER ORDER
7a Number of students to be served		76
NO DATA		

**Block 3: Impact of Services Ordered on Libraries**

NOT APPLICABLE AS THIS APPLICATION IS FOR DISTRICT

Worksheet A No: 871045	Student Count: 76	Shared Discount: N/A
Weighted Product (Sum. Column 8): 38		
1. School Name: MACKINAC ISLAND ELEM-HIGH SCH 2. Entity Number: 58408 NCES: 26 22230 05938 3. Rural/Urban: Rural 4. Student Count: 76 5. NSLP Students: 13 6. NSLP Students/Students: 17.105% 7. Discount: 50% 8. Weighted Product: 38 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N		

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

FRN: 1550332 FCDL Date:	
10. Original FRN:	
11. Category of Service: Internet Access	12. 470 Application Number: 128690000602662
13. SPIN: 143004465	14. Service Provider Name: Eastern Upper Peninsula Intermediate School District
15a. Non-Contracted tariffed/Month to Month Service:	15b. Contract Number: NA
15c. Covered under State Master Contract:	15d. FRN from Previous Year:
16a. Billing Account Number:	16b. Multiple Billing Account Numbers?:
17. Allowable Contract Date: 01/03/2007	18. Contract Award Date: 01/05/2007
19a. Service Start Date: 07/01/2007	19b. Service End Date:
20. Contract Expiration Date: 06/30/2008	
21. Attachment #: MACK IS	22. Block 4 Entity Number: 58408
23a. Monthly Charges: \$0.00	23b. Ineligible monthly amt.: \$0.00
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: 26124.13	23g. Ineligible non-recurring amt.: 0
23h. Annual pre-discount amount for eligible non-recurring charges ( 23f - 23g): \$26,124.13	
23i. Total program year pre-discount amount ( 23e + 23h): \$26,124.13	
23j. % discount (from Block 4): 50	
23k. Funding Commitment Request ( 23i x 23j): \$13,062.07	

FRN: 1550351 FCDL Date:	
10. Original FRN:	
11. Category of Service: Internet Access	12. 470 Application Number: 128690000602662
13. SPIN: 143004465	14. Service Provider Name: Eastern Upper Peninsula Intermediate School District
15a. Non-Contracted tariffed/Month to Month Service:	15b. Contract Number: NA
15c. Covered under State Master Contract:	15d. FRN from Previous Year:
16a. Billing Account Number:	16b. Multiple Billing Account Numbers?:
17. Allowable Contract Date: 01/03/2007	18. Contract Award Date: 01/05/2007
19a. Service Start Date: 07/01/2007	19b. Service End Date:
20. Contract Expiration Date: 06/30/2008	
21. Attachment #: MACK IS 2	22. Block 4 Entity Number: 58408
23a. Monthly Charges: \$.00	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$.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: 1650	23g. Ineligible non-recurring amt.: 0
23h. Annual pre-discount amount for eligible non-recurring charges ( 23f - 23g): \$1,650.00	
23i. Total program year pre-discount amount ( 23e + 23h): \$1,650.00	
23j. % discount (from Block 4): 50	
23k. Funding Commitment Request ( 23i x 23j): \$825.00	

FRN: 1550382 FCDL Date:	
10. Original FRN:	
11. Category of Service: Basic Maintenance of Internal Connections	12. 470 Application Number: 128690000602662
13. SPIN: 143004465	14. Service Provider Name: Eastern Upper Peninsula Intermediate School District
15a. Non-Contracted tariffed/Month to Month Service:	15b. Contract Number: NA
15c. Covered under State Master Contract:	15d. FRN from Previous Year:
16a. Billing Account Number:	16b. Multiple Billing Account Numbers?:
17. Allowable Contract Date: 01/03/2007	18. Contract Award Date: 01/05/2007
19a. Service Start Date: 07/01/2007	19b. Service End Date:
20. Contract Expiration Date: 06/30/2008	
21. Attachment #: MACK IS 3	22. Block 4 Entity Number: 58408
23a. Monthly Charges: \$457.21	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$457.21	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges ( 23c x 23d): \$5,486.52	
23f. Annual non-recurring (one-time) charges: 0	23g. Ineligible non-recurring amt.: 0
23h. Annual pre-discount amount for eligible non-recurring charges ( 23f - 23g): \$0.00	
23i. Total program year pre-discount amount ( 23e + 23h): \$5,486.52	
23j. % discount (from Block 4): 50	
23k. Funding Commitment Request ( 23i x 23j): \$2,743.26	

Block 6: Certifications and Signature

Do not write in this area.

Application ID: 562029

Entity Number	131684	Applicant's Form Identifier	MACK IS
---------------	--------	-----------------------------	---------

Contact Person **DR. ROGER SCHROCK** Phone Number **906-847-3377**

**Block 6: Certifications and Signature**

24.  I certify that the entities listed in Block 4 of this application are eligible for support because they are: (check one or both)
- a.  schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
  - b.  libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools including, but not limited to elementary, secondary schools, colleges, or universities
25.  I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed in this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

a.	Total funding year pre-discount amount on this Form 471 (Add the entities from Item 23I on all Block 5 Discount Funding Requests.)	\$33,260.65
b.	Total funding commitment request amount on this Form 471 (Add the entities from Items 23K on all Block 5 Discount Funding Requests.)	\$16,630.33
c.	Total applicant non-discount share (Subtract Item 25b from Item 25a.)	\$16,630.32
d.	Total budgeted amount allocated to resources not eligible for E-rate support	\$45,000.00
e.	Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resources necessary to make effective use of the discounts. (Add Items 25c and 25d.)	\$61,630.32
f.	<input type="checkbox"/> Check this box if you are receiving any of the funds in Item 25e directly from a service provider listed on any Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Items 25e.	

26.  I certify that all of the schools and libraries or library consortia listed in Block 4 of this application are covered by technology plans that are written, that cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, and an SLD-certified technology plan approver, prior to the commencement of service. The plans are written at the following level(s):
- a.  an individual technology plan for using the services requested in this application; and/or
  - b.  higher-level technology plan(s) for using the services requested in this application; or
  - c.  no technology plan needed; applying for basic local, cellular, PCS, and/or long distance telephone service and/or voice mail only.
27.  I certify that I posted my Form 470 and (if applicable) made my RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology plan goals.



28.  I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.
29.  I certify that the services the applicant 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, except as permitted by the Commission's rules at 47 C.F.R. Sec. 54.500(k). Additionally, I certify that the Billed Entity has not received anything of value or a promise of anything of value, other than services and equipment requested under this form, from the service provider(s) or any representative or agent



usable by people with disabilities.

**NOTICE:** Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public.

If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

**Please submit this form to:**

**SLD-Form 471  
P.O. Box 7026  
Lawrence, Kansas 66044-7026**

**For express delivery services or U.S. Postal Service, Return Receipt Requested,  
mail this form to:**

**SLD Forms  
ATTN: SLD Form 471  
3833 Greenway Drive  
Lawrence, Kansas 66046  
(888) 203-8100**

Print

Refresh Page

Close Print Preview

SHOW FORM FIGURE

Do not write in this area.

Application ID:562029

Entity Number	131684	Applicant's Form Identifier	MACK IS
Contact Person	DR. ROGER SCHROCK	Phone Number	906-847-3377

Block 6: Certifications and Signature

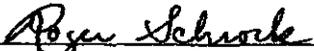
24.  I certify that the entities listed in Block 4 of this application are eligible for support because they are: (check one or both)
- a.  schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
  - b.  libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools including, but not limited to elementary, secondary schools, colleges, or universities
25.  I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed in this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

a.	Total funding year pre-discount amount on this Form 471 (Add the entities from Item 23f on all Block 5 Discount Funding Requests.)	\$33,260.65
b.	Total funding commitment request amount on this Form 471 (Add the entities from Items 23K on all Block 5 Discount Funding Requests.)	\$16,630.33
c.	Total applicant non-discount share (Subtract Item 25b from Item 25a.)	\$16,630.32
d.	Total budgeted amount allocated to resources not eligible for E-rate support	\$45,000.00
e.	Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resources necessary to make effective use of the discounts. (Add items 25c and 25d.)	\$61,630.32
f.	<input type="checkbox"/> Check this box if you are receiving any of the funds in Item 25e directly from a service provider listed on any Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Items 25e.	

26.  I certify that all of the schools and libraries or library consortia listed in Block 4 of this application are covered by technology plans that are written, that cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, and an SLD-certified technology plan approver, prior to the commencement of service. The plans are written at the following level(s):
- a.  an individual technology plan for using the services requested in this application; and/or
  - b.  higher-level technology plan(s) for using the services requested in this application; or
  - c.  no technology plan needed; applying for basic local, cellular, PCS, and/or long distance telephone service and/or voice mail only.
27.  I certify that I posted my Form 470 and (if applicable) made my RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology plan goals.



- 28.  I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.
- 29.  I certify that the services the applicant 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, except as permitted by the Commission's rules at 47 C.F.R. Sec. 54.500(k). Additionally, I certify that the Billed Entity has not received anything of value or a promise of anything of value, other than services and equipment requested under this form, from the service provider(s) or any representative or agent thereof or any consultant in connection with this request for services.
- 30.  I certify that I and the entity(ies) I represent have complied 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. There are signed contracts covering all of the services listed on this Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.
- 31.  I acknowledge 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.
- 32.  I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.
- 33.  I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of this program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under the Title 18 of the United States Code, 18 U.S.C. Sec. 1001 and civil violations of the False Claims Act.
- 34.  I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.
- 35.  I certify that if any of the Funding Requests on this Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the cost of the contract to eligible and ineligible companies as required by the Commission's rules at 47 C.F.R. Sec. 54.504(g)(1),(2).
- 36.  I certify that this funding request does not constitute a request for internal connections services, except basic maintenance services, in violation of the Commission requirement that eligible entities are not eligible for such support more than twice every five funding years beginning with Funding Year 2005 as required by the Commission's rules at 47 C.F.R. Sec. 54.506(c).
- 37.  I certify that the non-discounted portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services features on this Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

38. Signature of authorized person	39. Signature Date
	<u>2 Feb 07</u>
40. Printed name of authorized person	
DR ROGER SCHROCK	
41. Title or position of authorized person	
SUPERINTENDENT	
42a. Street Address, P.O Box or Route Number	
BOX 340 LAKESHORE DRIVE	
City, State Zip Code	
MACKINAC ISLAND, MI 49757	
42b. Telephone number of authorized person:	

(906) 847-3377

42c. Fax number of authorized person:  
(906) 847-3373

42d. E-mail of authorized person:  
rschrock@eup.k12.mi.us

42e. Name of authorized person's employer  
MACKINAC ISLAND PUBLIC SCHOOL

The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator, 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public.

If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

**Please submit this form to:**

**SLD-Form 471  
P.O. Box 7026  
Lawrence, Kansas 66044-7026**

**For express delivery services or U.S. Postal Service, Return Receipt Requested,  
mail this form to:**

**SLD Forms  
ATTN: SLD Form 471  
3833 Greenway Drive  
Lawrence, Kansas 66046**

**CONTRACT FOR DEDICATED INTERNET ACCESS FRN 155 0332**

**MACK IS**

This contract between the Eastern Upper Peninsula Intermediate School District and Mackinac Island School is for Dedicated Internet Access at speeds not to exceed 3mb/sec for the period of July 1, 2007 to June 30, 2008. This service will be delivered via a T1 line from a location dictated by the district to Lake Superior State University, where your traffic will be combined with traffic from other EUPISD customers for transport to the Internet. The EUPISD reserves the right to add other customers to the Customer Premise Equipment (CPD) that is located on the Districts site. The cost of this service is \$26,124.13 for the 2007/2008 school year payable in a single payment.

**DESCRIPTION OF SERVICE:**

Eastern Upper Peninsula Intermediate School Districts Dedicated Internet Access service provides an end-to-end leased service for basic conduit Internet access to the classroom or library. This service provides basic conduit Internet access only. The services include DNS, DHCP and E-Mail service for your site. No content or other functions are included as part of the service.

Where equipment is provided as part of the service. Per the FCC's Tennessee Decision (Order in CC Dockets 96-45 and 97-21, 99-216, 8/11/99), and administered by the SLD, this equipment is categorized as "on-premise equipment for end-to-end service." and complies with the following conditions:

- This equipment is directly related to the end-to-end provision of Internet Access from the Eastern Upper Peninsula Intermediate School District.
- The equipment is provided by the same SPIN that provides the associated Internet Access.
- Ownership of the equipment will not be transferred to Mackinac Island School in the future.
- The contract does not allow Mackinac Island School to purchase the equipment.
- Under this contract, the applicant does not have exclusive use of the equipment.
- The leased equipment at the applicant site will not be used for any purpose other than receipt of the eligible Internet Access of which it is a part.
- The applicant's internal data communications network functions without dependence on the equipment.
- EUPISD is responsible for maintaining the equipment provided as part of its Internet access services.

**Mackinac Island School agrees to the above terms and conditions.**

*Roger Schrock*  
**Dr. Roger Schrock, Superintendent**

5 Jan 07  
**Date**

*Michael R. Porter*  
**Michael R. Porter, Director of Technology**

1-5-07  
**Date**

4 11 11:03:17 a.m. 300 032 1120 P.11  
JUL 04 09 02-03-2007 6/12  
FRM 155 0351 11/11/07 +32

**Contract for Web Hosting to Mackinac Island Public School**

The EUPISD as a vendor of Internet services has been in operation for six years, providing Internet access and e-mail services to schools and non profits. It is our goal to provide advanced communications services at a price and service level that helps organizations meet internal and external needs.

This contract between the EUPISD and Mackinac Island Public School is for Web Hosting for the period of July 1, 2007 to June 30, 2008.

This service will be hosted on servers owned and operated by the EUPISD on the boundary between the customer network and the public Internet.

This service provides a means for Mackinac Island Public School to display content on the Internet.

Mackinac Island Public School will be provided with user-authenticated logins for each staff member under this contract.

This service can be tied to customer specific domain name, and DNS services will be provided.

Mackinac Island Public School will be allowed to create guest accounts on the web hosting system to provide content targeted to outside members of the community.

This service does not include any web site creation or maintenance of web sites by the EUPISD.

The EUPISD will not provide any additional content as part of this contract.

The cost for this service will be \$1,650 for the first site purchase, and \$1,250 for each additional sites purchased and managed by the same organization. It is recommended that Mackinac Island Public School purchase one site per building, or administrative unit within the organization at the cost of \$1,650.00 for the 2007-08 school year payable in a single payment.

**Mackinac Island Public School agrees to the above terms and conditions.**

*Roger Schrock*  
Dr. Roger Schrock, Superintendent

5 Jan 07  
Date

*Michael R. Porter*  
Michael R. Porter, Director of Technology

1-5-07  
Date

**Eastern Upper Peninsula ISD Spin number 143004465**

4 11 \* 569024  
FRN 1550382

**NETWORK MAINTENANCE CONTRACT**

Mack IS 3

This contract between the Eastern Upper Peninsula Intermediate School District and Mackinac Island School is for Network Maintenance for the period of July 1, 2007 to June 30, 2008.

**The EUPISD will provide the following:**

**Internal Connections Maintenance:**

- Install and maintain existing and future data electronics.
- Routine and emergency maintenance on servers, routers, hubs and switches.
- Maintain e-mail and proxy server for use by students and educators.
- Diagnose and repair /replace existing equipment with district approval.
- Provide advanced support of telephone switches in coordination with existing maintenance providers.
- Maintain district servers for Internet access in coordination with existing maintenance providers.

**EUPISD Performance Criteria:**

- The EUPISD will provide at least one full time Novell Certified CNE, within 100 miles of district office.
- The EUPISD agrees to provide staff familiar with district standard systems such as Novell Netware, Solaris, BSDI, Compaq and Cisco
- The EUPISD will provide 24-hour response time.
- The EUPISD will provide technical support via e-mail, phone, and WWW.

**District Responsibility:**

- District will pay, with prior approval, for all equipment charges needed for expansion.
- District will pay, with prior approval, for all equipment charges needed for repair.
- District will provide a single contact person for all district/vender interaction.
- District agree to abide by all EUPTC existing acceptable use policies and security issues, inherent in the maintenance of LANS and WANS.
- District agrees to develop and implement acceptable use policies internally.
- District agrees to investigate, punish and restrict users if violations to acceptable use policies are detected.
- The district agrees to abide by EUPTC standards for hubs, switches, router and servers to maintain consistency and ease of use.

**Cost:** Mackinac Island School agrees to pay \$5,486.54 for services from July 1, 2007 to June 30, 2008.

**Mackinac Island School agrees to the above terms and conditions.**

Roger Schrock  
Dr. Roger Schrock, Superintendent

5 Jan 07  
Date

Michael R. Porter  
Michael R. Porter, Director of Technology

1-5-07  
Date

①

Current Folder: **INBOX**

**Sign Out**  
**EUPISD**

[Compose](#) [Addresses](#) [Folders](#) [Options](#) [Search](#) [Help](#)

To: "Bennett, Dorothy" <DBENNET@sl.universalservice.org>

Cc:

Bcc:

Subject: Re: ERate App# 562029

Priority Normal    Receipt:  On Read  On Delivery

Ms. Bennett: As per our conversation of June 20, we have been advised by our ISD to request that you cancel our application for internal maintenance for the 2007-2008 school year. doc s. > Please see the attached.

>  
>  
>  
>  
>

> -----  
> Confidentiality Notice: The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is STRICTLY PROHIBITED.

Attach:

(max. 6 M)

Mackinac Island SD  
December 3, 2007  
**ATTACHMENT 3**



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

**FUNDING COMMITMENT DECISION LETTER**  
(Funding Year 2007: 07/01/2007 - 06/30/2008)

July 26, 2007

Jack Thompson  
Eastern Upper Peninsula Intermediate School District  
315 Armory Place  
P.O. Box 883  
Sault St. Marie, MI 49783

**Re: Service Provider Name: Eastern Upper Peninsula Intermediate School District**  
**Service Provider Identification Number: 143004465**

Thank you for participating in the Schools and Libraries Program (Program) for Funding Year 2007. This letter is your notification of our decision(s) regarding applications that listed your company's Service Provider Identification Number (SPIN) as providing service(s) for which discounts are being sought.

**NEXT STEPS**

- File Form 473, Service Provider Annual Certification Form (SPAC), for the current Funding Year
- Work with your customer to provide appropriate invoicing to USAC
- File Form 498, Service Provider Information Form, if appropriate
- Invoice the SLD - Service Provider Invoice (Form 474) or Billed Entity Applicant Reimbursement (Form 472)

Please refer to the Funding Commitment Report(s) (Report) following this letter for specific funding request decisions and explanations. Each Report contains detailed information extracted from the applicant's Form 471. A guide that provides a definition for each line of the Report is available in the Reference Area of our website.

Once you have reviewed this letter, we urge you to contact your customers to establish any necessary arrangements regarding start of services, billing of discounts, and any other administrative details for implementation of discount services. As a reminder, only eligible services delivered in accordance with Federal Communications Commission (FCC) rules are eligible for these discounts.

**TO APPEAL THIS DECISION:**

If you wish to appeal a decision in this letter, your appeal must be received by USAC or postmarked within 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 (if available) email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the decision letter and the decision you are appealing:
  - Appellant name,
  - Applicant or service provider name, if different from appellant,
  - Applicant Billed Entity Number (BEN) and Service Provider Identification Number (SPIN),
  - Form 471 Application Number as assigned by USAC,
  - "Funding Commitment Decision Letter for Funding Year 2007," AND
  - The exact text or the decision that you are appealing.
3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.

Schools and Libraries Division - Correspondence Unit,  
100 South Jefferson Road, P.O. Box 902, Whippany, New Jersey 07981  
Visit us online at [www.usac.org/sl](http://www.usac.org/sl)

Mackinac Island SD  
December 3, 2007  
ATTACHMENT 4

4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by the decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

To submit your appeal to USAC by email, email to [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org). USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us on paper, send your appeal to:

Letter of Appeal  
Schools and Libraries Division - Correspondence Unit  
100 South Jefferson Road  
P.O. Box 902  
Whippany, New Jersey 07981

You have the option of filing an appeal with the SLD or directly 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 by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted on our website. 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.

#### 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 Program. 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. USAC 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 USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly 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**

Service Provider Name: Eastern Upper Peninsula Intermediate School District  
SPIN: 143004465  
Funding Year: 2007

Name of Billed Entity: MACKINAC ISLAND SCHOOL DIST  
Billed Entity Address: BOX 340 LAKE SHORE DRIVE  
Billed Entity City: MACKINAC ISLAND  
Billed Entity State: MI  
Billed Entity Zip Code: 49757  
Billed Entity Number: 131684  
Contact Person's Name: DR ROGER SCHROCK  
Preferred Mode of Contact: EMAIL  
Contact Information: rschrock@up.k12.mi.us  
Form 471 Application Number: 562029  
Funding Request Number: 1550332  
Funding Status: Not Funded  
Category of Service: Internet Access  
Site Identifier: 26 22230 05938  
Form 470 Application Number: 128690000602662  
Contract Number: NA  
Billing Account Number: N/A  
Service Start Date: 07/01/2007  
Contract Expiration Date: 06/30/2008  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-Discount Amount for Eligible Recurring Charges: \$0.00  
Annual Pre-Discount Amount for Eligible Non-Recurring Charges: \$26124.13  
Pre-Discount Amount: \$26124.13  
Applicant's Discount Percentage Approved by SLD: 50  
Funding Commitment Decision: \$0.00 - Applicant request  
Funding Commitment Decision Explanation: CR1: FRN canceled in consultation with the applicant.  
FCDL Date: 07/26/2007  
Wave Number: 012  
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

**FUNDING COMMITMENT REPORT**

**Service Provider Name: Eastern Upper Peninsula Intermediate School District**  
**SPIN: 143004465**  
**Funding Year: 2007**

**Name of Billed Entity: MACKINAC ISLAND SCHOOL DIST**  
**Billed Entity Address: BOX 340 LAKE SHORE DRIVE**  
**Billed Entity City: MACKINAC ISLAND**  
**Billed Entity State: MI**  
**Billed Entity Zip Code: 49757**  
**Billed Entity Number: 131684**  
**Contact Person's Name: DR ROGER SCHROCK**  
**Preferred Mode of Contact: EMAIL**  
**Contact Information: rschrock@eup.k12.mi.us**  
**Form 471 Application Number: 562029**  
**Funding Request Number: 1550351**  
**Funding Status: Not Funded**  
**Category of Service: Internet Access**  
**Site Identifier: 26 22230 05938**  
**Form 470 Application Number: 128690000602662**  
**Contract Number: NA**  
**Billing Account Number: N/A**  
**Service Start Date: 07/01/2007**  
**Contract Expiration Date: 06/30/2008**  
**Number of Months Recurring Service Provided in Funding Year: 12**  
**Annual Pre-Discount Amount for Eligible Recurring Charges: \$0.00**  
**Annual Pre-Discount Amount for Eligible Non-Recurring Charges: \$1650.00**  
**Pre-Discount Amount: \$1650.00**  
**Applicant's Discount Percentage Approved by SLD: 50**  
**Funding Commitment Decision: \$0.00 - Applicant request**  
**Funding Commitment Decision Explanation: CRI: FRN canceled in consultation with the applicant.**

**FCDL Date: 07/26/2007**

**Wave Number: 012**

**Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008**

**FUNDING COMMITMENT REPORT**

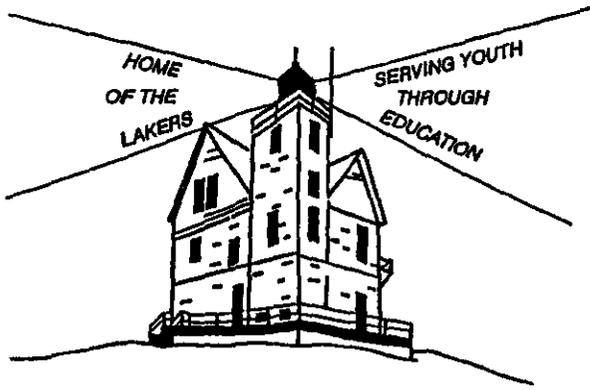
**Service Provider Name: Eastern Upper Peninsula Intermediate School District**  
**SPIN: 143004465**  
**Funding Year: 2007**

**Name of Billed Entity: MACKINAC ISLAND SCHOOL DIST**  
**Billed Entity Address: BOX 340 LAKE SHORE DRIVE**  
**Billed Entity City: MACKINAC ISLAND**  
**Billed Entity State: MI**  
**Billed Entity Zip Code: 49757**  
**Billed Entity Number: 131684**  
**Contact Person's Name: DR ROGER SCHROCK**  
**Preferred Mode of Contact: EMAIL**  
**Contact Information: rschrock@eup.k12.mi.us**  
**Form 471 Application Number: 562029**  
**Funding Request Number: 1550382**  
**Funding Status: Not Funded**  
**Category of Service: Basic Maintenance of Internal Connection**  
**Site Identifier: 26 22230 05938**  
**Form 470 Application Number: 128690000602662**  
**Contract Number: NA**  
**Billing Account Number: N/A**  
**Service Start Date: 07/01/2007**  
**Contract Expiration Date: 06/30/2008**  
**Number of Months Recurring Service Provided in Funding Year: 12**  
**Annual Pre-Discount Amount for Eligible Recurring Charges: \$5486.52**  
**Annual Pre-Discount Amount for Eligible Non-Recurring Charges: \$0.00**  
**Pre-Discount Amount: \$5486.52**  
**Applicant's Discount Percentage Approved by SLD: 50**  
**Funding Commitment Decision: \$0.00 - Applicant request**  
**Funding Commitment Decision Explanation: CRI: FRN canceled in consultation with the applicant.**

**FCDL Date: 07/26/2007**

**Wave Number: 012**

**Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008**



# Mackinac Island Public School

P.O. Box 340, Lake Shore Drive  
Mackinac Island, MI 49757-0340

Phone (906) 847-3376  
Fax (906) 847-3773

September 26, 2007

Letter of APPEAL  
Schools and Libraries Division  
Box 125 – Correspondence Unit  
80 South Jefferson Road  
Whippany, New Jersey 07981

To Whom it May Concern:

This is a letter of Appeal, not a general inquiry. This letter is for Application Name – Mackinac Island School District, Billed Entity Number – 131702. This appeal is for the cancellation of application 562029.

On June 20, 2007 I spoke with Ms. Bennett the PIA reviewer for several Mackinac Island applications about application 562029. After several attempts to satisfy the repeated questions from Ms Bennett regarding the Maintenance of our Internal Connections I asked Ms. Bennett to just cancel this FRN. Our district is only a 50% discount district, with the likelihood of funding very slim, and we deemed the amount of work to satisfy Ms Bennet unacceptable. We asked Ms Bennett to cancel this single FRN. I followed this conversation with an e-mail message on June 21, 2007 confirming my intention of canceling this single FRN.

Subsequent to this request Ms. Bennett canceled the entire application including the FRN's for Internet and Web Hosting.

In this appeal we respectfully request that application #562029 including FRN 1550332 and FRN 1550351 for Internet and Web Hosting be reinstated and fully funded at the approved district discount rate, based on an administrative error by Ms. Bennett

Sincerely

Dr. Roger S. Schrock  
Superintendent

Mackinac Island SD  
December 3, 2007  
ATTACHMENT 5



Universal Service Administrative Company

Schools and Libraries Division

**Administrator's Appeal Acknowledgement Letter**  
(Funding Year 2007: 07/01/07-06/30/08)

October 4, 2007

Dr. Roger Schrock  
Mackinac Island Public School  
P. O. Box 340 - Lake Shore Drive  
Mackinac Island, MI 49757-0340

Subject: Mackinac Island Public School

Dr. Roger Schrock,

Universal Service Administrative Company has received your correspondence dated September 26, 2007, on September 28, 2007 regarding the 2007 funding decision of your Form 471 Application Number 562029.

These are the steps that will now follow:

1. We will review your correspondence carefully to identify the specific issue(s) it raises.
2. We will consult the Program Integrity Assurance records and all supporting documentation for the application. Our goal is to determine whether the program rules were administered appropriately in processing your application.
3. Once the review process is completed we will respond in writing and state whether your appeal is approved, denied or approved in part. A Revised Funding Commitment Decision Letter will follow for any approved appeal resulting in additional discounts for your application. Funds have been set aside to implement funding decisions for appeals approved by the SLD and/or the Federal Communications Commission.

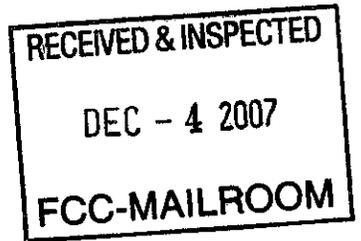
We will perform an in-depth review of your appeal. Our goal is to respond to you as promptly as possible. We thank you in advance for your patience as we handle your appeal with the care and attention it deserves.

Universal Service Administrative Company

100 South Jefferson Road, P.O. Box 902, Whippany, New Jersey 07981

Visit us online at: <http://www.usac.org/sl/>

Mackinac Island SD  
December 3, 2007  
ATTACHMENT 6



December 3, 2007

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

Re: E-Rate Waiver Request, Mackinac Island School District

Dear Ms. Dortch:

Enclosed is a Waiver Request filed on behalf of the Mackinac Island School District from a Universal Service Administrative Company Administrator's Decision on Appeal dated October 5, 2007.

Also enclosed is a Letter of Agency providing authorization for our firm to represent Mackinac Island School District in this appeal.

If you have any questions, please contact me at 906.265.4410.

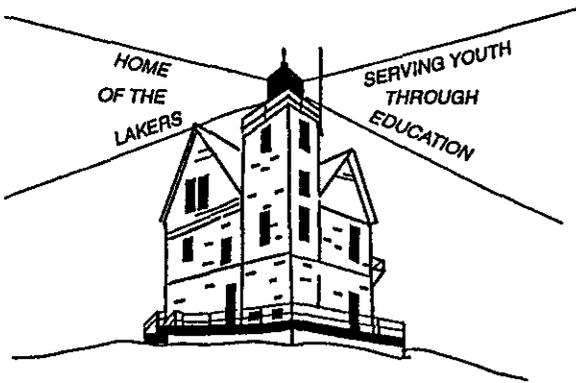
Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Ronald M. Basso".

Ronald M. Basso

Enclosures

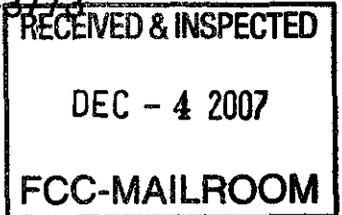


# *Mackinac Island Public School*

P.O. Box 340, Lake Shore Drive  
Mackinac Island, MI 49757-0340

Phone (906) 847-3376

Fax (906) 847-3773



November 12, 2007

Ronald M. Basso  
Basso & Basso Legal Services  
PO Box 63  
Iron River, MI 49935

Re: Letter of Agency

Dear Mr. Basso:

This communication authorizes you to represent the Mackinac Island School District in order to file an appeal with the Federal Communications Commission regarding the USAC's Administrator's Decision on Appeal dated October 5, 2007.

The Appeal concerns Form 471 application number 562029, funding request numbers 1550332, 1550351 and 1550382.

Thank you for your agreement to perform the above services.

Sincerely,

Dr. Roger S. Schrock  
Superintendent