



City of Anaheim
COMMUNITY SERVICES DEPARTMENT

Anaheim Public Library

September 1, 2009

Received & Inspected

SEP 10 2009

FCC Mail Room

FCC, Office of the Secretary
445 12th Street SW
Washington DC 20554

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review
Applicant Name/Billed Entity Name: Anaheim Public Library
Billed Entity Number: 143737
FCC Registration Number: 0013407721
FCC Case Number: CIMS00002187036
471 Application Number: 520930
Funding Request Number: 1434000
CC Docket No: 02-6
Notification of Commitment Adjustment Letter: February 11, 2009

Dear Secretary of the FCC,

The enclosed is an Amendment to the Request for Review /Letter of Appeal submitted to the FCC on May 20, 2009 concerning the above described Notification of Commitment Adjustment.

Background:

On June 18, 2009 Thomas Edelblute, the City of Anaheim Public Library Public Access Systems Coordinator sent a letter to the FCC as notice that the Anaheim Public Library intended to file an Amendment to its May 20, 2009 Letter of Appeal within 90 days. The Library's Amendment is based on new information discovered after meeting with USAC representatives Andrew Eisley and David Lenard.

On June 10, 2009, USAC representatives Andrew Eisley and David Lenard visited the Anaheim Public Library to discuss the Library's current E-rate history and recommend practices that would ensure successful E-rate applications in the future. At this meeting, Mr. Eisley and Mr. Lenard reviewed our May 20, 2009 Letter of Appeal to the FCC. They recommended that the Library file an Amendment to the Letter of Appeal to elaborate upon the circumstances under which the instances of noncompliance cited in the auditor's findings occurred and submit any supporting documentation as evidence of good faith, especially as it pertained to the Library's 2005 Technology Plan.

500 West Broadway
Anaheim, California 92805
TEL (714) 765-1880
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List ABCDE

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review
Applicant Name/Billed Entity Name: Anaheim Public Library
Page 2

Amendment to Appeal and Request for Review:

The Amendment concerns the USAC Adjustment Letter which corresponds to Auditors findings and the City Library's responses thereto.

This Amendment provides affidavits and supporting documentation concerning the following:

Auditors Finding SL2007BE082_F01:

"[T]he technology plan for this entity was not approved at the time of submission of the Form 486."

and

Auditors Finding SL2007BE082_F03:

"The Library installed equipment purchased under the Schools and Libraries program after the cut-off date for Priority 2 services". The applicant did not timely file for a service delivery extension.

The Anaheim Public Library's Amendment as to the first finding provides affidavits and supporting documents which further support the Anaheim Library's initial explanation and response that it submitted a technology plan before submitting its form 470 and had every reason to believe that its Technology Plan was in accord with the State Library's approval standards and had been approved by the State when the Anaheim Library submitted its form 486.

Thus, the substantive requirement that the Library obtain and use the program funds in accord with the State Library's standards was adhered to and any noncompliance by the Library was more in the realm of a procedural defect.

The Library's Amendment as to the second finding provides affidavits and documentation which reflect that the auditor's finding was premised on erroneous information that was inadvertently given to the Auditor and should be corrected.

The enclosed submission lends further credence and support for the Library's good faith position that the Anaheim Public Library did not commit any waste, fraud or abuse in the course of any of the noted deficiencies. All of the disbursed funds have been properly allocated to provide the services identified in the grant applications and the 2005 Technology Plan.

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review
Applicant Name/Billed Entity Name: Anaheim Public Library
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The enclosed Amendment consists of The Index of Attachments/Exhibits to this Amendment to the Appeal, the May 20, 2009 Letter of Appeal/Request for Review, affidavits from Anaheim Public Library staff as well as from the California State Library and supporting documentation, including the Anaheim Library's 2005 Technology Plan. We believe that the enclosed affidavits and documentation provide a more detailed explanation concerning Findings #1 and #2 and strong support for the Anaheim Library's request that it be permitted to retain the disbursed funds.

The Anaheim Public Library respectfully requests that the FCC waive its relevant rules in these matters, particularly where, as here, the compliance issues tend to be more procedural in nature. As the FCC has noted in the Bishop Perry Order (21 FCC Rcd 5316), strict adherence to such procedures does not always promote e-rate program goals. On balance, permitting the Anaheim Public Library to retain the funds is more likely to ensure that the public interest in the delivery of advanced telecommunications services to its expanding population will continue to be served.

Thank you for your consideration of our Amendment to the original May 20, 2009 Letter of Appeal/Request for Review.

For any questions regarding the attached documentation please contact:

Thomas Edelblute, Public Access Systems Coordinator
Anaheim Public Library
500 West Broadway
Anaheim CA 92805
Phone: 714-765-1759, Facsimile: 714-765-1730
e-mail: tedelblute@anaheim.net

Sincerely,



Carol Stone
City Librarian

**AMENDMENT TO THE MAY 20, 2009 LETTER OF APPEAL/REQUEST FOR
REVIEW**

INDEX OF ATTACHMENTS/EXHIBITS

RE: AUDITORS FINDING SL2007BE082 F01

“THE TECHNOLOGY PLAN FOR THIS ENTITY WAS NOT APPROVED AT THE TIME OF SUBMISSION OF THE FORM 486.”

1. AFFIDAVIT OF THOMAS EDELBLUTE
2. COPY OF THE ANAHEIM TECHNOLOGY PLAN
3. AFFIDAVIT OF RUSHTON BRANDIS
4. AFFIDAVIT OF THERESA GOGGIN

RE: AUDITORS FINDING SL2007BE082 F03

“THE LIBRARY INSTALLED EQUIPMENT PURCHASED UNDER THE SCHOOLS AND LIBRARIES PROGRAM AFTER THE CUT-OFF DATE FOR PRIORITY 2 SERVICES. THE APPLICANT DID NOT TIMELY FILE FOR A SERVICE DELIVERY EXTENSION. ”

5. AFFIDAVIT OF KAREN GERTH
6. EDS MONTH END REPORT PAGE 4 OF 13
7. EDS COMPUTER SCREEN SHOT
8. E-MAIL FROM DANIEL VILLALOBOS, OF D4 SOLUTIONS
RE: DATE FIBER WAS PULLED TO THE SWITCHES
9. MAY 20, 2009 LETTER OF APPEAL/REQUEST FOR REVIEW

Exhibit 1

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review

Applicant Name/Billed Entity Name: Anaheim Public Library

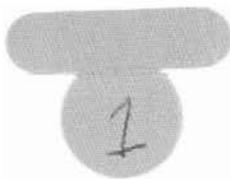
Billed Entity Number: 143737

FCC Registration Number: 0013407721

FCC Case Number: CIMS00002187036

I, Thomas Edelblute, declare the following facts to be within my own personal knowledge:

1. I have been employed by the Anaheim Community Services Department Library Division since December 28, 1998 as the Reference and Technology Librarian. On February 2, 2001 I was promoted to Library Public Access Systems Coordinator, which is the position I currently hold.
2. During the Summer of 2005, I worked with Library Management to create a three year technology plan for the Anaheim Public Library. My participation in this project included submission of the Technology Plan to the California State Library as the Library's official Technology Plan, in compliance with e-rate eligibility requirements.
3. On or about August 31, 2005 I caused the Library's Official Technology Plan document to be submitted to the California State Library when I instructed Theresa Goggin, the senior secretary at that time, to have Carol Stone, the City Librarian, sign the final version of the document for the California State Library, make copies of the signed document for her files and mine and to send two copies of the Technology Plan to the California State Library. A



copy of the technology plan that was mailed by Ms. Goggin under my direction on or about August 31, 2005 is attached hereto as Exhibit 2 to this Amendment to the May 20, 2009 Letter of Appeal/Request for Review.

4. At all times I have held a good faith belief that Ms. Goggin complied with my instructions and that she indeed mailed the 2005 Technology Plan to the State Library. This is the same practice we have followed at the library for other documents of this nature.
5. Ms. Goggin had demonstrated more than average competence in executing these duties as assigned.
6. I have maintained a copy of the signed 2005 Library Technology Plan in my files since I caused it to be submitted to the California State Library on August 31, 2005.

I declare under penalty of perjury of the laws of California that the foregoing facts are true and correct and that I could and would testify to those facts in court.

Signed this 19 day of July , 2009 at [Anaheim], California



DECLARANT, Thomas Edelblute, Public Access Systems Coordinator

Exhibit 2

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review
Applicant Name/Billed Entity Name: Anaheim Public Library
Billed Entity Number: 143737
FCC Registration Number: 0013407721
FCC Case Number: CIMS00002187036

California State Library

E-Rate Library Technology Plan

**THREE YEAR LIBRARY TECHNOLOGY PLAN
FOR THE E-RATE PROGRAM
Instructions**

Eligibility

Public, school and special libraries in California are eligible for the Federal E-Rate program if they meet the eligibility requirements for the Library Services and Technology (LSTA) grant program administered in California by the State Librarian.

These are:

- A written explicit mission statement and service objectives.
- A fixed location in California.
- Established hours of service.
- An organized collection of information and materials accessible for use by its primary clientele.
- Designated, onsite, paid staff for library services. At least one staff person shall have a master's degree in library or information science or a California library media teacher credential issued by the Commission on Teacher Credentialing
- An established funding base.

Applicants for the E-Rate program must meet these requirements. Your authorized signature in the application signifies that you meet all the above criteria. Please contact Rushton Brandis (916) 653-5471, or rbrandis@library.ca.gov for any questions about eligibility.

Application Form

Complete all information for all sections. Space may be added as needed. Submit two copies, one with original signature, by mail or delivery service only (no fax)

Return to: Rushton Brandis/Library Technology Plans
 Library Development Services
 California State Library
 P.O. Box 942837
 Sacramento, CA 94237-0001

Forms sent via express delivery should come to: 900 N Street, Room 500, Sacramento, CA 95814



USAC Schools and Libraries Division Policies and Procedures for Technology Plans

(see: <http://www.sl.universalservice.org/apply/step2.asp> for complete text and additional information)

The Federal Communications Commission (FCC), recognized the necessity of thoughtful preparations for the use of these new technologies when they stipulated that requests for Universal Service Program discounts must be based on an approved technology plan [Section 254(h)(1)(B), of the Telecommunications Act of 1996, and FCC Order 97-157, Paragraph 573]. To ensure that schools and libraries are prepared to use the requested services effectively, and to make certain that students and community members experience the real benefits of the Universal Service Program, applicants must certify that their requests are based on approved technology plans that include provisions for integrating telecommunication services and Internet access into their educational program or library services. Most schools and libraries have already developed such plans and may only need to modify these existing plans slightly to conform with E-rate program technology plan criteria.

To qualify as an approved Technology Plan for a Universal Service discount, the plan must meet the following five criteria that are core elements of successful school and library technology initiatives:

1. The plan must establish clear goals and a realistic strategy for using telecommunications and information technology to improve education or library services;
2. The plan must have a professional development strategy to ensure that staff know how to use these new technologies to improve education or library services;
3. The plan must include an assessment of the telecommunication services, hardware, software, and other services that will be needed to improve education or library services;
4. The plan must provide for a sufficient budget to acquire and support the non-discounted elements of the plan: the hardware, software, professional development, and other services that will be needed to implement the strategy; and
5. The plan must include an evaluation process that enables the school or library to monitor progress toward the specified goals and make mid-course corrections in response to new developments and opportunities as they arise.

Successful plans align these five criteria with the overall education or library service improvement objectives of states, districts, and local schools or libraries. It is critical that technology planning not be viewed or treated as a separate exercise dealing primarily with hardware and telecommunications infrastructure. There must be strong connections between the proposed physical infrastructure of the information technology and the plan for professional development, curriculum reform, and library service improvements.

**THREE YEAR LIBRARY TECHNOLOGY PLAN
FOR THE E-RATE PROGRAM**

Date: August 31, 2005

Library Jurisdiction: City of Anaheim

Address: 500 West Broadway,

Anaheim, CA 92805

Authorized Signature: 

Please Print Name: Carol Stone

Title: City Librarian

Telephone: (714) 765-1810 FAX: (714) 765-1730

E-Mail: cstone@anaheim.net

1. LIBRARY MISSION STATEMENT AND GOALS

The Anaheim Public Library Mission Statement reads as follows:

To promote literacy, support learning, foster community, and enhance quality of life for a diverse population.

2. CURRENT TECHNOLOGY OVERVIEW

Summarize the current use of technology to accomplish the library's mission and goals.

The Anaheim Public Library has approximately 300 computing devices over four locations plus a mobile bookmobile, with a second bookmobile and two more branches coming on line within the next 12-months. These devices include servers, switches, staff computers, and public access computers. The public access computers are divided into four distinct functional units: (1) Internet access with word processing, (2) library catalog and subscription databases, (3) Microsoft Office and other productivity software without Internet, and (4) children's educational software. In the computer lab, introduction to the Internet, introductory word processing and e-mail classes are offered monthly to the public in English and Spanish.

Have you done a Technology Inventory / Assessment in the past year? X Yes

Budget Summary

Use the following budget summary or insert/attach your own budget summary if available. Be certain to identify those costs dependent on the E-rate program and those paid from local or other funds.

<u>TOTAL ESTIMATED COSTS</u>	
A. Estimated current annual cost	<u>\$578,297.00</u>
B. Estimated one-time cost of additions	<u>\$260,000.00</u>
C. Estimated annual cost, with additions	<u>\$828,297.00</u>
D. Estimated annual costs (C.) dependent on E-rate	<u>\$239,197.20</u>
E. Estimated annual costs (C.) dependent on local funds	<u>\$599,099.80</u>

3. TECHNOLOGY PLAN

Briefly describe your strategy for using information technologies to integrate, support or extend services and/or to assure an efficiently and effectively managed organization in the future.

Over the next three to five years, the Anaheim Public Library's technology plan includes:

- Building computer homework centers in all locations for all educational levels.
- Networked software to all locations.
- Creating video conferencing capabilities at the Haskett branch library.
- Connecting of all library facilities to fiber optic cable.
- Working with the City to include Voice over IP telephony at all locations.
- Creating a video production lab for school projects.
- Installing a storage server to broadcast library story time to the schools over the Internet.
- Replacing outdated network equipment to upgrade network infrastructure.
- Expanding download options for public.
- Improving Bookmobile connectivity with City wireless.
- Expanding public wireless to all branch facilities.

4. TELECOMMUNICATIONS SERVICES

Describe the telephone and data services you have and that you will need over the next 3-5 years.

The City of Anaheim has a mixture of digital and analog phone lines. Over the next two years, the City will replace this mixture with a Voice over IP (VoIP) telephone network. All Anaheim Library facilities are included in the plan for upgrading the telephone infrastructure to this VoIP system.

A conference room with Video Conferencing is planned for the Haskett library that's scheduled to open in the Spring of 2006. Since we plan to make these services available for public rental, it has not been decided if ISDN lines will be used or if it will utilize the City's Internet connection for an IP based video conferencing system.

5. HARDWARE AND SOFTWARE PRODUCTS

Describe the telecommunications hardware and software you have and that you will need over the next 3-5 years.

- All outdated networking hardware needs to be replaced to upgrade the network, because the existing set of routing equipment is no longer supported by the vendor.
- High speed data cable needs to be installed during all renovation and expansion projects.
- At this time, Central library is the only facility connected to the City's fiber optic cable network. The Library Automation Team is working with Public Utilities to connect all remaining locations.
- New network connectivity hardware and software is required for the fiber optic cable connections.
- New telephone equipment and software is required for the implementation and management of Voice over IP telephony.

6. NETWORK CONNECTIONS AND INTERNET SERVICES

Describe the status of network connectivity (LAN/WAN) that you have and that you will need over the next 3-5 years. Describe your current level of Internet service and what you will need over the next 3-5 years.

The Local Area Network connectivity contains category 5 or 6 data cable in all buildings. As of 2004, all data installations are category 6 cable. The library is also planning to use category 6 cable for the VoIP telephone equipment.

For the Wide Area Network connectivity, all branch libraries connect to the City using T-1 lines, with the Central Library providing access to the City via fiber optic cable. It is part of the City's plan to connect all locations with fiber optic cable making the T-1 line expense unnecessary.

The library provides Internet service through the City's Information Technology department. At present this is a 10 Mbps connection from City Hall to the ISP. The City plans to upgrade this connection to 100 Mbps.

7. STAFF DEVELOPMENT

Describe the level of staff development you have and that you will need over the next 3-5 years.

Training for new technologies is written into the purchase agreements and contracts with the vendors. In addition, library staff members attend training available at local library conferences and webcasts available over the Internet. In the future, additional training may become available via video conferencing. The automation on team provides training to library staff as needed when upgrades occur.

8. SUPPORT

Describe the level of staff and/or vendor support for technology you have and that you will need over the next 3-5 years.

The Library Services Manager oversees the Library Automation Team. The staffing of that Automation Team includes:

- One member of the City of Anaheim networking and server teams. This person utilizes additional support from the City of Anaheim IT department.
- One Public Access Systems Coordinator. This person is a librarian with multiple computer certifications and regularly addresses client/server issues. For additional resources he has access to library technology lists and library publications.
- Two part time System Specialists who field the bulk of the daily problems at all locations. An additional System Specialist may be hired if/when the library expands from a six day/week operation to a seven day/week operation.

In addition, the library maintains a collection of support contracts for hardware and software on major systems. Funding for the bulleted positions and the contracts is included in line A of the Total Estimated Costs section of this report.

9. PLAN REVIEW AND UPDATING

Describe the process for reviewing and updating your technology plan on a periodic basis.

During the fiscal year, the Library Services Manager and Public Access Systems Coordinator keeps a task list of all action projects to make sure tasks stay on track. Other items are added to the list just so they are not forgotten about, and can be acted upon when the appropriate time comes.

The library automation team and library management review the technology needs each year during the budgeting planning for the following fiscal year. This helps ensure that important items are included in the annual budget.

Exhibit 3

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review

Applicant Name/Billed Entity Name: Anaheim Public Library

Billed Entity Number: 143737

FCC Registration Number: 0013407721

FCC Case Number: CIMS00002187036



Affidavit of Rushton Brandis

I, Rushton Brandis, declare the following to be true based on my own knowledge and belief:

1. I have worked as a Programs Consultant for the California State Library since June 10, 2002;
2. I have been the E-Rate coordinator for the California State Library responsible for certifying E-Rate technology plans prepared and submitted by public library jurisdictions to the California State Library since December, 2002;
3. The California State Library did not receive an E-Rate technology plan from the Anaheim Public Library in 2005;
4. On February 7, 2008, Mr. Thomas Edelblute of the Anaheim Public Library provided me with a copy of an E-Rate technology plan from the Anaheim Public Library dated 2005;
5. On February 7, 2008, I informed Mr. Edelblute that the E-Rate technology plan dated 2005 that he provided to me on February 7, 2008, met the requirements of an E-Rate technology plan, and that had the plan been submitted in a timely fashion in 2005, it would have been certified by the California State Library.

I, Rushton Brandis, declare under penalty of perjury according to the laws of the State of California that the foregoing facts are true to the best of my knowledge and belief.

By:

Date: August 5, 2009

At: Sacramento, California

Rushton Brandis
Programs Consultant
California State Library

Exhibit 4

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review

Applicant Name/Billed Entity Name: Anaheim Public Library

Billed Entity Number: 143737

FCC Registration Number: 0013407721

FCC Case Number: CIMS00002187036

I Theresa Goggin, declare the following facts to be within my own personal knowledge:

1. I was employed by the Anaheim Community Services Department Library Division as Senior Secretary for the Anaheim Public Library from October 31, 1997 to June 28, 2007.

2. On or about August 31, 2005 as part of my ordinary duties during my employment as senior secretary I mailed the 2005 Technology Plan which is attached here to as Exhibit A, to the California State Library.

3. During my tenure there as senior secretary, it was the Library Division's standard practice for mailing items via the U.S. Postal Service to place the mail in the Library Division's outgoing postal mailbox on the date it was processed (signed, copied, and put into an envelope to the addressee). This mail is picked up by a contracted delivery service for the City of Anaheim, usually on the following day. The mail is then taken and posted in the mail room of City Hall and picked up by the U.S. Postal Service at the end of each day that it is picked up.

4. After I mailed the Technology plan to the State Library, I subsequently placed a copy of the 2005 Technology Plan in the Senior Secretary's Office files in Administration.

I declare under penalty of perjury of the laws of California that the foregoing facts are true and correct and that I could and would testify to those facts in court.

Signed this 22 day of July , 2009 at [Anaheim], California

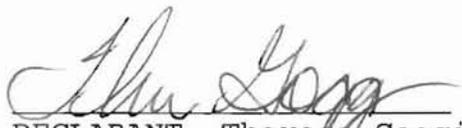

DECLARANT, Theresa Goggin

Exhibit 5

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review

Applicant Name/Billed Entity Name: Anaheim Public Library

Billed Entity Number: 143737

FCC Registration Number: 0013407721

FCC Case Number: CIMS00002187036

I, Karen Gerth, declare the following facts to be within my own personal knowledge:

1. I have been employed by the Anaheim Community Services Department Library Division since March 2004 as the User Support Services Manager. My job responsibilities include managing the Library's Automation and Technology work unit.

2. In February of 2008, auditors from Moss-Adams, LLP conducted an audit for USAC of e-rate funds received by the Library as reimbursement for hardware purchased and installed at the Central Library in 2007.

3. Library's Automation and Technology staff provided information which, I am informed and believe, included erroneous dates to the auditors regarding hardware installation. Based on this erroneous information, the auditors reported to USAC that the Library was not in compliance because the hardware was not installed by September 30th of the relevant funding year (2007) and the Library failed to request an extension.

4. In response to the 2008 audit findings, the Library conceded that it had not requested an extension, believing

that an extension was not necessary, since the installation was not funded with erate monies nor was the hardware vendor responsible for installation. Moreover, the Library responded that it was suddenly subjected to a three week evacuation of its premises in late August 2007 which prevented entry into the building and delayed the hardware installation.

5. These facts were reiterated and expounded upon in the Library's April 1, 2009 appeal of the USAC's findings and the recovery of funds letter the Library received on February 4, 2009.

6. I have subsequently been informed and now believe that the auditor's findings and thus USAC's determination is based on erroneous information for the following reasons:

7. I began my own research into the Central Library construction project and the dates and timing surrounding the Library's installation of the hardware, upon the recommendation of USAC staff members Andrew Eisley and David Lenard, on June 10, 2009 that the Anaheim Library file an amendment to its May 20, 2009 appeal. I learned that the hardware was, in fact, installed prior to

September 30, 2007, of the relevant funding year, thus the Library did not need to file an extension.

8. I obtained this information from documents and technical information given to the Library from the City of Anaheim's IT Contractor, EDS, who installed the hardware, and from D4 Solutions, the outside vendor that installed the fiber connecting the hardware switches in the Central Library.

9. The hardware installation dates erroneously given to the auditors in February 2008 by the Library Automation and Technology staff were obtained from the switches using the 'System Up time' information internally stored on the hardware. I learned from EDS that reliance on this data to identify installation dates was an error, as this date is automatically changed whenever a switch is restarted as a result of maintenance or having made modifications to the switch's configuration.

10. At my request, EDS researched the archived Month End Reports that it produced during the summer of 2007. On the fourth page of its thirteen page report for June 2007, under Network Team Accomplishments, excerpted and attached hereto as Exhibit #6, the installation of the N5 hardware

at the Main library is listed as a team accomplishment. This report's June 2007 creation date is listed on a screen shot of the folder contents for 2007 Month End Reports attached hereto as Exhibit #7.

11. I confirmed that the switches were installed prior to September 30, 2007, through D4 Solutions, the vendor who pulled the fiber used to connect the N5 switches inside the library. They started the fiber installation on 8-21-07(Friday) and completed it on 8-24-07(Monday). D4 Solutions has verified this via email attached hereto as Exhibit #8.

12. It is my belief that the dates that the Library provided to the auditors February 4, 2008 were not the dates that the switches were installed, but rather the dates that the switches were worked on to incorporate additional/upgraded equipment and/or network connections in the library after September 30, 2007 and that no extension was necessary because the hardware was already installed before the September 30, 2007 deadline.

I declare under penalty of perjury of the laws of
California that the foregoing facts are true and correct
and that I could and would testify to those facts in court.

Signed this 3 day of August, 2009 at [Anaheim],
California.

A handwritten signature in cursive script, appearing to read "Karen R. Gerth", is written over a horizontal line.

DECLARANT, Karen R. Gerth, User Support Services Manager

Exhibit 6

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review
Applicant Name/Billed Entity Name: Anaheim Public Library
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Network Monthly Status

The Network Team is responsible for all communication links and network equipment. The Network Team also researches new technologies and supports departments with outside vendors as well as ongoing maintenance.

Accomplishments

- City of Anaheim Wireless:
 - Troubleshoot
 - Network validated and audited
- ACC Camera Project
 - Assisted in the installation and troubleshooting of new cameras
- Stadium Camera Project
 - Coordinated remaining open items to be finished in July
 - Pulling fiber to remaining ticket bunkers
 - Replace damaged cameras
 - Upgrade security room
- Fire 11
 - Connected network equipment to fiber
- Main Library
 - Installed N5

Incidents

- N/A

Plans for Next Month

- Dad Miller Golf Course
 - Connect new network equipment to fiber
- Muzeo network equipment install
- UPS inventory
- Core redundancy
- Wireless Enhancements
 - CTG plant install
- ACC Camera Project
 - Identify scope of work and assist in completing implementation to meet UASI extended deadline of 5/31/07
- Stadium Camera Project-Finish remaining open action items
 - Security room upgrade
 - Ticket bunker fiber pulls
 - Replacing damaged cameras

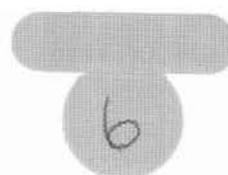


Exhibit 7

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review

Applicant Name/Billed Entity Name: Anaheim Public Library

Billed Entity Number: 143737

FCC Registration Number: 0013407721

FCC Case Number: CIMS00002187036

2007

Network > coaf06 > apps > Month_End_Report > MonthEnd > Month End Reports to be Published > 2007

Search 2007

Organize Open Print Burn New folder

Name	Date modified	Type	Size
April 07.doc	5/14/2007 3:36 PM	Microsoft Office Wo...	355 KB
Aug 07.doc	9/13/2007 8:59 AM	Microsoft Office Wo...	286 KB
AUG 07a.doc	9/13/2007 8:31 AM	Microsoft Office Wo...	461 KB
Feb 07.doc	3/26/2007 5:03 PM	Microsoft Office Wo...	271 KB
January_07.doc	3/1/2007 8:46 AM	Microsoft Office Wo...	382 KB
July 07.doc	8/21/2007 6:21 PM	Microsoft Office Wo...	427 KB
June 07.doc	7/17/2007 3:03 PM	Microsoft Office Wo...	422 KB
March 07.doc	4/17/2007 4:49 PM	Microsoft Office Wo...	241 KB
May 07.doc	6/20/2007 9:21 AM	Microsoft Office Wo...	394 KB
Oct 07.doc	11/13/2007 2:07 PM	Microsoft Office Wo...	320 KB
Sep 07.doc	10/9/2007 2:17 PM	Microsoft Office Wo...	308 KB

June 07.doc
 Microsoft Office Word 97 - 2003 Document
 Date modified: 7/17/2007 3:03 PM
 Authors: Add an author
 Tags: Add a tag
 Title: Add a title
 Size: 421 KB

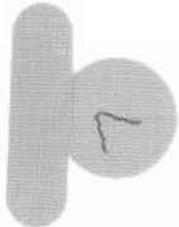


Exhibit 8

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review

Applicant Name/Billed Entity Name: Anaheim Public Library

Billed Entity Number: 143737

FCC Registration Number: 0013407721

FCC Case Number: CIMS00002187036

Karen Gerth

From: Daniel Villalobos [dvillalobos@d4sg.com]
Sent: Thursday, July 23, 2009 3:39 PM
To: Thomas Edelblute
Cc: Karen Gerth
Subject: RE: Fiber pull history

Thomas-

I find the information quicker than I thought! D4 started the installation on 8-21-07(Friday) and completed on 8-24-07(Monday).

Daniel Villalobos
D4 Solutions

"Changing the way you think about cabling!"
714-881-1390 Office
714-881-1399 Fax
310-863-2779 Cell

From: Thomas Edelblute [mailto:TEdelblute@anaheim.net]
Sent: Thursday, July 23, 2009 3:28 PM
To: dvillalobos@D4SG.com
Cc: Karen Gerth
Subject: Fiber pull history

The library is trying to reconstruct the history of the Central Library Renovation project that took place in 2007. Do you have records of when the fiber pull was done at the Central Library between the basement and the second floor? What we are looking for are dates that you started and completed that project.

Thomas Edelblute
Public Access Systems Coordinator
Anaheim Public Library

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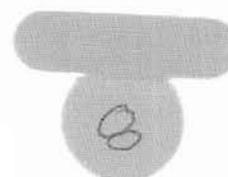


Exhibit 9

Subject: Amendment to the May 20, 2009 Letter of Appeal/Request for Review

Applicant Name/Billed Entity Name: Anaheim Public Library

Billed Entity Number: 143737

FCC Registration Number: 0013407721

FCC Case Number: CIMS00002187036

May 20, 2009

FCC, Office of the Secretary
445 12th Street SW
Washington DC 20554

Subject: Letter of Appeal

Applicant Name/Billed Entity Name: Anaheim Public Library

Billed Entity Number: 143737

FCC Registration Number: 0013407721

471 Application Number: 520930

Funding Request Number: 1434000

CC Docket No: 02-6

Notification of Commitment Adjustment Letter: February 11, 2009

This letter is an Appeal to the Decision for Recovery of Funds for \$169,582.85 and \$8,850.60 as described in the reports for the entity and its application listed above. For questions regarding this appeal, please contact:

Thomas Edelblute, Public Access Systems Coordinator

Anaheim Public Library

500 West Broadway

Anaheim CA 92805

Phone: 714-765-1759, Facsimile: 714-765-1730

e-mail: tedelblute@anaheim.net

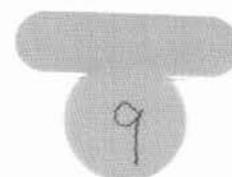
Introduction

The Anaheim Public Library has applied for and has been the beneficiary of e-rate funds for telecommunication discounts and internal connections hardware since 2002.

In 2005, the Anaheim Central Library applied for funds for major renovation of the building, which included the replacement of outdated and non-serviceable network switching/routing hardware. To help offset the cost of the hardware, the library sought and was allocated e-rate funds for reimbursement of its costs. This hardware was purchased during the funding year 2006-2007, installed by the City of Anaheim and successfully delivered to the Anaheim Library Community.

In February 4-7, 2008 the Anaheim Library was audited concerning its use of the e-rate funds for this network hardware and the auditors noted several compliance deficiencies in the Anaheim Library's application process. In 2009 the USAC ordered the Anaheim Public Library to return \$169,582.85 and \$8,850.60 totaling \$178,433.45 based on these deficiencies.

Since 2002, the Anaheim Public Library has benefited from E-rate funds and provided the residents and community of Anaheim access to essential information via the Internet. This funding continues to be a critical resource for providing high-speed telecommunication lines for



Internet access in low income areas of the City where children and their families do not have computer resources in their homes and find that the library is their lifeline for Internet service. Public computer access has also become increasingly critical to growing numbers of adults daily searching for jobs and public assistance via this free resource. The network equipment purchased with these funds supported 257,089 free public Internet sessions to 40,000 individuals in FY06/07. One third of all library users and more than 10% of the total population of Anaheim rely on the public library for their Internet access.

E-rate funds have recently been used to replace outdated hardware and equipment in low income areas of the City, to improve the quality and quantity of Internet access at library sites. The Anaheim Central Library specifically utilized the \$178,433.45 of e-rate funds during a building renovation to replace outdated and non-serviceable network hardware, enabling it to provide Anaheim's residents more than double the number of computer stations as it did in 2003.

The Anaheim Public Library has conscientiously and carefully applied for e-rate funding that would enable it to meet the Information needs of residents over the last six years. All of these federal funds allocated to the Anaheim Library have been consistently and exclusively used for the very specific and specialized technologies indicated in its e-rate applications.

In summary, the Library has not committed any waste, fraud or abuse in the deficiencies cited in the USAC Notification and supporting reports and has proceeded in good faith and due diligence to correct the cited errors and deficiencies. The Library serves an expanding population and growing need for public services accorded by the e-rate funding program. The public interest in delivering the much needed advanced telecommunications services to this growing population is better served by the recommended corrections to the deficiencies rather than the imposition of the monetary penalties that would only harm these Library programs.

Appeal of Notification Re: Funds Sought to be Recovered: \$169,582.85

I. Funding Disbursement Report – Disbursed Funds Recovery Explanation:

After a thorough investigation, it has been determined that funds were improperly disbursed on this funding request. During the course of an audit it was determined that the technology plan for this entity was not approved at the time of submission of the Form 486. Program rules require applicants to obtain approval of technology plans by parties qualified to approve technology plans, prior to submitting the Form 486, for services other than basic telecommunications service. Since this is not a request for basic telecommunications service, the technology plan needed to be approved prior to submitting the Form 486 or the start of services, whichever was earlier. Also during the course of an audit it was determined that funding was disbursed for Priority 2 non-recurring services installed outside of the relevant funding year. FCC rules require applicants to use recurring services within the relevant funding year, and to implement non-recurring services by the applicable deadline established by the Commission. In this instance, the applicant made the certifications on the BEAR Form listed below indicating that the services had been provided within the funding year's applicable deadlines. On the BEAR Form at column 13 and Block 3 Item A, the authorized person represents to USAC that the products and services were delivered to the applicant within the applicable deadline for the relevant funding year. Since these requirements were not met USAC will seek recovery of any improperly disbursed funds from the applicant in the amount of \$169,582.85.

Auditors Finding SL2007BE082_F01:

"[T]he technology plan for this entity was not approved at the time of submission of the Form 486."

Library's Response to finding

In August of 2005 the Library submitted its three-year Technology plan to the California State Library. However, the auditors correctly state that the Library did not receive formal notice that the plan had been approved. The Library held a good faith belief, however, that it did have the state's approval. This belief was premised upon the fact that the Library had not received formal acknowledgement of its 3-year Technology plan sent in September of 2002 either. Apparently, the state had issued a written approval of the 2002 plan which Anaheim Library did not have in its official records.

When the auditors uncovered this discrepancy, another copy of the Technology Plan was immediately e-mailed to the State Library. An email correspondence between Rushton Brandis at the State Library and Anaheim Public library staff on February 7, 2008 confirmed that the Library's 2005 Technology Plan met all the requirements for State approval and, had it been received by the State in 2005, it would have been certified/approved. This correspondence is enclosed/attached for your review as Attachment "A".

Auditor's Recommendation:

The auditor recommended that:

1. Anaheim Library ensure *a technology plan approval letter* is obtained for each year in which Schools and Library funds are requested and
2. USAC seeks recovery of \$169,582.85 of the funds disbursed under 1434000 to the Anaheim Library according to FCC Rules and Orders.

Library's appeal of this recommendation and USAC decision:

The Anaheim Library submits to the first part of the recommendation and will implement administrative safeguards which ensure that all future requests include *a technology plan approval letter*. The library will accomplish this by creating a staff position which has grants and funding oversight as one of its responsibilities. This individual will monitor and oversee the application for, and implementation, disbursement, and tracking of all grants and outside funding. This will ensure that application requirements are met, that each step of the process is systematically reviewed, and that communication between the library and all funding and/or oversight agencies is maintained.

The Anaheim Library appeals the ruling and monetary penalty recommendation that USAC recover \$169,582.85 in disbursed funds based on the following:

The Anaheim Library did not engage in waste, fraud or abuse of the program. In fact, it appears that the City's errors/omissions upon which the USAC has premised its recommendation of are essentially procedural flaws, given the State's indication that the plan submitted by Anaheim would have been approved.

Anaheim Library's records demonstrate a pattern and practice over the years of compliance with all applicable rules at all times, including a good faith attempt to comply in all respects in their submission for the year in question. In prior years, the Library submitted its technology plan by mail to the state and obtained approval and funding without incident. Consistent with Anaheim's established practices, a technology plan was developed over a period of months and mailed to the state for its approval in 2005. The Anaheim Library did not have a record of receipt of written approval from the state of its previous (2002) technology plan and thus did not anticipate receipt of a written approval from the state when submitting its form 486. The Library had thus submitted its technology plan to the state in 2005 and proceeded in the good faith belief it had an approved technology plan when it applied for the funds and submitted its form 486. Significantly, the state has graciously indicated its de facto approval of the Anaheim Library 2005 technology plan. The Anaheim Library respectfully requests that the USAC and/or FCC recognize the state's de facto approval of the technology plan. The USAC's recovery of these funds would not advance the stated goals of the program of ensuring that schools and libraries have access to advanced telecommunications services. In fact, the recovery of these funds could severely adversely affect and/or hinder Anaheim Library's ability to provide access to such services in the future. The Library respectfully requests that it be permitted to retain these funds.

Auditors Finding SL2007BE082_F03:

"The Library installed equipment purchased under the Schools and Libraries program after the cut-off date for Priority 2 services". The applicant did not timely file for a service delivery extension.

Library's Response to finding

The Library holds a good faith belief that the non-recurring goods and services were delivered and paid within the relevant funding year deadline established by the Commission (September 30, 2007). It is important to clarify that the Library did not seek or receive e-rate funds for installation costs. The non-recurring goods and services for which the E-rate funds were requested were paid for and delivered within the relevant funding year (prior to September 30, 2007).

Toward the end of the relevant funding year deadline, the Library was subjected to a two week emergency evacuation when a contractor caused structural damage to the building which compromised the structural integrity of the building. Although this may have caused a slight delay in the installation, the Library did not consider application for an extension since the

installation was performed by internal City staff and E-rate funds had not been sought or used for the costs associated with such installation. All of the non-recurring goods and services for which the E-rate funds were requested had been paid for and delivered well within the relevant funding year deadline.

The auditors have cited to FCC rule 54.505, which does not appear to include an extension filing procedure or refer to such extensions. However, the SLD web site provides guidelines in its web pages for filing extensions which state the following reasons considered for extensions:

1. A Funding Commitment Decision Letter (FCDL) is issued by USAC on or after March 1 of the funding year for which support is authorized.
2. Service provider change authorizations or service substitution authorizations are approved by USAC on or after March 1 of the funding year for which support is authorized.
3. The applicant requested an extension because the service provider was unable to complete delivery and installation for reasons beyond the service provider's control.
4. The applicant requested an extension because the service provider has been unwilling to complete delivery and installation after USAC withheld payment for those services on a properly-submitted invoice for more than 60 days after submission of the invoice.

The service provider was contracted for delivery of goods and not for the installation. Therefore, the service provider's responsibilities ended with the delivery of the network hardware to the City of Anaheim within the mandatory deadline. Evidence of invoicing and payment to this effect is enclosed/attached for review as Attachment "B". If installation is required to be completed even when not applied or paid for with E-rate funds, clarification of this definition and a CFR citation or guideline is respectfully requested for future reference and familiarization.

Auditor's Recommendation:

The auditor recommended *that the Library ensure that an extension is requested and received from the Universal Service Administrative Company if the internal connections installation can not be completed by the cut-off date of September 30.*

Library's appeal of this recommendation and USAC decision

The Library submits to this recommendation and will further familiarize itself with all applicable rules and regulations, including attendance by appropriate personnel to E-rate training sessions offered by the state and telecommunications companies. To this end, several staff members, including the staff member who has the responsibility of grants and funding oversight, will attend E-rate training.

The auditor's recommendation further referenced the recovery of \$113,055, noting it was already included in the \$178,434.00 discussed in Finding SL2007BE082_F01. The Library respectfully submits that the Library's mistaken belief that no extension was needed as described above, was a harmless error and can be readily cured by the clarifications and more thorough review of applicable rules and regulations and education of its personnel proposed above. The Library further respectfully suggests that the proposed monetary penalty for failure to file for an extension under these circumstances would be inconsistent with the general public interest and contrary to the advancement of the stated goals of the program of ensuring that schools and libraries have access to advanced telecommunications services.

In summary, the Library has not committed any waste, fraud or abuse in the deficiencies cited in the USAC Notification and supporting reports and has proceeded in good faith and due diligence to correct the errors and deficiencies. The Library serves an expanding population and growing need for public services accorded by the E-rate funding program. The public interest in delivering the much needed advanced telecommunications services to this growing population is better served by the recommended corrections to the deficiencies rather than the imposition of the monetary penalties that would only harm these Library programs.

Appeal of Notification Re: Funds Sought to be Recovered: \$8,850.60

II. Funding Disbursement Report – Disbursed Funds Recovery Explanation:

After a thorough review, it was determined that the funding commitment for this funding request must be reduced by \$8,850.60. During the course of an audit it was determined that your Form 470 did not include the service for which you sought funding in your Form 471 application, which is a violation of the FCC's competitive bidding rules. On your Form 471 application part of the request was for maintenance of internal connections. However your Form 470 #37288000544522 did not post for this category of service. FCC rules require that except under limited circumstances, all eligible schools and libraries shall seek competitive bids for all services eligible for support. Since the services for which you sought funding were not properly posted to the website for competitive bidding, the commitment has been reduced by \$8,850.60 and USAC will seek recovery of \$8,850.60 from the applicant.

Auditors Finding SL2007BE082_F02:

"The Library misinterpreted the rules" and did not include a separate request for maintenance of internal connections on its Form 470.

Library's Response to finding

The Library committed a clerical error in omitting to check the column concerning "basic maintenance" for internal connections. One RFP was issued for the purchase and prepayment of a maintenance plan. Thus, a separate RFP for maintenance was not issued. However, the actual

cost of the maintenance services were included in the bid solicitation, were covered in the vendor's bid and were paid for with the funds disbursed.

Auditor's Recommendation:

The Auditor has recommended that "the Library ensure that future reimbursement is requested only for eligible goods and services that were requested on the FCC Form 470" and a penalty/reduction in the amount of \$8,850.60. USAC has further noted that the funding commitment reduction of \$8,850.60 for these services is already included in the original award amount of \$178,433.45.

Library's appeal of this recommendation and USAC decision:

The Library submits that it committed a clerical error in its omission to check a portion of the form that would have segregated the cost of maintenance from the overall cost of the internal connection. This was a harmless procedural error and there was no abuse, fraud or waste. This problem can be readily cured by the Library's improved diligence in preparing its FCC Form 470 to carefully detail the goods and services it applies for in the future. New, additional safeguards will be implemented and several people, including a staff member specifically assigned for grants and funding oversight, will review all applications prior to submission. The Library respectfully requests that it be permitted to retain these funds with the understanding that these improved practices will be immediately implemented.

The Library has thoroughly reviewed and implemented the auditors' recommendations to cure the weaknesses noted in the Schedule of Findings. In accordance with these recommendations, the library's staff position created for grants and funding oversight, will monitor and oversee the application for, and implementation, disbursement, and tracking of all grants and outside funding. This will ensure that application requirements are met, that each step of the process is systematically reviewed, and that communication between the library and all funding and/or oversight agencies is maintained.

The Anaheim Public Library has not committed any waste, fraud or abuse in the course of any of the noted deficiencies. The City recognizes the importance of adhering to procedures however, in the instant case, there has been no detriment to the public and the enforcement of the USAC's recommendations will result in a tremendous public detriment. All of the disbursed funds have been properly allocated to provide the services identified in the grant applications and the Technology Plan that meets the state's approval standards.

The Library submits this appeal and respectfully requests that the Library be permitted to

retain the funds to ensure that the public interest in the delivery of advanced telecommunications services to its expanding population may continue to be served.

Carol Stone

A handwritten signature in cursive script that reads "Carol Stone".

City Librarian, City of Anaheim

Attachment A

Subject: Letter of Appeal
Billed Entity Name: Anaheim Public Library
Billed Entity Number: 143737
FCC Registration Number: 0013407721
471 Application Number: 520930
Funding Request Number: 1434000
CC Docket No: 02-6

Thomas Edelblute

From: Brandis, Rushton [rbrandis@library.ca.gov]
Sent: Thursday, February 07, 2008 11:15 AM
To: Thomas Edelblute
Subject: RE: Question re: tech plan you never received

Yes. The certification lists the five points required of a tech plan. In the template on our Web site, those core elements are listed on page 2 of the instructions. See

<http://www.library.ca.gov/services/docs/TechPlan.doc>

Page 2 listing the five criteria for a technology plan are included in the attached pdf file and are taken from

<http://www.universalservice.org/sl/applicants/step02/technology-planning/>

Rush

Mr. Rushton Brandis, Technology Consultant
Library Development Services Bureau
California State Library
P.O. Box 942837
Sacramento, CA 94237-0001
(916) 653-5471 (voice)
(916) 653-8443 (fax)
rbrandis at library dot ca dot gov

From: Thomas Edelblute [mailto:TEdelblute@anaheim.net]
Sent: Thursday, February 07, 2008 10:51 AM
To: Brandis, Rushton
Subject: Question re: tech plan you never received

Here is a question I have for you, and the response might be helpful to our auditors. If you had this tech plan on file, does it look like something you would have issued a certification for.

Thomas Edelblute
Public Access Systems Coordinator
Anaheim Public Library

2/7/2008

Subject: Letter of Appeal
 Billed Entity Name: Anaheim Public Library
 Billed Entity Number: 143737

FCC Registration Number: 0013407721 (208) 664-0969
 471 Application Number: 520930
 Funding Request Number: 1434000
 CC Docket No: 02-6



Coeur d'com
 1703 N. 3rd Street
 PO Box 3196
 Coeur d'Alene, ID 83816-2523
 (208) 667-2031

Invoice

Number: 1821
 Date: January 11, 2007

SHIPPED

Bill To:

Thomas Edelblute
 Anaheim Public Library
 500 West Broadway
 Anaheim, CA 92805

Ship To:

City of Anaheim
 Information Services
 201 S. Anaheim Blvd 4th Floor
 Anaheim, CA 92805

PO Number	Terms	Sales Rep
Contract #3944	Net 30	Jeff Adams

Product ID	Description	Quantity	Price	Tax	Amount
N5-SYSTEM-R	N5 Bundle with 2 power supplies	3.00	7,471.75	✓	22,415.25
N-POE-1200W	Matrix POE 1200 Watt Power Supply	6.00	780.00	✓	4,680.00
7H4385-49	DFE w/48 10/100 RJ45 and NEM slot	12.00	9,746.75	✓	116,961.00
7G4202-60	DFE w/60 10/100/1000 RJ45 ports	1.00	13,646.75	✓	13,646.75
7G-6MGBIC-A	NEM w/6 1000Base-X ports	3.00	2,271.75	✓	6,815.25
MGBIC-08	1000Base-LX/LH Mini GBIC SMF	2.00	3,246.75	✓	6,493.50
MGBIC-LC01	Mini GBIC 1000Base-SX MM Port	12.00	321.75	✓	3,861.00
ES-SN-S13	Three years Enterasys SupportNet	3.00	9,834.00		29,502.00

apply all to FRU

apply first gear to FRU

*101-213-4262-9720
 pay on contract #3944
 for questions call
 Thomas Edelblute x1759*

*installed 5/07
 Enterasys N5 network switch*

The price for the Goods is stated in the invoice and, unless otherwise specified by Seller, is payable within 30 days. If Buyer does not make payment when due, Buyer shall pay a fee on past due amounts of 1.5% per month or the maximum rate allowed by law, whichever is less.

0 - 30 days	31 - 60 days	61 - 90 days	> 90 days	Total
\$0.00	\$0.00	\$298,067.31	\$0.00	\$299,067.31

CHECK DATE: 04/09/2007

VENDOR: VC0000001511

CITY OF ANAHEIM 00000001497465
NAME: COEUR D'COM COMMUNICATIONS INC

1497465

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	PURCHASE ORDER NO.	AMOUNT
1821	04/11/2007	SUPPORTNET		217,927.39
<p>Attachment B Subject: Letter of Appeal Billed Entity Name: Anaheim Public Library Billed Entity Number: 143737 FCC Registration Number: 0013407721 471 Application Number: 520930 Funding Request Number: 1434000 CC Docket No: 02-6</p>				

Vendor: VC0000001511

Page TOTAL: 217,927.39
217,927.39

DO NOT ACCEPT THIS CHECK, UNLESS THE PINK LOCK & KEY ICONS FADE WHEN WARNED AND YOU CAN SEE A PENTAGON-SHAPED TRUE WATERMARK WHEN HELD TO THE LIGHT.

TO THE TREASURER
CITY OF ANAHEIM
ANAHEIM, CALIFORNIA

ACCOUNTS PAYABLE ACCOUNT
CITY OF ANAHEIM
ANAHEIM, CALIFORNIA

1497465

DATE: 04-09-2007

THE SUM OF

AMOUNT \$217,927.39

Two Hundred Seventeen Thousand Nine Hundred Twenty Seven And 38/100 Dollars

PAY TO THE ORDER OF
COEUR D'COM COMMUNICATIONS INC
PO BOX 3198
COEUR D'ALENE, ID 83816-2523

VOID 180 DAYS
AFTER DATE OF ISSUE

WELLS FARGO BANK, N.A.
116 HOSPITAL DRIVE
VAN WERT, OH 45091

WELLS FARGO BANK

1497465 04120382496000433021

DO NOT ACCEPT THIS CHECK, UNLESS THE PINK LOCK & KEY ICONS FADE WHEN WARNED AND YOU CAN SEE A PENTAGON-SHAPED TRUE WATERMARK WHEN HELD TO THE LIGHT.