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Federal Communications Commission
Office of the Secretary

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CC: 02-6

April 10, 2009

Paul C. Besozzi
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BY ELECTRONIC MAIL

Ms. Jennifer McKee
Acting Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Integrity Communications, Ltd.

Dear Jennifer,

Once again, thanks to you and your colleagues for recently devoting substantial time to discussing the path to resolution of certain pending matters relating to Integrity Communications, Ltd.

As a follow up to that meeting and discussion I enclose a letter from Integrity outlining its current E-rate program procedures, including invoicing. Integrity sincerely hopes that this submission will be the basis for the prompt (a) lifting of the freeze imposed by USAC in October of 2007 on the processing of all applications specifying Integrity's SPIN and (b) the payment of all outstanding invoices for services rendered which are pending at USAC.

I would note that nothing has changed with respect to the impact on Integrity as described by Mr. Sugarek of this ongoing freeze and non-payment. This is a matter in which time is of the essence and I anticipate following up with you next week.

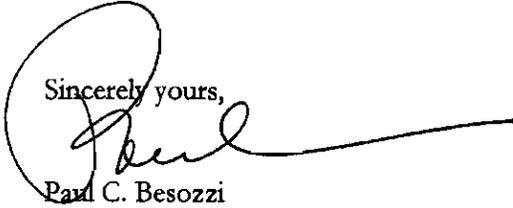
I have simultaneously provided a copy of this letter and attachment to USAC representatives with whom Integrity has previously dealt with on this matter.

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MIA B O E

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If there are any questions or other information required, please let me know immediately.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Paul", with a long horizontal flourish extending to the right. The signature is written over the text "Sincerely yours," and "Paul C. Besozzi".

Paul C. Besozzi

cc: Gina Spade
Anita Cheng
Alexander Minard
Kristy Carroll
Brian Murphy
Bill Sugarek
Charlotte Smith

April 10, 2009

Universal Service Administrative Company
2000 L Street, N. W., Suite 200
Washington, DC 20036

To Whom It May Concern,

Integrity Communications, Ltd. continually strives to be in full compliance with FCC Rules and Regulations and with USAC Policies and Procedures. Below you will see what our internal policies are for remaining compliant.

We attend USAC annual training seminars and strive to monitor constant changes in policy by USAC and the FCC. Based on information obtained by these means we are continually updating our procedures with the intent to remain in compliance.

Integrity Communications, Ltd.'s current internal operating procedures and protocol for dealing with E-Rate invoicing procedures are as follows:

- A legally binding agreement or contract between the applicant (our customer) and Integrity is required prior to the filing of the Form 471.
- The school must file an FCC Form 486 with USAC prior to Integrity issuing an invoice to the school and to USAC.
- Integrity files an FCC Form 473 annually before invoicing USAC.
- Services are rendered.
- The school requests an invoice to our Accounts Receivable Department by the Project Manager upon agreement from the school district.
- Integrity issues an invoice to the school prior to issuing an invoice to USAC.
- Each invoice has the FRN# and Item 21 Attachment details and prices attached or referenced.
- We insure the appropriate personnel sign and send the "Service Certification" to USAC per USAC policy.

Records of transactions are kept in SMP Accounting Software for future reference.

- All invoices state payment due upon receipt, and we stress the importance for districts to make payment within the 90 days per FCC policy.
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- Payments received from schools and USAC are recorded in SMP and our accounting software.
- Upon full completion of a project or FRN, that FRN is closed out and recorded as satisfactorily completed.
- Hard copies of all transactions are filed according to each individual school district.
- We save all documents for a minimum of 5 years.

As program rules, policies, and procedures are constantly changing from USAC we strive to understand and interpret requirements and make adjustments to our internal policies and procedures to remain compliant.

Our ultimate goal is to provide the schools and under privileged children the much needed services requested and at the same time to be compliant with the FCC Rules and Regulations as well as the USAC Policies and Procedures to enable satisfactory compliance.

Sincerely,



Bill Sugarek
CEO, Integrity Communications, Ltd.