



Trillion Partners, Inc.
9208 Waterford Centre Blvd., Suite 150
Austin, Texas 78758

June 22, 2010

Ms. Pina Portanova
USAC Schools and Library Division
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036
pportan@sl.universalservice.org

Delivered via email

Federal Communications Commission
Attention: Gina Spade, Deputy Division Chief
Telecommunications Access Policy Division
445 12th Street SW
Washington, DC 20554

Delivered via Electronic Comments Filing System

RE: Response to USAC and Appeal to FCC: Kings Canyon Unified School District Letter (6/4/10)

Dear Ms. Portanova and Ms. Spade,

On behalf of the Board, investors and management team of Trillion Partners, Inc., please accept this response to the Intent to Deny Letter from USAC to Kings Canyon Unified School District. Additionally, please accept this letter as a simultaneous appeal to the FCC of the Intent to Deny, requesting that all of the applications as referenced in such letter be approved for funding.

Due to the magnitude of the proposed denial and the substantial delay in the issuance of USAC's currently proposed intent to deny, Trillion and all of its affected customers are under a severe hardship and request expedited resolution of this matter.

Trillion Partners is responding to this letter because thousands of students this portion of California will likely be denied crucial educational access. Trillion constructed a facilities based broadband network with its customers relying on the consistent approvals by USAC in years past. The approval of this application is needed in order to continue to support these children who rely every school day on Trillion's embedded investment of this broadband asset.

During a phone conference on June 9, 2010, Mr. Scott Barash indicated that our comments would be accepted and included as part of USAC's review of the application. This must in no way be considered a delay in the FCC's immediate consideration of this urgent appeal.

Background

The Kings Canyon Unified School District covers approximately 600-square miles and serves a student population approaching 10,000. The Kings Canyon Unified School District operates 19 schools including K-5, K-8, Middle School, and High School.

Trillion has provided broadband services to the district since 2005 using a customer specific facilities based wireless WAN.

Response to Questions

Kings Canyon became a customer of Trillion's on February 16, 2006. All of the expenses described below per the letter from USAC occurred after Kings Canyon had become an existing customer. During the construction and ongoing maintenance and operation of the network, there are routine meals and expenses between staff of Trillion and Kings Canyon, all of which are within state and local guidelines.

USAC listed specific expenses:

- February 1, 2006 – Trillion provided dinner for Scott Buller in the amount of \$142.37 (\$47.45/person);
- March 9, 2006 – Trillion provided breakfast, lunch and dinner for Jerry Edmonds with a total cost of all meals at \$91.91 (\$30.63/person);
- May 23, 2006 – Trillion provided lunch for Jerry Edmonds and three other Kings Canyon employees in the amount of \$64.91 (\$12.98/person);
- In July 2006, Jerry Edmonds attended Trillion's VETC conference in Austin, Texas. Documentation from Trillion and Kings Canyon shows that Trillion paid for the following: \$416.97 on Mr. Edmonds' lodging/food/entertainment at the conference. Trillion also reimbursed Mr. Edmonds \$458.20 for air fare from California to Austin, TX.
- As noted above, on September 26, 2006, Kings Canyon posted its Form 470. On September 28, 2006, Gina Espinoza (Trillion) paid for lunch for Jerry Edmonds in the amount of \$67.48 (\$33.74/person);
- On October 31, 2006, Trillion hosted a dinner at The Fish Hopper for Trillion customers. The total cost of the event was \$1500.00. Trillion documentation shows that 18 persons attended, including Jerry Edmonds. The cost per person was \$83.33. (This amount not only exceeds the federal gift standards, but also exceeds the limits set by California procurement laws that require any employee of a school district to report any single item that exceeds \$50.);
- On December 8, 2006, Trillion provided lunch for Jerry Edmonds and Matt Cunningham with a total cost of \$99.15 (\$16.52/person);
- On January 30, 2007, Trillion provided dinner for Jerry Edmonds at a cost of \$57.50 (\$19.16/person).

All of these expenses are, in fact, in full compliance with state and local procurement guidelines. It is our understanding that Jerry Edmonds is not a "designated employee" under California statutes.

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Regarding the October 31, 2006 expense, USAC states, “This amount not only exceeds the federal gift standards, but also exceeds the limits set by California procurement laws that require any employee of a school district to report any single item that exceeds \$50.”

Regarding California procurements laws, the expenses related to Mr. Edmonds are fully compliant with California procurement guidelines. Specifically, the \$50 reporting requirement is not applicable to the expenses for Mr. Edmonds in October, 2006 because he was a speaker at the California Education Technology Professionals Association (CETPA) conference (See attached CETPA agenda). The expense occurred at this conference. California statute, CA GOV CODE § 89506, states that expenses for “transportation and related lodging and subsistence” are not limited by the \$50 reporting requirement if the expense relates to a speech given on a governmental purpose:

§ 89506. Travel payments, advances and reimbursements

(a) Payments, advances, or reimbursements, for travel, including actual transportation and related lodging and subsistence that is reasonably related to a legislative or governmental purpose, or to an issue of state, national, or international public policy, are not prohibited or limited by this chapter if either of the following apply:

(1) The travel is in connection with a speech given by the elected state officer, local elected officeholder, candidate for elected state office or local elected office, an individual specified in [Section 87200](#), member of a state board or commission, or designated employee of a state or local government agency, the lodging and subsistence expenses are limited to the day immediately preceding, the day of, and the day immediately following the speech, and the travel is within the United States.

(2) The travel is provided by a government, a governmental agency, a foreign government, a governmental authority, a bona fide public or private educational institution, as defined in [Section 203 of the Revenue and Taxation Code](#), a nonprofit organization that is exempt from taxation under [Section 501\(c\)\(3\) of the Internal Revenue Code](#), or by a person domiciled outside the United States which substantially satisfies the requirements for tax-exempt status under [Section 501\(c\)\(3\) of the Internal Revenue Code](#).

The facts provided in the letter from USAC list events that, in each instance, are in full compliance with state and local procurement laws and regulations. As has been provided in a letter to Scott Barash of USAC dated June 8, 2010, Trillion has already described how the FCC guidelines regarding meals, gifts and gratuities are based on state and local procurement rules, not a separate federal standard. Also as we previously outlined, Trillion is aware of the Notice of Proposed Rulemaking dated May 20, 2010, soliciting public comment on a potential rule which would extend current rules for Executive Branch employees to employees of governmental entities that participate in the E-Rate program. As of this writing, not only has this new proposed rule not yet been approved, it is definitely not being proposed to apply retroactively. This means that this proposed rule did not and will not apply to the facts you describe to form the basis for the proposed denial. Furthermore, Trillion currently operates under a strict Code of Conduct which would fully comply with the FCC’s proposed guideline. In all instances, the facts you describe regarding Trillion did not affect the competitive bidding process and were in full compliance with all applicable competitive bidding and procurement requirements.

Regarding Visionaries in Technology Education Counsel (“VTEC”), as provided in the letter to Mel Blackwell dated June 8, 2009, VTEC was an educational conference for existing Trillion customers after they were under contract with Trillion. This was a participant-driven conference focused on education-oriented best practices in which Mr. Edmonds spoke (for a governmental purpose pursuant to CA GOV CODE § 89506). The main goal was improving education and the application of

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technologies to achieve this goal. Guest speakers included nationally renowned speakers including a University professor and an learning technology expert, neither of whom were associated with Trillion. Each participant shared their thoughts in an open discussion forum on what they generally thought would shape education in the years to come.

Expenses associated with the VTEC conference in no way affected any competitive bidding process and only applied to existing customers who wished to discuss education issues with their peers. This conference was in full compliance with all applicable state and local procurement guidelines.

The amounts spent on meals or other routine business expenses were trivial and could not have possibly influenced a decision that would ultimately be made by the governing board. Furthermore, no member of the governing board received any such expense. The fact is, Trillion invested \$728,677 in capital to construct a network providing critical services with a total contract value of \$2,313,866, while the amount of the routine business meals and expenses only amounted to \$1,441 across several low level employees over a four year period and never went to any individual with decision making authority.

In summary, Trillion's actions were in full compliance with state and local procurement guidelines in effect at the time. The currently proposed FCC rule on gifts and gratuities has not been approved and is not proposed to apply retroactively to the time period in question. The amounts of the routine business meals and expenses were trivial and were never given to decision makers. Therefore, this customer's actions did not, in any way whatsoever, improperly affect the competitive bidding process.

Trillion respectfully requests that this application not be denied based on this issue.

- You have indicated in your response, that Jerry Edmonds had accepted two trips from Trillion. The first trip was to Houston on January 5-6, 2005 to attend a "Trillion Open House" event. The cost of this trip included lodging, air fare, and meals. Documentation provided shows the air fare alone cost \$418.40. However, you posted your Form 470 on January 3, 2005 and awarded the contract to Trillion on February 16, 2005. Please explain how the acceptance and attendance at this Trillion sponsored event during the 28-day competitive bidding period did not violate program rules. (See December 29, 2004 email from Gina Espinoza (Trillion) to Jerry Edmonds (Kings Canyon).)

Kings Canyon's RFP with a due date of February 1, 2005 specified that the second highest criteria be "*prior experience*" weighted at 25%. As of January 2005 Trillion had limited customer installations in the western part of the United States in which Kings Canyon could evaluate this important criteria. In order to ensure a fair and open bidding process, in which all competitors small and large were able to compete equally, and weight properly the smaller competitors' actual experience, a site due diligence visit was necessary.

The event referred to above as the "Trillion Open House" was in fact a site due diligence visit, in which Kings Canyon was the only attendee to an existing Trillion installation in Texas.

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- Based upon review of your response and the received documentation, it appears that your consultant, Emerson Tripoli, introduced you to Trillion at a lunch he

hosted on December 16, 2004 at the Olive Garden. In an email dated December 16, 2004, Mr. Tripoli sent an email to Gina Espinoza (Trillion) enclosing a copy of Kings Canyon's Form 470 from the previous year. The email also noted that Ms. Espinoza had set up a following meeting with Scott Buller (Kings Canyon) and Mr. Tripoli to meet the next day at 8 am. On December 17, 2004, Trillion provided Kings Canyon with a sample Statement of Work dated 12/17/2004. On December 22, 2004, Emerson Tripoli prepared the Form 470 for Kings Canyon and noted that he "relaxed the scope of work a little." Based upon the timing of the documentation, it appears that Trillion forwarded a draft Statement of Work so that Kings Canyon's Form 470 would match Trillion's own scope of work. Please explain how this conduct between Trillion, Emerson Tripoli and Kings Canyon does not violate program rules. Please provide any further information you have regarding Emerson Tripoli's relationship with Trillion. (See attached emails regarding the preparation of the Form 470.)

Regarding the Form 470, it referred to a separately published RFP, both of which are attached. Also attached is the Trillion blank statement of work form that is referred to. The statement of work does not contain any specifications. It is simply an example of how a project is managed during construction and how communications are done related to the project. It could in no way have influenced the competitive bidding process that the school district conducted. Upon review of the RFP/ 470 it is clear that there was no correlation whatsoever between the contents of the RFP/ 470 and the blank Trillion statement of work document. The RFP/ 470 contained no specificity that could give Trillion a competitive advantage.

Regarding Mr. Tripoli, it is not against USAC guidelines for an E-Rate consultant to provide publicly available information, as in the case of him providing the prior year's Form 470. This document is readily available on USAC's website. Trillion has no relationship whatsoever with Mr. Tripoli and it is clear after comparing Trillion's sample statement of work to Kings Canyon's RFP, that the sample statement of work had absolutely no influence over the development of the RFP.

Sincerely,

Trillion Partners, Inc.

Attachments:

- Trillion Account Summary and Review June 8, 2009 – Kings Canyon Unified School District
- Copy of Letter from USAC to Kings Canyon dated June 4, 2010
- Letter to Mr. Scott Barash dated June 8, 2010
- Letter to Mr. Scott Barash dated June 17, 2010
- Trillion Sample Statement of Work 2004/2005
- CETPA 11/1/06 Conference Agenda
- Form 470
- Kings Canyon's Request for Proposal

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Trillion Account Summary and Review

Customer Information

Name KINGS CANYON UNIF SCHOOL DIST
Address 675 W. Manning Avenue, Reedley, CA, 93654
Billed Entity # (BEN) 144054
Lead Sales Representative Gina Espinoza
Customer of:
(Direct Sales Communications) Gary Gaessler No Roger Clague Yes Steve Davis No
Trillion/E-Rate Consultant Communication None
Customer Status Active customer

Contract Information

ContractNumber	Award Date	End Date	470 Number	470 Date	FRN Number	471 Number
A10-CA-KINGSCYN-010405-W-SA	02/16/05	06/30/10	570490000528924	01/03/05	1335796	482378
A10-CA-KINGSCYN-010405 W-SA	02/16/05	06/30/10	570490000528924	01/03/05	1486420	537076

Extensions/Renewals/Upgrades

ContractNumber	Award Date	End Date	470 Number	470 Date	FRN Number	471 Number
NA	02/07/07	06/30/12	792580000587057	09/26/06	1626423	586166
NA	02/07/07	06/30/12	792580000587057	09/26/06	1661563	602928
N/A	02/07/07	06/30/12	792580000587057	09/26/06	1706205	602928
NA	02/07/07	06/30/12	792580000587057	09/26/06	1834943	672183
NA	02/07/07	06/30/12	792580000587057	09/26/06	1834939	672183

Expense Summary

Governing State California
Business Meals In compliance with state guidelines
Gifts & Entertainment In compliance with state guidelines

Customer Communications

Communications Provided **Begin Date** 7/25/2005 **End Date** 4/5/2006
Customer Communications Summary Typical customer communications. (Nine e-mails)

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**Schools and Libraries Division**

Date: June 4, 2010

Ron Hudson
Deputy Superintendent
Kings Canyon Unified School District
(559) 305-7044

Fred Brakeman, President
Infinity Communications & Consulting
(661) 716-1840

Application Number(s): 602928, 672183, 715729

Response Due Date: June 21, 2010

Dear Mr. Hudson:

We are in the process of reviewing Funding Years 2008, 2009 and 2010 Form(s) 471 to ensure that they are in compliance with the rules of the Universal Service program. Funding Year 2008 Application 602928, FRNs 1661563, 1706205, Funding Year 2009 Application 672183, FRNs 1834943, 1834939 and Funding Year 2010 Application 715729, FRN 1948020 will be denied for the following reasons:

Based on the documentation that has been provided to USAC, the entire Funding Request Numbers (FRNs) 1661563, 1706205, 1834943, 1834939, and 1948020 will be denied because Kings Canyon Unified School District (Kings Canyon) did not conduct a fair and open competitive bidding process. The Form 470 (No. 79580000587057) associated with these FRNs was posted on September 26, 2006 and the Contract Award Date was February 7, 2007.

The documentation provided indicates that Jerry Edmonds, Scott Buller and other Kings Canyon employees accepted meals, as well as a trip to Austin, Texas, from Trillion prior to and during the process Kings Canyon conducted to select a service provider to provide the goods and services that were included in the September 26, 2006 Form 470. Specifically, USAC has received documentation for the following meals and a trip that was accepted and attended by Jerry Edmonds, Scott Buller and other Kings Canyon employees:

- February 1, 2006 – Trillion provided dinner for Scott Buller in the amount of \$142.37 (\$47.45/person);
- March 9, 2006 – Trillion provided breakfast, lunch and dinner for Jerry Edmonds with a total cost of all meals at \$91.91 (\$30.63/person);
- May 23, 2006 – Trillion provided lunch for Jerry Edmonds and three other Kings Canyon employees in the amount of \$64.91 (\$12.98/person);
- In July 2006, Jerry Edmonds attended Trillion's VETC conference in Austin, Texas. Documentation from Trillion and Kings Canyon shows that Trillion paid for the following: \$416.97 on Mr. Edmonds' lodging/food/entertainment at the conference. Trillion also reimbursed Mr. Edmonds \$458.20 for air fare from California to Austin, TX.

- As noted above, on September 26, 2006, Kings Canyon posted its Form 470. On September 28, 2006, Gina Espinoza (Trillion) paid for lunch for Jerry Edmonds in the amount of \$67.48 (\$33.74/person);
- On October 31, 2006, Trillion hosted a dinner at The Fish Hopper for Trillion customers. The total cost of the event was \$1500.00. Trillion documentation shows that 18 persons attended, including Jerry Edmonds. The cost per person was \$83.33. (This amount not only exceeds the federal gift standards, but also exceeds the limits set by California procurement laws that require any employee of a school district to report any single item that exceeds \$50.);
- On December 8, 2006, Trillion provided lunch for Jerry Edmonds and Matt Cunningham with a total cost of \$99.15 (\$16.52/person);
- On January 30, 2007, Trillion provided dinner for Jerry Edmonds at a cost of \$57.50 (\$19.16/person).

Mr. Edmonds' costs to attend Trillion's annual VETC conference in Austin, Texas in July 2006, as well as the value of meals accepted by Kings Canyon employees exceed the federal gifts standards of \$20/person/occasion not to exceed \$50/person/per calendar year. By accepting the free trip to Austin, Texas and the numerous meals offered by Trillion, it does not appear that the competitive bidding process was not fair and open. This non-competitive conduct is further supported by the documentation that shows a number of the above referenced meals occurred during the time period between the posting of Kings Canyon's Form 470 on September 26, 2006 and the awarding of the contract to Trillion on February 7, 2007. Since you the gifts were received during the competitive bidding process, the entire contract is deemed tainted and funding for all FRNs associated with that Form 470 are denied. Based on this information, it appears that you did not conduct a fair and open competitive process, free from outside influence. For additional guidance regarding the competitive bidding process, please refer to the USAC website at: <http://www.usac.org/si/applicants/step03/run-open-fair-competition.aspx>. (A copy of documentation for the above-cited meals and trip is attached and is titled Kings Canyon.Meals.Trips documents.)

Additionally, please answer the following questions so that we may complete our review.

- You have indicated in your response, that Jerry Edmonds had accepted two trips from Trillion. The first trip was to Houston on January 5-6, 2005 to attend a "Trillion Open House" event. The cost of this trip included lodging, air fare, and meals. Documentation provided shows the air fare alone cost \$418.40. However, you posted your Form 470 on January 3, 2005 and awarded the contract to Trillion on February 16, 2005. Please explain how the acceptance and attendance at this Trillion sponsored event during the 28-day competitive bidding period did not violate program rules. (See December 29, 2004 email from Gina Espinoza (Trillion) to Jerry Edmonds (Kings Canyon).)
- In your response, you did not indicate that you accepted any meals from Trillion. Based upon the documentation provided with this letter, please explain the discrepancy in your response with the Trillion provided documentation for these meals. (See attached June 23, 2009 email from Jerry Edmonds (Kings Canyon) to Michelle Hickerson (Infinity).
- Based upon review of your response and the received documentation, it appears that your consultant, Emerson Tripoli, introduced you to Trillion at a lunch he

hosted on December 16, 2004 at the Olive Garden. In an email dated December 16, 2004, Mr. Tripoli sent an email to Gina Espinoza (Trillion) enclosing a copy of Kings Canyon's Form 470 from the previous year. The email also noted that Ms. Espinoza had set up a following meeting with Scott Buller (Kings Canyon) and Mr. Tripoli to meet the next day at 8 am. On December 17, 2004, Trillion provided Kings Canyon with a sample Statement of Work dated 12/17/2004. On December 22, 2004, Emerson Tripoli prepared the Form 470 for Kings Canyon and noted that he "relaxed the scope of work a little." Based upon the timing of the documentation, it appears that Trillion forwarded a draft Statement of Work so that Kings Canyon's Form 470 would match Trillion's own scope of work. Please explain how this conduct between Trillion, Emerson Tripoli and Kings Canyon does not violate program rules. Please provide any further information you have regarding Emerson Tripoli's relationship with Trillion. (See attached emails regarding the preparation of the Form 470.)

You have 15 days to respond to this request. Your response is due by the close of business June 21, 2010. Please reply via e-mail or fax. Please provide complete responses and documentation to the questions listed above. It is important that you provide complete responses to ensure the timely review of your applications. If you do not respond, or provide incomplete responses, your funding request(s) (FRNs) may be reduced or denied, or in the case of committed FRNs subjected to commitment adjustment and we will perform the denials described at the beginning of this letter.

If the applicant's authorized representative completed the information in this document, please attach a copy of the letter of agency or consulting agreement between the applicant and the consultant authorizing them to act on the school or library's behalf. If you receive assistance outside of your organization in responding to this request, please indicate this in your reply.

Should you wish to cancel your Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s). Include in any cancellation request the Form 471 application number(s) and/or funding request number(s). The cancellation request should be signed and dated and including both the name and title of the authorized representative. Please respond to this letter within fifteen (15) days. If you fail to respond to this letter, we will perform the actions described above and complete our review based upon the documentation and information we have received already.

Thank you for your cooperation and continued support of the Universal Service Program.

Pina Portanova
USAC, Schools and Libraries Division
Phone: 973-581-5016
Fax: 973-599-6552
E-mail: pportan@sl.universalservice.org

June 8th, 2010

Mr. Scott Barash
Chief Executive Officer
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

Dear Scott,

On behalf of the Board, investors and management team of Trillion, I want to send a sincere thanks for applying additional resources to Trillion's applicants. Yet, as communicated via emails and phone calls from Ron Reich of Intel, Trillion Partners has reached a point of insolvency and imminent bankruptcy given an extended lack of funding under the E-Rate program. As referenced in the letters to the E-Rate Executive Director last January, and last month to Chairman Genachowski, Trillion has undergone enormous strain and on-going financial damages due to multi-year delays in processing in excess of \$17M in applications. USAC committed to process a minimum of 50 applications by yesterday, the 7th of June. Trillion is now aware of disposition on some of the 50 promised applications, which in some cases stretch back to 2006.

Trillion is now aware that USAC recently sent letters to at least 13 Trillion customers over the last few days, indicating intention to deny their applications. This letter details the overarching policy context and cites reasons in specific cases as to why applications in this group of 13 have been incorrectly processed after very lengthy delays. This letter is a final appeal to hopefully prevent an avoidable and catastrophic series of service disruptions. We strongly believe that a "fair and open competitive process" was not impaired by a conflict of interest, and that the regulations and rules have been misapplied and the facts misinterpreted in each of these applications. We urge that USAC immediately reconsider these specific applications and approve them for funding. If these actions are not corrected immediately, the company does not expect to have funds on Monday June 14th to make its payroll obligation and to make payment on long overdue obligations to circuit suppliers. We expect the to be forced to close its doors and to discontinue service to over 600,000 students and 22,000 school administrators. The market will be left with one less competent service provider in direct conflict with the FCC's goal of promoting a competitive environment to deliver the best broadband services to schools at the lowest cost.

Trillion has endeavored, based upon years of USAC guidance and training, to make sure that its approach is consistent with state, local and FCC procurement rules. Trillion believes that the data provided by Trillion to USAC supports this. However, it appears that USAC is basing potential denials on rules that have never been formally adopted or interpretations of data that are not consistent with the facts as provided in the documentation by the company. We are alarmed that USAC is applying potential rules retroactively to applications as far back as 2004. The results of these practices are seemingly to single out Trillion in a manner that if applied universally across all service providers would result in denial of the majority of all applications put forth for E-Rate funding to USAC.

Based upon the 13 letters received thus far, the following are policies that have been incorrectly applied.

- Gifts and other expenses that are allowable
- Consortium member approval prior to bid
- 470 related communications by a vendor
- Communications allowable by an incumbent vendor with its customer

Below we provide factual evidence that clears any suspicion of conflicts of interest or other issues that may have prevented a fair and open competitive process on the example application under review. We believe that for each and every of the 13 applications in question, that the facts support the same strict and clear compliance with all rules communicated by USAC. Each of these applications must be swiftly approved so that further misapplication of rules and unjust financial damage to company can stop immediately. For example, Trillion was recently provided a letter from USAC dated June 3, 2010 to a Trillion customer, Houston County Board of Education, that threatens denial of their E-Rate application. In this letter, the applicant, Houston County Board of Education, is told that its application for E-Rate funding will be denied in full due to a \$26 meal provided by the school district's incumbent service provider, Trillion. The letter solely points to this meal as reason for impending denial.

“Based on the documentation that you or Trillion Partners, Inc. have provided, the entire amount of FRNs 1786841, 1786824, and 1809620 will be denied because you did not conduct a fair and open competitive bid process free from conflicts of interest. The documentation you or Trillion provided indicates that you were offered and accepted valuable gifts, in the form of a meal, immediately prior to the process you conducted to select a service to provide these goods and services from the service provider you selected. This gift shows that you engaged in non-competitive bidding practices in violation of program rules. For additional guidance regarding the competitive bidding process, please refer to the USAC website at: <http://www.usac.org/sl/applicants/step03/run-open-fair-competition.aspx>.

The gift was in the form of a meal at Pig Out BBQ 1 on January 6, 2009 in the amount of \$26.34.”

This letter raises many concerns. The reviewer is basing this pending denial on several inaccuracies. As an example, FRN's 1786841 and 1786824 are continuation requests of a contract that was signed in January of 2008, a full twelve months before this meal was provided. The school district has been a customer of Trillion's since 2006, when Trillion acquired the contract from another company. How could a \$26.34 meal to a non-decision maker influence a Superintendent and the Board of Houston County to make a decision to award a contract for \$348,804 over a three year term, when the contract award occurred a full year prior to the meal?

USAC also seems to be ignoring its own guidance regarding its policy on meal expenses. In a letter from USAC to Trillion dated April 8, 2009, where USAC expresses its concern about meals and other gifts, USAC states that the applicant must comply with “all applicable state

and local procurement laws". We have done that in this instance, as well as all others. We are happy to provide any details on specific state laws if necessary. None of USAC's training materials adequately address these issues, but we have followed any and all guidelines made available.

Trillion is also aware that in the Notice of Proposed Rulemaking dated May 20, 2010, a new rule is being proposed:

"Service providers may not offer or provide gifts, including meals, to employees or board members of the applicant"

This proposed rule is based upon 47 C.F.R. §§ 1.3001, 1.3002, which governs the "Acceptance of Unconditional Gifts, Donations and Bequests" currently in place for Executive Branch Employees, not state or local employees. Trillion fully supports the proposed rulemaking. In February of 2009 and 15 months prior to the NOPR, Trillion instituted a "Trillion Code of Conduct" that prohibits Trillion employees from providing gifts of any form to any governmental employee. We believe that all vendors should be held to the same standard to which Trillion has been holding its employees for over a year. However, it is neither legal nor fair to apply this proposed rule to applicants retroactively.

It is our experience that the occasional provision of meals and entertainment is the industry standard practice engaged in by the majority of service providers. Ex post facto application of new rules to Trillion would raise questions re the legitimacy of many other service providers.

In addition to our concern that the law is being misapplied to Trillion, we have learned that a USAC employee told a Trillion customer that it would be better served by canceling the school district's funding request for Trillion services. An excerpt from this letter Trillion had received cancelling our contract to provide services is as follows:

"In conversations with USAC, we have been informed that these funding requests will be expedited if the request for E-Rate funding for Trillion services is cancelled."

This letter raises serious concerns about the fairness of the USAC review.

Consistent with USAC's corporate charter to "ensure that schools and libraries have access to affordable telecommunications and information services," this situation needs immediate correction. E-Rate funding for prior years should not be denied to applicants on the basis of retroactive application of proposed rules, misapplication of the facts or unduly burdensome audit practices. We are confident that a rigorous evaluation of the law and the facts will vindicate Trillion. However, time is of the essence. Unless these clear errors are not expeditiously corrected, we expect imminent loss of control of our company and the systems serving 600,000 students and 22,000 administrators and teachers in primarily rural and underserved areas will go dark.

Sincerely,

Trillion Partners, Inc.

June 17, 2010

Mr. Scott Barash
Chief Executive Officer
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

Dear Scott,

Thank you very much for the time you and your staff spent with us on the phone last Wednesday. Also, thank you as well for the resources you have allocated to complete the processing of the E-Rate applications for Trillion's customers. Although it appears progress has been made, as we discussed on the phone, USAC appears to have misapplied its own rules and misconstrued or ignored relevant factual information in connection with a large number of these applications. Trillion is on the verge of insolvency and time is of the essence, and therefore we are asking you to reconsider these applications.

Of the 50 applications that USAC reviewed on or prior to June 7, 2010, a full two-thirds (33 applicants) received a letter either indicating an intent to deny or seeking clarifications and that in some form threatened denial. This represents an extraordinarily high ratio of applicants who supposedly did not follow the rules, and is starkly inconsistent with Trillion's historical application approval rate and the results of USAC's comprehensive review of Trillion's customers in 2006.

There appear to be several common themes underlying USAC's preliminary determinations to deny these E-Rate applications. The first theme concerns allowable gifts, gratuities and meals that can be provided to an applicant by a service provider. We discussed this issue in our phone call, where you indicated that a school district must follow state and local procurement rules to be compliant, and acknowledged that the proposed rule put forth in the NOPR dated May 20, 2010 applying a more stringent set of rules around gifts, gratuities and meals has not yet been adopted. Therefore, we believe that all of the letters sent by USAC threatening denial for meals, gifts and gratuities that were within state and local guidelines should be rescinded and the subject applications approved. To do otherwise would have the effect of contradicting USAC's published guidance and retroactively applying a not-yet-adopted new standard in a discriminatory fashion to conduct that was fully compliant at the time. Please refer to our letter of June 8, 2010 for further detail on this issue.

This letter is intended to address the other common themes underlying USAC's prospective denials that we did not have an opportunity to discuss on the phone, which relate to:

- 1) Allowable Form 470-related communications allowable by a vendor

- 2) Allowable communications prior to a Form 470 being posted
- 3) Allowable communications by an incumbent vendor

As demonstrated below, it appears that USAC has not followed its own guidance, has misapplied rules and/or has misinterpreted facts related to these types of communications in connection with these applications.

1) Allowable Form 470-related communications

The following excerpts from USAC training materials published between 2007 and 2010 set out clear rules governing Form 470-related communications between an applicant and a vendor:



Competitive Bidding

- Tips
 - If applicants ask you for assistance:
 - Refer them to existing sources
 - Review all requirements set out by the applicant and follow them
 - Keep records of bids submitted
 - Keep copies of contracts

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www.usac.org

Source: USAC - Overview from the Service Provider Perspective - John Noran - Service Provider Training Schools and Libraries Division - April 18, 2007 – Atlanta • April 25, 2007 – Chicago



Training for Applicants

- You can provide training to applicants on E-rate if your training does not give an unfair advantage
 - Your training can include neutral information, including references to USAC, state, and public websites and training materials
 - Ask yourself if the content of the same training provided by a competitor would concern you

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www.usac.org

Source: USAC - What To Do and How To Do It - Mel Blackwell and John Noran - Service Provider Training Schools and Libraries Division - May 8, 2008 – Miami • May 14, 2008 – Salt Lake City



Pre-bidding Discussions

- Service providers may:
 - Discuss their product offering with applicants
 - Educate applicants about new technologies
- Service providers may **NOT**:
 - Offer/provide vendor-specific language for RFP or the Form 470
 - Provide template RFPs or Forms 470
 - Offer/provide assistance with Tech Plan
 - Offer/provide assistance with RFP

4

www.usac.org

Source: USAC - Program Compliance for Service Providers - Catriona Ayer - Schools and Libraries Division - May 4, 2010
– Los Angeles • May 11, 2010 – Tampa



Competitive Bidding

- What is a service provider's role in the competitive bidding process?
 - Review posted Forms 470 and/or download Form 470 summary information
 - Respond to Forms 470/RFPs
 - Review applicant requirements and local and state procurement rules, including reasons for possible bid disqualification

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www.usac.org

Source: USAC- Beginners Session for Service Providers - John Noran - Service Provider Training
Schools and Libraries Division - May 4, 2010 – Los Angeles • May 11, 2010 – Tampa



Requirements - Competitive Bidding

- The applicant must conduct a fair and open competitive bidding process
 - All bidders are treated the same
 - All bidders have equal access to information
 - All bidders know what is required of them
 - All bidders know any reasons for disqualification

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www.usac.org

Source: USAC - Application Process - Schools and Libraries Division - Washington, DC • Seattle • Denver • Chicago • Newark • Los Angeles • Atlanta September/October 2008

To summarize this guidance, a service provider may not assist an applicant in the completion of a Form 470 or offer or provide vendor-specific language for a Form 470. A service provider may offer E-Rate education if the training is neutral in nature and does not provide an unfair advantage to the service provider. If asked for assistance by the applicant in completing a Form 470, the vendor should refer the applicant to existing resources. Once the Form 470 is filed, vendors are allowed to review the form, evaluate its requirements and ask clarifying questions so long as the answers provided by the applicant are available to all potential bidders.

As described in detail in our prior letters to Mel Blackwell of USAC dated April 17, 2009 and June 8, 2009, Trillion employees have been trained extensively regarding these requirements. Trillion has a long-standing policy requiring its employees to direct all E-Rate questions from an applicant to the company's internal E-Rate attorney or E-Rate specialist, who in turn have procedures in place to direct applicants directly to the USAC website for assistance.

Despite its published guidance, it appears that USAC has taken the position that virtually any communication between a vendor and applicant regarding a Form 470 is a basis for denial. An example of this is the letter received from USAC by St. Louis County Library dated June 2, 2010, which alleges that Trillion provided improper assistance to the applicant.

St. Louis County Library posted its Form 470 on August 29, 2008. The first communication between Trillion and the applicant, which occurred after the posting on or about September 8, 2008, is as follows:

"Dear Mr. Fejedelem ,
>

> I am contacting you to request a copy of the RFP referenced on the 470
> Application # 738980000679314 recently filed by St Louis County Library.
>
> Can you please forward me a copy of the RFP?
>
> Trillion is the leading provider of Broadband WAN and Voice over IP services for K-12 education.
>
> In addition to WAN services, Trillion offers a VoIP service that is Priority 1 E-Rate eligible and is enabling K-12's to enhance safety and communication in their schools with no install costs, money down, equipment purchases or maintenance fees.
>
> After reviewing the RFP, I would appreciate the opportunity to speak with you for a few minutes by phone to better understand the Broadband and IP Telephony needs for the your school district.
>
> Thank you very much,
>
> ** Jeanne Massey **
>
> * Trillion Partners, Inc. *
>

In support of its preliminary determination, USAC cites the following e-mail exchange:

"9/24/2008 1:45PM

Jake,

Just a couple of questions...

- 1) You have a total of 325 phones. Does the distribution matter, or do you want them to spread evenly across the 20 sites? Same question for the 25 extra voice mail boxes.
- 2) Are you going to want/need to keep all of the other ports (fax lines, data, TDD, etc) that are listed in the RFP?
- 3) Any idea what types of phones and in what quantities you will want at each site (basic users, mid-level admins, high-end execs)?

I think this is all I need. Thanks.

John

9/24/2008 3:07PM

Jake,

One other thing that we just discovered... you did not check the box seeking a multi-year contract (7b) on your 470. Was that intentional or an oversight?

John Masterson

9/25/2008 9:17AM

John,

Multi-year contract was an oversight. We would be seeking a multi-year deal.

Enclosed is the telephone breakdown list (the number of jacks we have at each location).

Most sites will have basic user phones (cordless if possible). For high level execs, call forwarding to cell device is of far more importance than the type of desk phone.

-Jake

10/2/2008 3:04PM

Jake,

Would you please call me at your earliest convenience 913-269-7174. I want to make sure we're on the same page regarding your new 470. Thanks!

John"

As USAC indicates, the only difference (other than the due date) between the original Form 470 and the new Form 470 posted on October 13, 2008 was that the multi-year box was checked.

The salient facts related to this application, as demonstrated by the communications set forth above, are as follows:

- Trillion was not in contact with this prospect prior to the posting of its original Form 470
- Trillion asked for the RFP via e-mail after the original Form 470 was posted.
- Trillion asked clarifying questions in order to better understand the service requirements (such as phone count by site) and asked whether the applicant was actually seeking a one-year term
- The applicant discovered its mistake and corrected the error by filing a new Form 470
- The RFP requirements and services requested were unchanged in the new Form 470
- Trillion had no agreement or understanding with the applicant of any kind

With this set of facts, Trillion is unsure as to how the USAC reviewer came to the following conclusion:

"These e-mail exchanges suggest that it was pre-determined that St. Louis County Library would enter into a new contract with Trillion prior to the Form 470 being posted and prior to the 28 day competitive bidding

window. It also suggests that Trillion was intimately involved in developing the specifications the library would seek on its Form 470 and perhaps was involved in the drafting of the language to be used in the Form 470.”

There is simply no basis for a conclusion that a contract was predetermined as a result of Trillion’s routine communications. Trillion could not have been involved in the development of the project specifications because those specifications were in the RFP which Trillion received only after the original Form 470 was posted and those specifications did not change from original to final Form 470 posting. It is obvious that Trillion’s clarifying questions led the applicant to discover an error in its original Form 470 that was subsequently corrected. These communications speak for themselves and do not support any reasonable interpretation to the contrary.

The St. Louis County letter is just an example of the flawed logic employed in a number of “intent to deny” letters based on Form 470-related communications with Trillion customers where:

- The reviewer incorrectly interpreted the proper chronology
- The decision is inconsistent with USAC rules and guidance
- The “facts” relied upon by USAC are incorrect
- The wording in the filed Form 470 uses language directly from USAC’s Eligible Services List
- The services requested are clearly open to many bidders

We urge USAC to revisit these applications with a view to applying a consistent and understandable standard that is consistent with its published guidance.

2) Allowable communications prior to Form 470 posting

With regard to marketing, product demonstrations and similar communications with a prospective applicant prior to the posting of a Form 470, USAC has offered the following guidance:



USAC
Universal Service Administrative Company
Helping Keep Americans Connected

DO's

- Provide information to applicants about products or services – including demonstrations – before the applicant posts the Form 470
 - You can provide information on your available products and services before applicants file a Form 470
 - Once the Form 470 has been filed, you are limited to the role of bidder

4

www.usac.org

Source: USAC - Service Provider DO's and DON'Ts - Mel Blackwell and John Noran - Service Provider Training Schools and Libraries Division - April 18, 2007 – Atlanta • April 25, 2007 – Chicago



USAC
Universal Service Administrative Company
Helping Keep Americans Connected

Training for Applicants

- You can provide information to applicants about products or services – including demonstrations – before the applicant posts the Form 470
- Once the Form 470 has been filed, you are limited to the role of bidder

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www.usac.org

Source: USAC - What To Do and How To Do It - Mel Blackwell and John Noran - Service Provider Training Schools and Libraries Division - May 8, 2008 – Miami • May 14, 2008 – Salt Lake City



Pre-bidding Discussions

- Applicants may:
 - Discuss their product offering with SPs
 - Learn about new technologies from SPs
- Applicants may **NOT** accept/use the following from service providers:
 - Vendor-specific language for RFP or the 470
 - Template RFPs or Forms 470
 - Assistance with tech plan
 - Assistance with RFP

4 www.usac.org

Source: USAC - Program Compliance - Helping You Succeed Schools and Libraries Division - Washington, DC • Newark • Atlanta • Chicago • Orlando • Los Angeles • Portland • Houston - September/October 2009



Pre-bidding Discussions

- Service providers may:
 - Discuss their product offering with applicants
 - Educate applicants about new technologies
- Service providers may **NOT**:
 - Offer/provide vendor-specific language for RFP or the Form 470
 - Provide template RFPs or Forms 470
 - Offer/provide assistance with Tech Plan
 - Offer/provide assistance with RFP

4 www.usac.org

Source: USAC - Program Compliance for Service Providers - Catriona Ayer - Schools and Libraries Division - May 4, 2010 – Los Angeles • May 11, 2010 – Tampa

To summarize this guidance, prior to the posting of a Form 470, a vendor is allowed to provide general information regarding the vendor's products and services, discuss and answer questions regarding its product offering¹, and provide product demonstrations², including an illustration or visual representation

¹ American Marketing Association definition: *A bundle of attributes (features, functions, benefits, and uses) capable of exchange or use; usually a mix of tangible and intangible forms. The terms and conditions (price, quantity, delivery date, shipping costs, guarantee, etc.) under which a product or service is presented to potential customers*

Blue Mine Group definition: Product Offering has 5 key elements which include the product definition, customer experience, product pricing, collaboration, and differentiation.
http://www.blueminegroup.com/articles/1_winning_product_offering_020810.php

² American Marketing Association definition: *An aspect of the sales presentation that provides a sensory appeal to show how the product works and what benefits it offers to the customer*

of how a prospective applicant's network might be configured as well as generic pricing and other indicative terms.

In many instances, however, USAC has used permissible pre-Form 470 communications as the basis for potential denial of applications filed by Trillion's customers. An illustrative example is the letter to Nogales Unified School District 1 dated June 9, 2010. This letter states:

“Correspondence provided by you shows that there were several discussions beginning January 2006 which predate the filing of the Fund Year 2008 Form 470 used to establish a new contract with Trillion. The Form 470 used to establish this contract with Trillion was posted October 26, 2007. The correspondence that predates that Form 470 shows that discussions took place between Trillion, yourself, and other members of your entity or state entity. These discussions included, among other things, the following:

- *Meetings occurred discussing possible WAN options Trillion can offer- January and February 2006*
- *Trillion providing a design and preliminary price estimate- February 2006 and April 2007*
- *Discussions to follow-up on the preliminary estimate provided by Trillion –June 28, 2007*
- *Meetings with Trillion Sales representatives- August 2007*
- *Meetings to discuss funding - September 2007*

A copy of these email exchanges are attached for your review. These email exchanges suggest it was pre-determined NOGALES UNIFIED SCHOOL DIST 1 would enter into a new contract with Trillion prior to the Form 470 being posted and prior to the 28 competitive bidding window. It also suggests Trillion was intimately involved in developing the specifications you would seek on your Form 470.”

The reviewer fails to mention that, on January 12, 2006, Nogales School district posted a Form 470 (# 884590000574746) for the services that Trillion offers. The reviewer also fails to mention that Trillion's first contact with Nogales was after the Form 470 was posted. Therefore, Trillion had every right to act as a bidder, provide a proposal and clarify its proposal as the e-mail record suggests. It should be noted that Trillion did not win this bid.

During the one-year period from June of 2006 until the end of June 2007, Trillion met with the school district a total of five times, none of which occurred during a bid cycle. Trillion provided product offering information to a prospective customer

as well as a preliminary design and price estimate. Keep in mind that Trillion participated in a previous bid cycle that Trillion did not win and had information from this bid cycle on which to base its estimate. USAC guidance establishes that Trillion has the right to discuss its product offering with a prospective applicant, and the chronology identified by USAC merely confirms that these permissible discussions occurred.

It is standard industry practice to provide product quotations to potential customers. In the normal course of business, school districts across the country ask for budgetary information and service providers routinely respond to these requests. Sometimes a price quotation is in the form of a tariff and other times in the form of a budgetary estimate, all of which are well within the definition of “product offering information.”

There is no data whatsoever indicating that a contract was “pre-determined” for Trillion. Keep in mind that the applicant’s Form 470 requested *“Digital Transmission Services - Wireless or Fiber Optic based: Leased Wireless or Fiber Optic Based WAN for eleven campuses including District Office Hub”*. At the time of this bid cycle, Trillion only offered Wireless WAN and did not offer Fiber WAN services. If the outcome was pre-determined for Trillion, presumably the applicant would have requested wireless WAN services only. To the contrary, publicly available data shows that there were multiple bidders for this project that included both wireless and fiber providers.

The summary of the facts are as follows:

- Trillions first communication occurs after the applicant files a Form 470, and Trillion is not selected on that bid
- Trillion met with the school district several times over an almost two year period to discuss its product offering, all of which is allowable under USAC rules
- There are no USAC rules which limit the number of times a service provider can meet with an applicant.
- No communication whatsoever over that two-year period indicates a contract is pre-determined
- Trillion does present a pre-design and budgetary estimate, which is allowable under USAC rules
- There is no communication at all between the parties regarding any Form 470 posting
- The Form 470 posting is fair and open and is inclusive of competitive services that Trillion could not provide

With this set of facts, we cannot see how the reviewer could have possibly come to the conclusion that a decision was pre-determined and that Trillion provided impermissible guidance on the applicant’s Form 470. It is clear that, in this case and in other similar cases, USAC has drawn the incorrect and unwarranted

conclusion that routine contact with a potential applicant is a basis for denial in direct contravention of its own guidance.

3) Allowable communications by an incumbent vendor

Although this theme is very similar to the prior theme and is governed by the same set of rules, there is a fundamental difference in the relationship between an applicant and an incumbent provider in that the incumbent provider will necessarily have numerous communications with the applicant regarding the existing services provided and is the logical provider of choice when the applicant seek service additions or upgrades. As a practical matter, a new vendor will often be precluded from providing service additions upgrades due to technical problems and other inefficiencies associated with having multiple service providers on the same project. This problem arises in many scenarios, including MPLS WAN networks, large-scale layer 3 WAN networks, and interconnection VOIP expansion.

In the case of an MPLS network, if an applicant wanted to add a site or increase bandwidth to only a portion of the network, only the incumbent can offer this solution. The primary reasons are the technical limitations of an MPLS network. In an MPLS WAN, if any changes are going to occur to that network, no other alternative service provider's network will actually work with the incumbent's network. Therefore, without a wholesale change to the entire network, bandwidth upgrades to individual sites, as well as site additions to the network, can only be done by the incumbent MPLS provider. Significant issues with an alternative provider would come into play, such as the requirement for duplicative equipment and software, loss of network security and quality of service, the need to hand off traffic between providers and the requirement for "out of band" internet monitoring.

Similar issues arise with large-scale layer 3 WAN networks. If there is a network covering a large area serving multiple locations with network-wide routing, there is really no technical difference between this type of network and an MPLS network. Therefore, if an applicant were seeking bandwidth upgrades to a portion of the network, or if new sites were to be added, the only viable provider is the incumbent. For interconnected VoIP expansion, there are similar technical issues. Where an incumbent is providing phone service to the administrative offices, if an applicant seeks to add phone connections to the classrooms, it is technically impossible for another service provider to solve this integration, since having multiple providers would require management of two completely disparate systems with duplicative reporting and a loss of control between the systems. Therefore, if an applicant files a Form 470 for additional connections to have phones in every classroom, the bid is technically limited to the incumbent unless there is a wholesale change of the entire phone system.

In any of the three scenarios, due to the technical limitations and impracticalities,

the applicant must rely on the incumbent provider. Keep in mind that the incumbent provider by definition has critical knowledge that alternative providers do not. An incumbent can see the applicant's network statistics, how much bandwidth is being utilized, where the bottlenecks are, and what can be done to improve performance. If an incumbent service provider realizes that a portion of a network is running to capacity, there is every reason to inform the applicant of this fact. No guidance is provided by USAC in this case, but it would seem to be in the best interest of the applicant for the service provider to provide this useful information.

USAC fails to recognize the practical realities of the incumbent provider scenario. An illustrative example is a letter from USAC received by Northeast Texas Regional Education Telecommunications Network (NTRETN) dated June 4, 2010. In this letter, USAC indicates its intent to deny the application because NTRETN engaged in numerous discussions with Trillion employees beginning in 2004 through the award of multiple contracts. USAC claims that these discussions were not general marketing discussions, and further claims that Trillion was provided inside information with regard to the applicant's needs.

In order to put USAC's claims in context, it is important to provide some background regarding NTRETN and the services Trillion provides to it. NTRETN is a consortium of school districts located in Texas' Region 8 Education Service Center (ESC). The Region 8 ESC is one of 20 education service centers in Texas. The vision of Region 8 is "to develop a district-wide systemic culture to sustain a high-performing learning community." To achieve this vision, Region 8 delivers a variety of services, including distance learning, to each school district it serves. To provide these services, the NTRETN consortium was established to deliver a sustainable wide area network (WAN) in rural Northeast Texas to serve the schools in the Region 8 ESC area. NTRETN consists of 51 school districts in northeast Texas, including 150 campuses, with over 150,000 students. The majority of its member school districts are located in rural communities. NTRETN has an elected board of directors consisting of 12 school district superintendents and the Region 8 ESC Executive Director.

Trillion provides a customized network for NTRETN that links together school districts across a large, rural portion of Texas. The project to build the NTRETN was massive in scope because the network was required to cover over 9,000 square miles of geographic terrain. Trillion's network for NTRETN services 88 locations, 652 route miles (covering 9,000 square miles), and has three connections, or points of presence (POPs), out to the Internet.

To date, the implementation of this network has involved an investment of \$5,865,597 in capital expenditures. It has required heavy construction in school yards, coordination of utility services, adherence to strict safety guidelines, management of network addressing and protocols and much more. In fact, the project was so large and complex that it had to be built in two technically distinct

phases over the course of 19 months. Given the project's scope, it required a tremendous amount of interaction and coordination among Trillion's employees and the NTRETN team.

USAC does not take into account that a project of this magnitude requires constant communication between the parties in order to be successful, which type of communication is in accordance with USAC guidelines. USAC also does not take into account the fact that it is nearly impossible from a technical standpoint for another service provider to provide bandwidth upgrades to a portion of this comprehensively routed and managed IP network without a complete replacement of the entire network.

In regards to the communication record, in the original build of NTRETN's network, not all of the NTRETN member school districts were connected to the network. The neighboring consortium, Region 10, also had not provided adequate Internet and WAN services to its member school districts. As a result, NTRETN had received inquiries from neighboring school districts regarding the technical feasibility of adding schools to the then-existing network. There is also mention in the e-mails of the need for additional bandwidth and NTRETN's interest in an assessment of the technical feasibility of adding a 3rd POP in Texarkana. NTRETN wanted to understand whether Trillion could expand the existing network to accommodate the additional school districts, including Region 10 schools, and whether this additional usage would negatively impact the existing network.

These inquiries are analogous to inquiries that a school district might make of its incumbent communications provider to assess whether a T-1 could be provided to connect to an additional site that is not served, whether additional capacity could be added to an existing MPLS circuit, or whether an additional T-1 of Internet capacity could be added to a currently-served site. Discussing the technical feasibility and impact of adding a T-1 to a site does not run afoul of a fair and open bidding process, and nor does discussing the feasibility and impact of adding an additional site to an existing network. These type of questions are commonplace in the industry and are part of a normal dialogue between an applicant and its existing service provider. To require otherwise would be highly inefficient and counter-productive.

The relevant facts with respect to NTRETN are as follows:

- The NTRETN network is massive, covering 9,000 square miles
- The school districts served are generally very rural
- Over \$5,000,000 in capital has been invested in the network
- An applicant is allowed to ask the technical feasibility of network upgrades
- The communication record shows normal discussions between an applicant and an incumbent who provides such a complex network
- There are technical limitations on the ability of another service provider to

connect to a single site or upgrade only segments of the network without complete replacement of the entire network

With this set of facts, we do not see how the reviewer can come to the conclusion that anything but normal course discussions took place between an applicant and their incumbent service provider. Denial is particularly unwarranted in cases of this type since the result would be to force the applicant to make an economically inefficient choice of an alternate provider or to forego the requested services entirely.

Summary

Trillion understands that setting a deadline can force hasty, premature decisions. The preliminary determinations of USAC to deny Trillion's customer applications cannot withstand even casual scrutiny as they contravene USAC's own guidance and are based on numerous factual errors. These determinations are clearly motivated by a desire to "move the pile" rather than an effort to get at the real facts and to fulfill the purposes of the E-Rate program.

Unfortunately, we are now out of time. While these errors can conceivably be remedied on appeal, our company will likely not be alive to see the end of that process. The sad part is that the ones really being hurt in this process are the students of the rural and underserved areas of this country that Trillion serves. Don't let these kids be without the technology that keeps them on the same playing field as the urban kids. We urge you to direct your staff to withdraw these ill-considered "intent to deny" letters and to make thoughtful determinations on the merits of these cases.

Sincerely,

Trillion Partners, Inc.



Telecommunications Services Statement of Work

Prepared for:

Presented by:
Trillion
DATE

Revision History:
Original 12/17/04



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Introduction

Trillion is pleased to present CLIENT (“DISTRICT”) with this Statement of Work (“SOW”) document providing specific details regarding the implementation of your new Trillion wireless broadband services. The Trillion SOW is delivered to all Trillion customers following completion of the data gathering phase of the project and prior to the commencement of any on-site construction, implementation or delivery of services. In short, the Trillion SOW provides DISTRICT with detailed information relating to the delivery of Trillion services as defined in the mutually agreed upon Telecommunications Service Agreement. This SOW is designed to ensure the success of the project and is not intended to supplant or modify the Telecommunications Services Agreement in any manner.

Successful implementation of Trillion telecommunications services requires DISTRICT to take a pro-active role in completely understanding the SOW and all aspects of the Trillion service delivery process, including the specific roles and responsibilities of both parties, as defined herein.

DISTRICT should take care to thoroughly review this and all future versions of the SOW and related documents to ensure accurate Trillion interpretations and representation of both Trillion and DISTRICT provided information.

Service Activation Date

Target Service Activation Date =

DISTRICT understands that Trillion will do everything possible to meet the desired service activation date, and that DISTRICT’s ability to play an active role in understanding the SOW and complying with specific DISTRICT roles and responsibilities has a direct impact on this process.

Project Manager & Project Contacts

Trillion Project Manager –

DISTRICT is responsible for providing the Trillion Project Manager with current contact information for all DISTRICT project personnel, including:

- DISTRICT Executive Sponsor –
- DISTRICT Project Manager –



- DISTRICT Facilities Manager
- DISTRICT WAN Manager –
- DISTRICT Emergency Contacts –
- Technical Support Contacts -.

The first version of this SOW includes a Trillion Project Contact Sheet, (Exhibit “9”) with current contact information, to date, as provided by DISTRICT.

DISTRICT is responsible for providing the Trillion Project Manager with timely and accurate contact updates at all times.

A soft copy of the Project Contact Sheet will be provided to DISTRICT and all updates should be provided to the Trillion Project Manager via email as needed.

The Trillion Project Manager will provide all project contacts with timely soft copy updates as needed.

DISTRICT Responsibilities

Telecommunications Services Exceptions

Project Phases

1. Contract execution –
2. Data Gathering –
3. Statement of Work –
4. Service Delivery Phase 1



5. Testing & Acceptance Phase 1

Change Management

Meetings & Updates

Regular communication by and between project members are a must for project success and ensure a formal venue for status and problem reporting.

The Trillion Project Manger is responsible for communicating dates and times of all project meetings to all required attendees.

The Trillion Project Manager will maintain detailed notes at each project meeting and provide written minutes of each meeting to all project members as needed.

Proposed Status Meetings:

Meeting Type	Date / Time	Attendees
Construction Kick-Off		
Construction Update		
Network Services Data Gathering (Phase 1)		
Training	TBD	
Acceptance (Phase 1)		

Trillion Deliverables

Statement of Work Acceptance.



DOCUMENT NAME
PROJECT NAME
Document ID XXXXX
DATE

EXHIBITS

- Exhibit 1 - Project Timeline
- Exhibit 2 - Logical WAN Design
- Exhibit 3 - Site Pole Location Diagrams
- Exhibit 4 - Layer3 Logical Route Diagram
- Exhibit 5 - IP Database
- Exhibit 6 - POP Location & Network Services Logical Diagrams
- Exhibit 7 - Statement of Work Acceptance Form
- Exhibit 8 - Change Management Request
- Exhibit 9 - Project Contact Sheet
- Exhibit 10 – Certification Test Plan
- Exhibit 11 – Wireless WAN Description Ph1 Sites
- Exhibit 12 – Phase Implementation Map
- Exhibit 13 – Network Bandwidth Diagram

Agenda & Sessions

Breakout Sessions

Note: This is a partial Breakout session listing and schedules are subject to change.

Breakout session schedule last updated on 08/21/2006 at 9:13 PM (PDT).

Tuesday, October 31st, 2006

- | | | |
|-------------------|--|--------------------------------|
| 1:00 PM - 1:50 PM | Affordable Broadband Strategies for Education
<i>Presented by Kevin Matteson, Network Services Manager, Tulare County Office of Education</i>
From ADSL to dark fiber - schools can use ATM in a myriad of ways | Colton I |
| 1:00 PM - 1:50 PM | Develop a Model Technology Refresh Plan
<i>Presented by Emilia Simoes, Director of Information Services and Technology, San Luis Coastal USD</i>
Showing your district how to leverage its available resources with a long-term refresh plan and funding commitment | Colton II |
| 1:00 PM - 1:50 PM | CASE Tools for Designing and Maintaining Databases
<i>Presented by David Eaton, Oakland Unified School District</i>
Using software tools to enforce data standards and maintain database architecture. | Colton III |
| 1:00 PM - 1:50 PM | Virtualization and Server Consolidation
<i>Presented by Rock Regan / Damon Brown</i>
Virtualization and Server Consolidation | Redwood Room I (Level Three) |
| 1:00 PM - 2:50 PM | Chief Technology Officer Mentor Program - 2hrs
<i>Presented by CETPA, FCMAT - Phil Scrivano, Andrea Bennett</i>
Summary of the CTO Project and Application Process | Steinbeck Forum |
| 1:00 PM - 2:50 PM | Measuring the Value of Technology - 2hrs
<i>Presented by Rich Kaestner, CoSN</i>
CoSN's Total Cost of Ownership and Value of Investment projects | Ironwood Room I (Level Three) |
| 1:00 PM - 2:50 PM | Open Technologies: the Education Enterprise - 2hs
<i>Presented by Jim Klein, SAUGUS UNION SD</i>
Transform the learning landscape in school environments through the use of open technologies | Redwood Room II (Level Three) |
| 1:00 PM - 2:50 PM | Windows Vista Security - 2hrs
<i>Presented by Microsoft</i>
Overview of the next version of Windows | Ironwood Room II (Level Three) |
| 2:00 PM - 2:50 PM | Antelope Valley's Portal & the Community
<i>Presented by Tim House, Teacher and Tech Specialist, Antelope Valley UHSD</i>
Antelope Valley's successful deployment of Edline's enterprise website and portal solution | Colton II |
| 2:00 PM - 2:50 PM | Orange County: Securing Access to Payroll Services
<i>Presented by John Stamper/Doug Walker</i>
Learn how OCDE deployed innovative, low-cost technologies to simplify and strengthen computer and user access to payroll services. | Colton III |
| 2:00 PM - 2:50 PM | Securing the Network From the Inside
<i>Presented by Bill Kelly / Robert Chambers</i>
Today's technologies to secure the interior of the network | Redwood Room I (Level Three) |
| 2:00 PM - 2:50 PM | Fulfilling Our Responsibility/Protect Our Students
<i>Presented by James Anderberg</i>
How Placer County has utilized technology to safeguard the private information of his county's students and faculty. | Colton I |
| 3:00 PM - 3:50 PM | From Zero to Zen in 90 Days
<i>Presented by Richard Kebo, CIO, Clovis USD</i>
Moving to a Linux and Open Source environment generates significant cost-savings | Colton II |

- 3:00 PM - 3:50 PM **LAUSD's Student Information System Implementation** Steinbeck Forum
Presented by Shahryar Khazei, Chief Information Systems Director; Lou Chappuie, VP, LAUSD Project Manager
 The massive challenge of implementing a new SIS in the LAUSD, conventional wisdom had to be challenged and stretched to achieve success.
- 3:00 PM - 3:50 PM **CALPADS: The Future of State Reporting in Calif** Colton I
Presented by Steve Smith, Keric Ashley
 Come learn about California's new data reporting strategy, CALPADS, that will affect every school district in the state
- 3:00 PM - 3:50 PM **DESC for Small to Medium Sized School Districts** Colton III
Presented by Shanda Hahn, Larry Talbert
 Digital equity by providing learners and their educators with affordable and equal access to technologies for lifelong learning
- 3:00 PM - 4:50 PM **Team Building Skills for Project Success-2hrs** Redwood Room I (Level Three)
Presented by Robin Canale
 Skills for selecting, managing, motivating, and rewarding project teams.
- 3:00 PM - 4:50 PM **FCC Enforcement of Radio Frequencies** Redwood Room II (Level Three)
Presented by Catherine Deaton, District Director, FCC
 Listen to California's top expert in radio frequency usage explain how many districts may be out of compliance.
- 3:00 PM - 4:50 PM **Effective Technology Tools for Students - 2hrs** Ironwood Room I (Level Three)
Presented by Dr. George Araya; Mrs. Sally Adams; Dr. Becky Howery; Mrs. Brandi Davis
 Implementation and usage of a SharePoint Portal Service, an Integrated Data Warehouse
- 3:00 PM - 4:50 PM **Intro to 2007 Microsoft Office System - 2hrs** Ironwood Room II (Level Three)
Presented by Microsoft
 An overview of the 2007 Microsoft Office System
- 4:00 PM - 4:50 PM **Conferencing & Collaboration: the K-12 HSN** Redwood Room I (Level Three)
Presented by Alan Phillips
 The K12HSN provides a variety of services related to conferencing at no cost to California's K-12 Schools, including videoconferencing
- 4:00 PM - 4:50 PM **SIF: Strategies to Improve Data Mobility** Steinbeck Forum
Presented by Laurie A Collins
 SIFramework Specification is designed to support the exchange of data between systems
- 4:00 PM - 4:50 PM **Annual CETPA Erate/CTF Update** Colton II
Presented by Fred Brakeman
 Annual Erate/CTF update including recent changes to the programs, best practices, and lessons learned.
- 4:00 PM - 4:50 PM **Special Ed-Introducing Workflow Management Tools** Colton I
Presented by Susan Christensen
 Technical and personal aspects of introducing GENESEA, a web-based IEP and compliance system

Wednesday, November 1st, 2006

- 8:00 AM - 8:50 AM **E-rate for New and Intermediate E-rate Applicants** Redwood Room (Level Three)
Presented by Russ Selken, Patrick McMEnamin, and E-rate Panel
 Technology professionals will explain how to access up-to-date information regarding the federal E-rate program
- 8:00 AM - 8:50 AM **Student Intervention Resources Kit** Ferrante I
Presented by Rick Phelan, John Schiller
 Sonoma County Office of Education Student Intervention Resources Kit
- 8:00 AM - 8:50 AM **Is Your Network Ready - Technology Based Learning** Ferrante II
 *Presented by Jerry Edmonds - Kings Canyon USD and Chris Hobbs - New Haven USD*
 Directors are using wireless wide area networks to support their district's technology education goals

8:00 AM - 8:50 AM	Promethean Interactive White Board <i>Presented by Alice Keeler</i> Promethean ActivBoard along with the ActiVotes and ActivSlate brings the students into the lesson	Ferrante III
8:00 AM - 8:50 AM	CEEDS in Action <i>Presented by Dave Paulson</i> The CEEDS platform provides the very latest in customized portal deployment, data integration, and identity management	Colton I
8:00 AM - 8:50 AM	Learn More About the New CETPA/CoSN Chapter <i>Presented by Keith Kruger and the CETPA Board</i> Hear from the Leadership of CETPA and CoSN on the state's new chapter	Colton II
8:00 AM - 8:50 AM	Increasing Technology Without Breaking the Bank <i>Presented by Carrie Higbie</i> Emerging technologies, how to plan for them and what each means to the bottom line.	Colton III
8:00 AM - 8:50 AM	Wireless: Bringing the Parks to the People <i>Presented by Cathy Reznicek, David Luff, Steve Carr</i> Ventura COE and National Park Service create a wireless learning community combining the best of IT and standards-based educational content.	Ironwood Room (Level Three)
9:00 AM - 9:50 AM	New Web-Based SIS Revelation Technology & .Net <i>Presented by Robert Weathers, Tom McGrew with Microsoft and Long Beach representatives</i> Revelation Technology, a rapid application development tool for creating enterprise data-centric applications.	Redwood Room (Level Three)
9:00 AM - 9:50 AM	Data Warehouse in K-12: a Case Study <i>Presented by Russ Ballati</i> First-hand account of the effort, challenges and process for implementing a data warehouse in a K-12 district.	Ferrante I
9:00 AM - 9:50 AM	An Online School Technology Observation Tool <i>Presented by Randy Schultz</i> Online school observation tool used by school administrators to collect data	Ferrante II
9:00 AM - 9:50 AM	Desktop Management within a K-12 School District <i>Presented by Dan Landon, Jon Lewis</i> The Ontario-Montclair School District has successfully made the move towards a centralized technology structure	Colton III
9:00 AM - 9:50 AM	Organizational Response to Identity Theft <i>Presented by Matthew Kinzie</i> What happens if an Identity Thief stole information from your district?	Colton II
9:00 AM - 9:50 AM	Facing the Challenges - Internet Assisted Learning <i>Presented by Jim Culbert, Information Security Analyst, Duval County Public Schools, FL</i> Internet filtering can help address key challenges schools are facing with internet assisted learning	Colton I
9:00 AM - 9:50 AM	Differentiate Instruction with Online Resources <i>Presented by Andria Humpert & Oswaldo Galarza</i> Supporting differentiated instruction with standards-based online resources.	Ferrante III
9:00 AM - 9:50 AM	Quit Rearranging the Deck Chairs on the Titanic <i>Presented by Linda Uhrenholt</i> What technology liabilities have the potential to sink your district?	Ironwood Room (Level Three)
11:00 AM - 11:50 AM	Firewall Design and Implementation <i>Presented by Tim Bostrom</i> Learn how to properly implement a safe and secure Firewall Design.	Redwood Room (Level Three)
11:00 AM - 11:50 AM	Purchasing Options - A to Z <i>Presented by Fred Brakeman</i> What are your purchasing options to acquire technology within your District.	Colton II

11:00 AM - 11:50 AM	Internet Safety for Kids <i>Presented by Tim Templeton</i> General advice regarding safe Internet access and specific advice from Detective McLaughlin	Ferrante I
11:00 AM - 11:50 AM	Safety through Communications: Systems for K-12 <i>Presented by Paul Rosso</i> Emergency/Crisis Response Plan and communications within a school	Ferrante II
11:00 AM - 11:50 AM	Managing And Protecting Your Computers Made Easy <i>Presented by Vik Khanna</i> Faronics total system control approach to providing a secure and standardized computing environment for students	Colton I
11:00 AM - 11:50 AM	Ed Tech and IT: A Formula for Success <i>Presented by Steve Carr, Warren Williams, Catharine Reznicek</i> Constructive examples and methods for bringing IT and Ed Tech together	Ferrante III
11:00 AM - 11:50 AM	Education Technology Voucher: Microsoft Settlement <i>Presented by Gary Quiring, California Department of Education</i> The rules of the Microsoft settlement and how it impacts products and services to be purchased	Colton III
11:00 AM - 11:50 AM	SharePoint: A Tool for Education <i>Presented by Michael Casey (SDCS) & Microsoft</i> Creating a collaborative eLearning environment	Ironwood Room (Level Three)
1:30 PM - 2:20 PM	The Changing Face of Procurement <i>Presented by Jon Hansen</i> Focuses on the dramatic changes in web-based procurement methodologies and practices	Redwood Room (Level Three)
1:30 PM - 2:20 PM	eDistirct Convergence, Integration, Reengineering <i>Presented by Patrick J. Simon-CTO, Joe Zanini, M&O Director, HUSD, Robert Islander, CEO, VIP Tone</i> A shining example of transformation utilizing technology and collaboration through convergence	Ironwood Room (Level Three)
1:30 PM - 2:20 PM	Internet2: An Inside View <i>Presented by John Fleischman</i> This session is designed to provide a deeper understanding of how the Internet2 is designed and why it is important for California educators	Ferrante II
1:30 PM - 2:20 PM	TechSETS & the Ed Tech K-12 Voucher Program <i>Presented by Bill Simpson, Patty MacIntyre</i> TechSETS has developed an extensive resource page to help support the implementation of the Ed Tech K-12 Voucher Program	Colton I
1:30 PM - 2:20 PM	The SIS Revolution: Web Based Student Information <i>Presented by Charlie Kratch</i> The seamless electronic data transfer of student records from district to district	Colton II
1:30 PM - 2:30 PM	LANDesk: Affordable, Efficient Desktop Management <i>Presented by Bryan Hadzik & Sierra Sands Unified</i> How LANDesk can increase the efficiency and security of your network and IT infrastructure.	Colton III
1:30 PM - 2:20 PM	How the US Compares in Ed Tech Policy <i>Presented by Keith Krueger, CEO, CoSN</i> In depth discussion of how the US is doing when compared to other countries from around the globe.	Ferrante I
1:30 PM - 3:20 PM	Leadership Data Management Best Practices - 2hrs <i>Presented by Nancy Sullivan, Colleen Gordon, Lisa Hayes, Robin Canale</i> Leadership skills and as well as the project management tools and practices to build and sustain local data	Ferrante III
2:30 PM - 3:20 PM	Building the Digital Classroom of the Future <i>Presented by Pat Cassella</i> Create, deliver, and manage digital video and multimedia assets over existing IP networks	Redwood Room (Level Three)

2:30 PM - 3:20 PM	Getting What You Pay For? Security Assessments <i>Presented by John Stampfer, Larry Detar</i> What you should expect from your provider when securing the data collected from your organization.	Ferrante I
2:30 PM - 3:20 PM	SIF - Help Districts Improve Data Interoperability <i>Presented by Laurie A Collins</i> Schools Interoperability Framework Specification and the technology required to implement it	Ferrante II
2:30 PM - 3:20 PM	Crisis Management and the District's Website <i>Presented by Carol Rickert</i> Is your district prepared to communicate effectively during crises	Ironwood Room (Level Three)
2:30 PM - 3:20 PM	The Business Side: Information Security Strategy <i>Presented by Samantha Thomas, Director Information Security</i> How information security can promote privacy and to what extent an organization needs to implement controls	Colton I
2:30 PM - 3:20 PM	WLAN for K12 Supporting Mobile Applications <i>Presented by Bill Kelly / David McLaughlin</i> Next generation wireless infrastructure solutions	Colton II
2:30 PM - 3:20 PM	Managing the Desktop with Restore Points <i>Presented by Mark Dorsch & Dennis Barbata, Charlie Fortes, Mac Cage of Eastside UHSD</i> Effectively monitor and restore faulty computers on the fly	Colton III
3:30 PM - 4:20 PM	Improving Student Achievement: Edline's Website <i>Presented by Marge Abrams</i> Edline improves student performance by providing student and parent access to critical information such as homework, grades, attendance, transcripts	Redwood Room (Level Three)
3:30 PM - 4:20 PM	Digital Storytelling - Power of the Student Voice <i>Presented by Scott Smith, Mark Blanton</i> Students use free video editing software to create movies that showcase their storytelling abilities	Ferrante I
3:30 PM - 5:20 PM	Data Mgmt-System Integration:Best Practices - 2hrs <i>Presented by Nancy Sullivan, Colleen Gordon, Lisa Hayes, Robin Canale</i> Session will focus on best practices for collecting, maintaining, reporting and using data	Ferrante III
3:30 PM - 4:20 PM	MyTechDesk: Workorder Management Made Easy <i>Presented by Bill Simpson, Patty MacIntyre</i> MyTechDesk, an easy-yet-powerful, web-based workorder management system, which is available at no cost	Colton II
3:30 PM - 4:20 PM	Checklist for aSuccessful District Web Site <i>Presented by Steve Thornton, Mohsen Attaran</i> Tips to help design a functional, consistent, and well-designed Web presence	Ironwood Room (Level Three)
3:30 PM - 4:20 PM	Integrated Communication Systems <i>Presented by Mark Gross, CEO School Loop & Matt Woods, Network Director, Long Beach Unified</i> Review the successful implementation of a new integrated communication system in a large, urban school district.	Colton III
3:30 PM - 4:20 PM	Raising Student Achievement by Streamlining Data <i>Presented by Michael Akins, Dir Technology, Dinuba USD & DeAnna Gallagher</i> Key integration strategies surrounding student performance data	Colton I
3:30 PM - 4:20 PM	Using SIF Integration to Streamline Operations <i>Presented by Aziz Elia and Max Eissler</i> How SIF is helping Oakland Unified School District streamline operations and network account management.	Ferrante II
4:30 PM - 5:20 PM	Security Web-Based Applications: Pre-planning <i>Presented by Matt Woods</i> A discussion on security and web-based applications	Ferrante I

4:30 PM - 5:20 PM	Messaging & Collaboration: Microsoft Forefront <i>Presented by Dan Sommerman</i> Comprehensive set of security and secure access solutions across client, server, and edge.	Redwood Room (Level Three)
4:30 PM - 5:20 PM	The Education Landscape-Open Source, Open Minds <i>Presented by Bernard Burchette</i> Using the FEDORA and Sakai open source frameworks, Construct!, provides schools with a digital object repository and course management system	Ironwood Room (Level Three)
4:30 PM - 5:20 PM	Board Members & Student Performance Gains <i>Presented by Dale Russell, Ed.D.</i> Practices that show how effective program planning precedes sustainable student performance improvements	Ferrante II
4:30 PM - 5:20 PM	Managing District Assets: What You Need To Know <i>Presented by Dr George Araya (Desert Sands), Rich Kaestner (CoSN), Don Rokusek (Follett Software Co)</i> Practical discussion on how Follett Software's new Educational Resource Management Platform (ERM) has helped Desert Sands School	Colton I
4:30 PM - 5:20 PM	Student Email Is Coming...Is IT Ready? <i>Presented by Jeff Patterson</i> Important network security issues which districts have overcome using Gaggle, other products, and home grown systems	Colton II
4:30 PM - 5:20 PM	Content Management for Everyone <i>Presented by David Lam</i> A successful Web presence has now become having dynamic web pages	Colton III

Thursday, November 2nd, 2006

No Breakout sessions exist for Thursday, November 2nd, 2006.

Friday, November 3rd, 2006

8:30 AM - 9:20 AM	SQL Server Performance and Security Optimization <i>Presented by David Eaton</i> Performance monitoring and optimization from the server hardware up through the OS	Ferrante I
8:30 AM - 9:20 AM	E-rate Program Updates Intermediate & Advanced <i>Presented by Russ Selken, Patrick McMenamin, and E-rate Panel</i> Focus on important new developments in E-rate application and documentation procedures.	Redwood Room II (Level Three)
8:30 AM - 9:20 AM	Open and Closed Source Solutions: Working Together <i>Presented by Steve Midgley</i> How open source is being used effectively, and how it can be integrated	Ferrante II
8:30 AM - 9:20 AM	Principalm: Palm and Windows Mobile, Student Data <i>Presented by Matthew Darshay</i> View student information on their PalmPilot or PocketPC hand held device	Ferrante III
8:30 AM - 9:20 AM	IT Asset Management <i>Presented by Kent Hudson</i> Major trends and breakthroughs in IT Asset Management (ITAM) and the emerging technology	Steinbeck Forum
8:30 AM - 9:20 AM	Next Generation of IP Paging, Bells and Clocks <i>Presented by Jon Threshie and Ken Bywaters</i> Centrally managed, network-based system for all school paging, bells and clocks	Ironwood Room I (Level Three)
8:30 AM - 9:20 AM	Schoolloop: Putting Everyone Into the Loop <i>Presented by Alice Keeler</i> Website that allows parents, teachers, students, administrators and staff to be better connected	Bonzai I

8:30 AM - 9:20 AM	Mobile Student Data Integration and Benefits <i>Presented by Martin Danko</i> Benefits of using an Integrated PDA application with your Student Information System	Bonzai II
8:30 AM - 9:20 AM	Document Management Doing More with Less <i>Presented by James Pappas, Debbi Richards</i> Utilization of Document Management to maintain a records management structure	Redwood Room I (Level Three)
8:30 AM - 9:20 AM	Introduction to Converged Networking <i>Presented by Dan Rivera & Marko Rogan</i> This session will detail what converged networking is, which applications can be blended into converged networking	Ironwood Room II (Level Three)
8:30 AM - 10:20 AM	Ed Tech and IT: Necessary Partnership 2hrs <i>Presented by Practicing directors and administrators from various districts and COE's.</i> Discussion of IT and Ed Tech Need for Collaboration	Bonzai III
9:30 AM - 10:20 AM	Student Centered Technology Support <i>Presented by Mark L. Miller, Ph.D., Executive Director & Alice Marie Miller, Director, California Charter School</i> Session will provide a down-to-earth look at involving students in supporting their school's technology program	Ironwood Room II (Level Three)
9:30 AM - 10:20 AM	Top 10 Free Programs Every Teacher Should Have <i>Presented by Scott Smith</i> Demonstrations of the most valuable free classroom software resources	Redwood Room II (Level Three)
9:30 AM - 10:20 AM	K12 Portals and Remote Access with webNetwork <i>Presented by Ken Quinton</i> Presentation of Stoneware's webNetwork	Ferrante I
9:30 AM - 10:20 AM	Introducing SIFA University <i>Presented by Laurie A Collins</i> Latest additional to the suite of tools provided by the SIF Association	Ferrante II
9:30 AM - 10:20 AM	Deploying WiFi Securely and Consistently <i>Presented by Jon Threshie and an Extrateam Technical Representative</i> share design criteria, costs, installation, and ongoing status of Cisco Aeronet wireless access points	Steinbeck Forum
9:30 AM - 10:20 AM	TechSETS: Your "Always On" Tech Support Center! <i>Presented by Bill Simpson, Patty MacIntyre</i> TechSETS is a state-funded project that provides technical support resources	Redwood Room I (Level Three)
9:30 AM - 10:20 AM	CTAP: Providing Technology Assistance to Schools <i>Presented by Marianne Pack</i> CTAP provides services to help schools improve teaching and learning through the effective use of technology in the curriculum	Ironwood Room I (Level Three)
9:30 AM - 10:20 AM	Internet Safety and Our Children <i>Presented by Joel Heinrichs</i> Parents and administrators are the appropriate arbiters of a child's Internet experience	Bonzai I
9:30 AM - 10:20 AM	Clearinghouse for Multilingual Documents <i>Presented by Rod Atkinson / Wayne Shimizu</i> School districts can access information and links for parental notifications translated into non-English languages	Bonzai II
9:30 AM - 10:20 AM	Email Security: More Than Just Blocking Spam <i>Presented by Dan Exelby, SCOE</i> How to protect your organization from the high costs of spam.	Ferrante III

470

Schools and Libraries Universal Service Description of Services Requested and Certification Form

Estimated Average Burden Hours Per Response: 4.0 hours

This form is designed to help you describe the eligible telecommunications-related services you seek so that this data can be posted on the Fund Administrator website and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before beginning this application.

(To be completed by entity that will negotiate with providers.)

Block 1: Applicant Address and Identifications

Form 470 Application Number: 570490000528924

Applicant's Form Identifier: KCD470Y8-02

Application Status: CERTIFIED

Posting Date: 01/03/2005

Allowable Contract Date: 01/31/2005

Certification Received Date: 02/17/2005

1. Name of Applicant:

KINGS CANYON UNIF SCHOOL DIST

2. Funding Year:

07/01/2005 - 06/30/2006

3. Your Entity Number

144054

4a. Applicant's Street Address, P.O.Box, or Route Number

675 W MANNING AVE

City

REEDLEY

State

CA

Zip Code

93654-2427

b. Telephone number

(209) 637- 1200

c. Fax number

(209) 637- 1292

d. E-mail Address

5. Type Of Applicant



Individual School (individual public or non-public school)



School District (LEA;public or non-public[e.g., diocesan] local district representing multiple schools)



Library (including library system, library branch, or library consortium applying as a library)



Consortium (intermediate service agencies, states, state networks, special consortia)

6a. Contact Person's Name: Emerson Tripoli

First, fill in every item of the Contact Person's information below that is different from Item 4, above. Then check the box next to the preferred mode of contact. (At least one box MUST be checked.)

6b. Street Address, P.O.Box, or Route Number



4122 East Feemster

City

Visalia

State

CA

Zip Code

93292



6c. Telephone Number (559) 280- 0002



6d. Fax Number (559) 741- 0481



6e. E-mail Address etripoli@altanetworks.com

Block 2: Summary Description of Needs or Services Requested

7 This Form 470 describes (check all that apply):

- a. Tariffed services - telecommunications services, purchased at regulated prices, for which the applicant has no signed, written contract. A new Form 470 must be filed for tariffed services for each funding year.
- b. Month-to-month services for which the applicant has no signed, written contract. A new Form 470 must be filed for these services for each funding year.
- c. Services for which a new written contract is sought for the funding year in Item 2.
- d. A multi-year contract signed on or before 7/10/97 but for which no Form 470 has been filed in a previous program year.

NOTE: Services that are covered by a signed, written contract executed pursuant to posting of a Form 470 in a previous program year OR a contract signed on/before 7/10/97 and reported on a Form 470 in a previous year as an existing contract do NOT require filing of a Form 470.

What kinds of service are you seeking: Telecommunications Services, Internet Access, or Internal Connections? Refer to the Eligible Services List at www.sl.universalservice.org for examples. Check the relevant category or categories (8, 9, and/or 10 below), and answer the questions in each category you select.

8 Telecommunications Services

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a. YES, I have an RFP. It is available on the Web at www.altanetworks.com/erate/8/kcusd.htm or via (check one):
 the Contact Person in Item 6 or the contact listed in Item 11.

- b. NO , I do not have an RFP for these services.

If you answered NO, you must list below the Telecommunications Services you seek. Specify each **service or function** (e.g., local voice service) and quantity and/or capacity(e.g., 20 existing lines plus 10 new ones). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Telecommunications Services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism. Add additional lines if needed.

9 Internet Access

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a. YES, I have an RFP. It is available on the Web at www.altanetworks.com/erate/8/kcusd.htm or via (check one):
 the Contact Person in Item 6 or the contact listed in Item 11.

- b. NO , I do not have an RFP for these services.

If you answered NO, you must list below the Internet Access Services you seek. Specify each **service or function** (e.g., monthly Internet service) and quantity and/or capacity(e.g., for 500 users). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internet Access services. Add additional lines if needed.

10 Internal Connections

Do you have a Request for Proposal (RFP) that specifies the services you are seeking ?

- a. YES, I have an RFP. It is available on the Web at or via (check one):
 the Contact Person in Item 6 or the contact listed in Item 11.

- b. NO , I do not have an RFP for these services.

If you answered NO, you must list below the Internal Connections Services you seek. Specify each **service or function** (e.g., local area network) and quantity and/or capacity(e.g., connecting 10 rooms and 300 computers at 56kbps or better). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internal Connections services. Add additional lines if needed.

11 (Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This need not be the contact person listed in Item 6 nor the signer of this form.

Name:

Title:

Telephone number

() -

Fax number

() -

E-mail Address

12. Check here if there are any restrictions imposed by state or local laws or regulations on how or when providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures, and/or provide Web address where they are posted and a contact name and telephone number for service providers without Internet access.

13. If you intend to enter into a multi-year contract based on this posting or a contract featuring an option for voluntary extensions you may provide that information below. If you have plans to purchase additional services in future years, or expect to seek new contracts for existing services, summarize below (including the likely timeframes).

Multi-year contracts will be considered, including those for existing services.

Block 3: Technology Assessment

14. **Basic telephone service only:** If your application is for basic local and long distance telephone service (wireline or wireless) only, check this box and skip to Item 16.

15. Although the following services and facilities are ineligible for support, they are usually necessary to make effective use of the eligible services requested in this application. Unless you indicated in Item 14 that your application is ONLY for basic telephone service, you must check at least one box in (a) through (e). You may provide details for purchases being sought.

a. Desktop software: Software required has been purchased; and/or is being sought.

b. Electrical systems: adequate electrical capacity is in place or has already been arranged; and/or upgrading for additional electrical capacity is being sought.

c. Computers: a sufficient quantity of computers has been purchased; and/or is being sought.

d. Computer hardware maintenance: adequate arrangements have been made; and/or are being sought.

e. Staff development: all staff have had an appropriate level of training /additional training has already been scheduled; and/or training is being sought.

f. Additional details: Use this space to provide additional details to help providers to identify the services you desire.

Block 4: Recipients of Service

16. Eligible Entities That Will Receive Services:

Check the ONE choice (a,b or c) that best describes this application and the eligible entities that will receive the services described in this application. You will then list in Item 17 the entity/entities that will pay the bills for these services.

a. Individual school or single-site library.

b. Statewide application for (enter 2-letter state code) representing (check all that apply):

- All public schools/districts in the state:
 All non-public schools in the state:
 All libraries in the state:

If your statewide application includes INELIGIBLE entities, check here. If checked, complete Item 18.

c. School district, library system, or consortium application to serve multiple eligible entities:

Number of eligible sites **15**

For these eligible sites, please provide the following

Area Codes
(list each unique area code)

Prefixes associated with each area code
(first 3 digits of phone number)
separate with commas, leave no spaces

559

If your application includes INELIGIBLE entities, check here. If checked, complete Item 18.

17. Billed Entities

List the entity/entities that will be paying the bills directly to the provider for the services requested in this application. These are known as Billed Entities. At least one line of this item must be completed. Attach additional sheets if necessary.

Entity	Entity Number
WASHINGTON ELEMENTARY SCHOOL	107476
SHERIDAN ELEMENTARY SCHOOL	107446
KINGS CANYON CONTINUATION SCH	107345
ALTA ELEMENTARY SCHOOL	107481
JEFFERSON ELEMENTARY SCHOOL	107477
LINCOLN ELEMENTARY SCHOOL	107473
RIVERVIEW ELEMENTARY SCHOOL	107461
KINGS CANYON UNIF SCHOOL DIST	144054
CITRUS MIDDLE SCHOOL	107445
MCCORD ELEMENTARY SCHOOL	107444
ORANGE COVE ELEMENTARY	16022719
THOMAS LAW REED ELEMENTARY	16022718
GREAT WESTERN ELEMENTARY SCH	107483
GENERAL GRANT MIDDLE SCHOOL	107472
NAVELENCIA MIDDLE SCHOOL	107482

18. Ineligible Participating Entities

Does your application also seek bids on services to entities that are not eligible for the Universal Service Program? If so, list those entities here (attach pages if needed):

Ineligible Participating Entity	Area Code	Prefix
--	------------------	---------------

Block 5: Certification and Signature**19. The applicant includes:(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 school (including, but not limited to elementary and secondary schools, colleges and universities).

20. All of the individual schools, libraries, and library consortia receiving services under this application are covered by:

- a. individual technology plans for using the services requested in the application, and/or
- b. higher-level technology plans for using the services requested in the application, or
- c. no technology plan needed; application requests basic local and/or long distance telephone service only.

21. Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):

- a. technology plan(s) has/have been approved by a state or other authorized body.
- b. technology plan(s) will be approved by a state or other authorized body.
- c. no technology plan needed; application requests basic local and long distance telephone service only. .

22. 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.

23. I recognize that support under this support mechanism is conditional upon the school(s) or library(ies) I represent securing access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to use the services purchased effectively.

24. I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

25. Signature of authorized person:

26. Date (mm/dd/yyyy): **02/17/2005**

27. Printed name of authorized person: **IRV ISAAC**

28. Title or position of authorized person: **ASSISTANT SUPERINTENDENT**

29a. Address of authorized person: **4122 East Feemster**
City: **Visalia** State: **CA** Zip: **93292**

29b. Telephone number of authorized person: **(559) 637 - 1210**

29c. Fax number of authorized person: **(209) 6371292**

29d. E-mail address number of authorized person:

Persons willfully making 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 Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

Service provider involvement with preparation or certification of a Form 470 can taint the competitive bidding process and result in the denial of funding requests. For more information, refer to the "Service Provider Role in Assisting Customers" at www.sl.universalservice.org/vendor/manual/chapter5.doc or call the Client Service Bureau at 1-888-203-8100.

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 Description of Services Requested and Certification Form (FCC Form 470) 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 a FCC 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, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

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 470
P.O. Box 7026
Lawrence, Kansas 66044-7026
1-888-203-8100**

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

**SLD-Form 470
c/o Ms. Smith
3833 Greenway Drive
Lawrence, Kansas 66046
1-888-203-8100**

FCC Form 470
May 2003

Kings Canyon Unified School District



Project #KCUSD0506-WAN

District-Wide New WAN Infrastructure

WAN Request for Proposal

District:	Kings Canyon Unified School District
Bid Deadline:	2:00 o'clock p.m. on Tuesday, February 1, 2005
Bid Receipt:	Kings Canyon Unified School District Office 675 W. Manning Ave., Reedley, CA 93654
Primary Contact:	Emerson Tripoli, Fax 559-741-0481, etripoli@altanetworks.com
Secondary Contact:	Scott Buller, Fax 559-637-1292, sbuller@kc-usd.k12.ca.us
Project:	#KCUSD0506-WAN, New WAN Infrastructure
Plans Available:	Kings Canyon Unified School District Office 675 W. Manning Ave., Reedley, CA 93654 559-637-1210 www.altanetworks.com/erate/8/kcUSD.htm

Summary

The Kings Canyon Unified School District is seeking proposals for a new Wireless WAN infrastructure to replace the current Wireless point-to-point bridge configuration. The new WAN will be the primary transport of all data and Internet traffic to and from each school site and the Internet. The new WAN must integrate and be compatible with the existing routing design and IP addressing scheme, and provide a parallel route for the existing landline circuits.

Service providers must complete and return all included documentation for the proposals to be considered responsive and complete.

Responsive and complete proposals will be evaluated on the criteria set forth by the SLD. The most cost effective bid will be selected based on price (30%), prior experience (25%), personnel qualifications (20%), management capability (15%), and environmental objectives (10%). The evaluation criteria are available at the following web page:
<http://www.sl.universalservice.org/whatsnew/reminders-F470.asp#F470R2>

This project is contingent on E-Rate Program Funding as noted on E-Rate Program Application and Form 471 and will be executed or not executed according to E-Rate Program regulations and timelines. At such time, a notice to proceed will be issued by the District. If the contract is not to be executed the District will notice the Contractor accordingly. The Board of Trustees further reserves all rights to use District Forces, or to negotiate contracts, or both, to the extent authorized by the California Education Code and Public Contract Code.

Objective

Since all individual school sites will depend on the District Office for Internet access, each site needs a dedicated minimum connection speed of 20 Megabits (Mbps) per second full-duplex to the aggregation router at the hub sites. The District will select the best proposed design that meets or exceeds the requirements. The requirements for the service is detailed below:

Requirements

- 1) Less than 1% packet loss on 1400 byte packets
- 2) 99.9% uptime
- 3) Sustained minimum transfer rate of 20Mbps full-duplex
- 4) Burst transfer rate of at least 40Mbps full-duplex
- 5) Minimum 100Mbps Full-Duplex Ethernet connection to provider's onsite equipment
- 6) Point-to-point, Point-to-Multipoint, or Ring WAN configuration
- 7) Required speeds must be maintained at distances of up to 6 Miles
- 8) The service must be cost effective compared to traditional T1, Frame Relay and ATM services
- 9) Service provider obtains all necessary licenses and permits in behalf of the District
- 10) Service provider must perform a site-survey for all proposed connected sites, and ensure that the service will not interrupt, or be interrupted by, other devices operating in the same frequency range(s)
- 11) For multi-year contracts, the contract must provide the ability to renegotiate based on changes in E-rate funding, discount level, or cancellation of the E-rate program
- 12) 24 hour, 7 days a week telephone support
- 13) 4-hour response time to service outage
- 14) Equipment must be provided to the District as part of the monthly service charges, or as a separate lease, with the conditions below:
 - a) The on-premise equipment will be provided by the same service provider that provides the eligible telecommunications or Internet access service of which it is a part.
 - b) Responsibility for maintaining the equipment rests with the service provider, not the District.
 - c) Ownership of the equipment will not transfer to the District in the future, and the relevant contract or lease does not include an option to purchase the equipment by the District.
 - d) Up-front, capital charges of the on-premise equipment are less than 67% of total charges (recurring plus non-recurring) in the funding year (2004-2005).
 - e) The equipment will not be used by the District for any purpose other than receipt of the eligible telecommunications or Internet access service of which it is a part.
 - f) The Local Area Network of each school site in the District is functional without dependence on the equipment.
 - g) There is no contractual, technical, or other limitation that would prevent the service provider from using its network equipment in part for other customers.

Scope of Work

1. An existing 250' tower and room at the base of the tower at the District Office location in Reedley is available for antennas, cabling, and equipment
2. Vendor must submit a complete proposed design
3. Install, configure, and maintain equipment and service to meet service requirements
4. Proposed Connected Sites
 - a. Alta Elementary
 - i. Street Address: 21771 East Parlier Ave, Reedley, CA 93654

- ii. Latitude, Longitude, Elevation: N36.36.6694, W119.23.9383, 366.74'
- b. KCHS
 - i. Street Address: 10026 South Crawford, Dinuba, CA 93618
 - ii. Latitude, Longitude, Elevation: N36.35.3397, W119.22.6441, 369.94'
- c. Citrus Middle School
 - i. Street Address: 1400 Anchor, Orange Cove, CA 93646
 - ii. Latitude, Longitude, Elevation: N36.36.9977, W119.19.3611, 398.35'
- d. Sheridan Elementary
 - i. Street Address: 1001 9th Street, Orange Cove, CA 93646
 - ii. Latitude, Longitude, Elevation: N36.37.0557, W119.19.0270, 412.64'
- e. McCord Elementary
 - i. Street Address: 333 Center Street, Orange Cove, CA 93646
 - ii. Latitude, Longitude, Elevation: N36.37.6967, W119.18.8371, 421.54'
- f. AL Conner Elementary
 - i. Street Address: 222 4th Street, Orange Cove, CA 93646
 - ii. Latitude, Longitude, Elevation: N36.37.7579, W119.18.5572, 434.14'
- g. Riverview Elementary
 - i. Street Address: 8662 South Lac Jac, Parlier, CA 93648
 - ii. Latitude, Longitude, Elevation: N36.53.57, W119.29.0235, 345.52'
- h. Washington Elementary
 - i. Street Address: 1250 K Street, Reedley, CA 93654
 - ii. Latitude, Longitude, Elevation: N36.35.113, W119.27.1557, 360.45'
- i. Jefferson Elementary
 - i. Street Address: 1037 East Duff Avenue, Reedley, CA 93654
 - ii. Latitude, Longitude, Elevation: N36.35.5892, W119.26.2701, 350.44'
- j. Grant Middle
 - i. Street Address: 360 North East Avenue, Reedley, CA 93654
 - ii. Latitude, Longitude, Elevation: N36.35.9477, W119.26.6077, 348.91'
- k. Lincoln Elementary
 - i. Street Address: 374 East North Avenue, Reedley, CA 93654
 - ii. Latitude, Longitude, Elevation: N36.36.0369, W119.26.7405, 352.18'
- l. TL Reed School
 - i. Street Address: 1400 North Frankwood Avenue, Reedley, CA 93654
 - ii. Latitude, Longitude, Elevation: N36.36.5257, W119.26.9161, 344.49'
- m. Navelencia Middle School
 - i. Street Address: 22620 East Wahtoke Avenue, Reedley, CA 93654
 - ii. Latitude, Longitude, Elevation: N36.41.0801, W119.23.0369, 428.85'
- n. Great Western Elementary
 - i. Street Address: 5051 South Frankwood Avenue, Reedley, CA 93654
 - ii. Latitude, Longitude, Elevation: N36.39.7333, W119.27.0324, 379.05'
- o. District Office
 - i. Street Address: 675 Manning Avenue, Reedley, CA 93654
 - ii. Latitude, Longitude, Elevation: N36.36.1857, W119.27.3590, 350.38'

Vendor Questionnaire

Legal Name of Company: _____

Type: __Individual __Sole Proprietor __LLC/LLP __Corporation

Main Address: _____

Phone #: _____ Fax #: _____

Tax ID: _____ SPIN: _____

Contractor Lic. #: _____ Years in Business: _____

Principal Owner: _____

Address: _____

Certifications: _____

Project References:

Name: _____ Contact: _____

Phone: _____ E-mail: _____

Address: _____

Short Description of Project: _____

Name: _____ Contact: _____

Phone: _____ E-mail: _____

Address: _____

Short Description of Project: _____

Name: _____ Contact: _____

Phone: _____ E-mail: _____

Address: _____

Short Description of Project: _____
