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Received & Inspected

AUG 15 2011

FCC Mail Room

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August 8, 2011

## Request for Review TO increase the discount level for BEN 16049054

CC Docket No. 02-6

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

To whom it may concern;

Appellant Name: Richard Senturia, consultant for applicant.  
Applicant: St. Rafael the Archangel, 2075 S 32<sup>nd</sup> St(N), Milwaukee, WI 53215  
Applicant BEN #: 16049054  
Applicant Form 471 # 778996

When we filed the Form 471 for St. Rafael the Archangel BEN 16049054 we entered another schools information regarding the "total number of students" and the "number of students eligible".

I have attached page 3 of the Form 471 and an NSLP claim form from St. Rafael the Archangel. If you need additional information I can forward it to you.

We would like to have the 50%, which the school was approved for, increased to 90%, which the school is eligible for.

Respectfully,

Richard Senturia, Consultant  
231 S. Bemiston, 8<sup>th</sup> Floor  
Clayton, Mo 63105  
314-854-1328 office  
314-854-1329 fax  
rsenturia@erateprogram.com

Ms. [Name] [Address]  
442 15<sup>th</sup> Street

No. of Copies rec'd 0  
List A B C D E

Entity Number: 16049054										Applicant's Form Identifier: StRaphaelLWI-11				
Contact Person: Richard Senturia										Contact Phone Number:				
Block 4: Discount Calculation Worksheet										Worksheet - 1287858 Page 1 of 1				
<p>The Block 4 worksheet is used to calculate your discount for services. You will complete one or more worksheets depending on the type of application you are filing. If you file more than one worksheet, please number the completed worksheets to assure that they are all processed correctly. Please refer to the instructions for information specific to the Type of Application you indicated in Block 1, Item 5.</p> <p><input type="checkbox"/> Check here if this worksheet contains all eligible entities in the school district or library system.</p>														
9a List entities and calculate discount(s):										(For Administrator's Use)				
School District or Library System Name:										School District or Library System Entity Number:				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Name of Eligible Entity	Entity Number AND NCES Code (for Schools) or FSCS Code (for Libraries)	Urban or Rural U or R	Total Number of Students	Number of Students Eligible for NSLP	Percent of Students Eligible for NSLP (Col. 5 / Col. 4)	Disc. from Disc. Matrix	New Construction	Admin Entity or NIF	Alt. Disc. Mech.	Weighted Product for Calculating Shared Discount (Col. 4 x Col. 7)	Insert appropriate codes(s): P= pre-K, H = Head Start, A = Adult Education, J = Juvenile Justice Center = ESA, D = Dormitory	Entity Number of School District in which Library Outlet/Branch is Located	Discount of Member Entity	Shared Discount
ALL ENTITIES			SCHOOLS AND LIBRARIES							Schools with shared services	Schools	Library Outlet/Branch	Consortia	
ST. RAFAEL THE ARCHANGEL	16049054 01 50748 2	U	90	20	22.222%	50	N	N	N	4500				
9b Shared Services														
SCHOOL DISTRICTS: (Including groups of schools within school districts.) Calculate the totals of Columns 4 and 11. Divide the total of Column 11 by the total of Column 4. Enter the result in Column 15.			90							4500				50%
LIBRARY SYSTEMS: Calculate the total of Column 7. Divide this total by the number of outlets/branches. Enter the result in Column 15.														
CONSORTIA: Calculate the total of Column 14. Divide this total by the number of member entities. Enter the result in Column 15.														

2010-2011 SCHOOL YEAR STATISTICS

As of 9/17/10 - Third Friday Count - Total Enrollment: 369 Students and 236 families

Breakdown Per Grade:

	Boys	Girls	Total
K4	24	20	44
K5	23	29	52
1	31	16	47
2	24	20	44
3	26	22	48
4	20	26	46
5	7	18	25
6	11	8	19
7	12	12	24
8	10	10	20
Total:	188	181	369

Ethnic Breakdown:

Hispanic: 95%	American Indian/ Native Alaskan : 0%
White: 2%	Black: 0%
Multi Racial : 3%	Native Hawaiian/Pacific Islander: 0%

Religious Breakdown

Catholic: 95%	Non Catholic: 5%
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97% CHOICE Students	3% Non Choice Students
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As of 10/29/10 Free and Reduced Lunch Eligibility - Total Number of Students 375

Over All Percentage: 96% Free/Reduced

Free: 87%	Reduced: 9 %	Paid: 4%
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Grade	Free	Reduced	Full Price	Class Total
K4A	20	2	0	22
K4B	17	5	1	23
K5A	23	2	1	26
K5B	24	2	0	26
1A	22	2	0	24
1B	20	2	2	24
2A	21	2	0	23
2B	17	3	2	22
3A	22	1	2	25
3B	22	1	2	25
4A	20	3	0	23
4B	20	3	0	23
5	21	2	1	24
6	19	0	2	21
7	20	3	1	24
8	17	3	0	20
TOTAL	325	36	14	375

2009-2010 School Year Statistics

As of 9/18/09 - Third Friday Count - Total Enrollment: 334 students and 212 families  
Breakdown Per Grade:

	Boys	Girls	Total
K4	22	22	44
K5	15	29	44
1	19	17	36
2	25	22	47
3	22	24	46
4	9	17	26
5	12	6	18
6	12	13	25
7	12	13	25
8	11	12	23
Total:	159	175	334

Ethnic Breakdown:

Hispanic: 95%	American Indian/ Native Alaskan : 0%
White: 2%	Black: 0%
Multi Racial : 3%	Native Hawaiian/Pacific Islander: 0%

Religious Breakdown

Catholic: 92%	Non Catholic: 8%
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As of 10/31/09 Free and Reduced Lunch Eligibility - Total Number of Students  
Over All Percentage: 96% Free/Reduced

Free: 85%	Reduced: 11 %	Paid: 3%
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Grade	Free	Reduced	Full Price	Class Total
K4A	19	2	1	22
K4B	20	2	0	22
K5A	21	1	0	22
K5B	19	3	0	22
1A	17	2	0	19
1B	17	1	1	19
2A	21	1	2	24
2B	20	4	0	24
3A	18	2	3	23
3B	18	4	1	23
4	22	2	1	25
5	17	1	0	18
6	18	4	2	24
7	19	5	0	24
8	19	4	0	23
TOTAL	285	38	11	334



**Administrator's Decision on Appeal – Funding Year 2011-2012**

Received & Inspected

July 20, 2011

AUG 15 2011

Richard Senturia  
eRate Program, LLC  
231 S. Bemiston, 8th Fl.  
Clayton, MO 63105

FCC Mail Room

Re: Applicant Name: ST. RAFAEL THE ARCHANGEL  
Billed Entity Number: 16049054  
Form 471 Application Number: 778996  
Funding Request Number(s): 2110115, 2110117, 2110120, 2110125, 2110132  
Your Correspondence Dated: July 06, 2011

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2011 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2110115, 2110117, 2110120, 2110125, 2110132

Decision on Appeal: **Denied**

Explanation:

- A Form 471 Receipt Acknowledgment Letter (RAL) was sent to St. Rafael the Archangel on February 24, 2011. The RAL listed allowable clerical and ministerial error corrections to the Form 471 and indicated that the deadline for submitting such corrections was March 16, 2011. The record indicates no such submittal was made. The rules of this support mechanism do not allow for an increase of a funding request subsequent to the Form 471 being committed for funding unless there was an error on the part of USAC. On appeal, you have failed to provide any evidence that USAC erred in its initial determination.
- The FCC's Bishop Perry Order directed USAC "to provide all E-rate applicants with an opportunity to correct ministerial and clerical errors on their FCC Form 470 or FCC Form 471, and an additional opportunity to file the required

certifications” without posting new FCC Forms 470 and 471. *See* Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, et al., Schools and Libraries Universal Service Mechanism, File Nos. SLD-487170, et al., CC Docket No. 02-6, *Order*, 21 FCC Rcd 5316-5317, FCC 06-54 para. 23 (May 19, 2006) (*Bishop Perry Order*). As a result, USAC sends an applicant a Receipt Acknowledgement Letter (RAL) when the FCC Form 471 has been successfully data entered and provides the applicant with an opportunity to make allowable corrections to its FCC Form 471. USAC has published a list of ministerial and clerical errors that can be corrected on pending applications without violating the program rules and has advised applicants to review this list before submitting corrections. *See* SLD Section of USAC web site, Reference Area, “Bishop Perry Order, List of Ministerial and Clerical Errors” at [www.usac.org/sl](http://www.usac.org/sl).

- Your appeal requests additional funds that were not included in the FCC Form 471 that you are appealing. FCC rules require that funding requests must be submitted via an FCC Form 471. *See* 47 C.F.R. sec. 54.504(a). New funding requests cannot be submitted through the appeals process. Considerations for funding requests depend on the date the FCC Form 471 is received and the amount of funds available if it is received after the close of the filing window. *See* 47 C.F.R. sec. 54.507(g). Consequently, USAC denies your appeal insofar as it requests funding that was not included in the FCC Form 471.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company