

August 19, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: CC Docket No. 02-6
Request for Review

Dear Secretary Dortch:

We are requesting a review of USAC's Administrator's Decision on Appeal – Funding Year 2010-2011, dated August 15, 2011. A copy of that letter is attached as Exhibit 1. Also attached is the entire appeal packet sent to USAC for consideration, including the appeal letter and exhibits A – M.

We strongly argue that USAC erred in its decision. Their decision to deny was contrary to verbal advice we were given on June 15, 2010 which we documented contemporaneously and upon which we relied and promptly acted. We are referring to point 8 in the July 27, 2011 appeal letter to USAC which is excerpted here:

8) Shannon Groothuis' June 15, 2010 notes based on a telephone conversation with USAC indicates we were told by USAC that since the Form 471 number 726265 was not assigned to a reviewer yet, we should go ahead and complete the additional Block 5's for FRN's and email the Item 21 attachments separately. USAC verbal instructions were so detailed as to tell us to label them 1 of 3, 2 of 3 and 3 of 3.

As indicated by the denial of our appeal, USAC erred in telling Shannon Groothuis that since the Form 471 was not assigned to a reviewer that corrections would still be accepted. USAC indicates in the denial letter that "the deadline for submitting such corrections was March 4, 2010." This stance directly contradicts USAC's position on June 15, 2010. Thus in good faith the district filed the corrections on June 16, 2010. USAC should honor the advice they give. We respectfully request that you approve our funding requests for Enventis Telecom, Inc., US Link, Inc DBA TDS Metrocom and Charter Fiberlink CC VIII, LLC.

The person who can most readily discuss this appeal is:

Mary Harris, District Accountant
Willmar Public Schools
611 5th Street SW
Willmar, MN 56201
Phone: 320-231-8527
Fax: 320-231-8504
Email: harrism@willmar.k12.mn.us

Sincerely,



Mary Harris
District Accountant



The Willmar Public Schools

Received & Inspected

AUG 26 2011

FCC Mail Room

Independent School District 347
611 Fifth Street SW, Willmar, MN 56201
Telephone: 320-231-8500
FAX: 320-231-8504
www.willmar.k12.mn.us



Pam Harrington
Director of Business and Finance

No. of Copies rec'd 0
List ABCDE



Administrator's Decision on Appeal – Funding Year 2010-2011

AUG 26 2011
FCC Mail Room

August 15, 2011

Mary Harris
Willmar Indep School Dist 347
611 5th Street SW
Willmar, MN 56201-3218

Re: Applicant Name: WILLMAR INDEP SCHOOL DIST 347
Billed Entity Number: 133854
Form 471 Application Number: 726265
Funding Request Number(s): 1 Unassigned
Your Correspondence Dated: July 27, 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 2010 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): 1 Unassigned
Decision on Appeal: **Denied**
Explanation:

- A Form 471 Receipt Acknowledgment Letter (RAL) was sent to Willmar Independent School District 347 on February 12, 2010. The RAL listed allowable clerical and ministerial error corrections to the Form 471 and indicated that the deadline for submitting such corrections was March 4, 2010. On June 17, 2010, the Willmar Independent School District 347 requested three additional Block 5 requests for FRNs. These requests could not be processed because adding FRNs to a Form 471 after the form has been submitted is not an allowable change. You failed to provide evidence on appeal that the USAC erred in its original decision and consequently, your appeal is denied.
- 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.

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

July 27, 2011



The Willmar Public Schools

Letter of Appeal
Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Received & Inspected

AUG 20 2011

FCC Mail Room

Independent School District 347

611 Fifth Street SW, Willmar, MN 56201

Telephone: 320-231-8500

FAX: 320-231-8504

www.willmar.k12.mn.us

Dear Appeals Processor:

This letter is an appeal on FY10 Form 471 Application Number: 726265. The person who can most readily discuss this appeal is:

Mary Harris, District Accountant
Willmar Public Schools
611 5th Street SW
Willmar, MN 56201
Phone: 320-231-8527
Fax: 320-231-8504
Email: harrism@willmar.k12.mn.us

The detailed information identifying the letter and decision that we are appealing:

Appellant/Applicant Name: Willmar Indep. School Dist 347
Applicant BEN: 133854
Service Provider Names: Enventis Telecom, Inc., SPIN 143003845
US Link, Inc DBA TDS Metrocom, SPIN 143001158
Charter Fiberlink CC VIII, LLC, SPIN 143033155
Verizon Wireless, SPIN 143000677
Shoutpoint, Inc, SPIN 143032646

Form 471 Application Number: 726265

“Funding Commitment Decision Letter for Funding Year 2010” dated June 14, 2011

The decision we are appealing: RAL changes requested were not implemented because the RAL request was received late. Specifically, those RAL changes were adding Block 5 forms for 1) Enventis Telecom, Inc., 2) US Link, Inc DBA TDS Metrocom and 3) Charter Fiberlink CC VIII, LLC.

We are asking you consider the following information and implement the RAL changes requested:

- 1) Form 470 Application number 914110000809048 was finally and correctly posted on January 11, 2010. We say finally and correctly because two prior 470's (#30997000807094 and #937260000806153) were cancelled for errors. We attribute the errors to the inexperience of our staff then responsible for E-rate filing and to the complexity of E-rate filing.
- 2) USAC issued Form 470 number 914110000809048 RNL dated January 21, 2010(See Exhibit A)
- 3) Form 471 number 726265 was filed on a timely basis on February 8, 2010 but Block 5 forms for 1) Enventis Telecom, Inc., 2) US Link, Inc DBA TDS Metrocom and 3) Charter Fiberlink CC VIII, LLC., were missing because our staff did not understand that Block 5 on Form 471 must be completed annually in order to qualify for discounts on multi-year vendor contracts from FY08 Form 470 # 349230000649508

and FY08 Form 470 # 24000000649544. Another contributing factor was that “services that are covered by a signed, written contract executed pursuant to posting of a Form 470 in a previous funding year...do NOT require filing of a new Form 470” so we were not required to take any action, which then put these vendors in the background and we failed to refocus on them when preparing the Form 471.

- 4) USAC issued Form 471 number 726265 RAL dated February 12, 2010 (see Exhibit B).
- 5) Our staff reviewed the Form 471 number 726265 RAL Funding Requests Report, verifying the information on the two Funding Request Numbers (FRN 2027012 and FRN 2027231). Again, inexperience played a role. Staff did not understand that if a vendor was not included in the Form 471 number 726265 Funding Requests Report with an FRN, then discounts would not be available in FY10. So, the 3/4/2010 deadline for changes passed.
- 6) There followed a waiting period, then beginning in May 2010, staff responded to various questions from Jacqueline Ortegon, USAC Associate Manager, PIA, SLD, to clarify information in our application.
- 7) On June 14, 2010, Shannon Groothuis, District Account, Willmar ISD 347 filled out Form 471 #726265 RAL Funding Requests Report Correction form noting addition of 3 Block 5 forms for FRN's (see Exhibit C). All three RAL changes were for service providers (Enventis, US Link DBA TDS Metrocom and Charter Fiberlink) with whom we had multi-year contracts, 470 Applications approved in FY08, and 471 funding commitments in FY08 and/or FY09.
- 8) Shannon Groothuis' June 15, 2010 notes based on a telephone conversation with USAC indicates we were told by USAC that since the Form 471 number 726265 was not assigned to a reviewer yet, we should go ahead and complete the additional Block 5's for FRN's and email the Item 21 attachments separately. USAC verbal instructions were so detailed as to tell us to label them 1 of 3, 2 of 3 and 3 of 3.
- 9) On June 16, 2010 Case number 22-077952 was opened. A copy of the initial contact email is attached at Exhibit D.
- 10) On June 17, 2010 three additional Block 5 Discount Funding Requests were submitted by email for FRN's. Copies of those are at Exhibits E, F, G and H. Please note on Exhibit H: the SPIN number in FY08 was 143005817.
- 11) Three Item 21 attachments related to the above noted Block 5 items were also submitted by email on June 17, 2010. Copies of those are at I, J, K and L. PLEASE NOTE: The cover email and all 3 Item 21 documents show an incorrect 471 Application number of 726565. The correct number is 726265.
- 12) Between June 29, 2010 and April 26, 2011 Shannon Groothuis called USAC more than a dozen times, asking about the status of the RAL changes requested, case #22-077952, and the Form 471. Shannon kept a log of contemporaneous notes of those calls and those notes indicate that she was repeatedly told that it was still in review and USAC was far behind schedule.
- 13) USAC issued Form 471 #726265 FCDL on June 14, 2011, almost one year from the filing of the Block 5 corrections. (Exhibit M)
- 14) Since the RAL changes were not included, Willmar ISD #347 is filing this appeal per instructions received in a telephone conversation with USAC on July 8, 2010, regarding case 22-077952

We can say with certainty that we made a good faith effort to understand the process and timelines, but the learning curve on this is so steep that our compliance was not perfect. However, it does seem like the advice we got from USAC on June 15, 2010, to submit the Block 5 and Item 21 attachments implied there was appropriate time flexibility for us since USAC was behind schedule on the applications.

We also want you to know that we have hired an E-rate coordinator consultant to assure that our future E-rate applications and forms submissions meet processing standards and submission deadlines.

We respectfully request that you approve all three additional Block 5 Discount Funding Requests.

Sincerely,



Mary Harris
District Accountant



Pam Harrington
Director of Business and Finance



The Willmar Public Schools

Independent School District 347
611 Fifth Street SW, Willmar, MN 56201
Telephone: 320-231-8500
FAX: 320-231-8504
www.willmar.k12.mn.us

Received & Inspected

AUG 20 2011

FCC Mail Room

June 17, 2011

Michael Giudice

MGUIDICE@sl.universalservice.org

Dear Michael:

This letter is to inform you that Shannon Groothuis is no longer with Willmar Public Schools and should be deactivated.

Mary Harris is taking Shannon's place and should have the same rights and access as Shannon. Below is Mary's information:

- Name: Mary Harris
- Title: District Accountant
- Address: Willmar Public Schools, 611 5th Street SW, Willmar, MN 56201
- Phone: 320-231-8527
- Fax: 320-231-5480
- Email: *harrism@willmar.k12.mn.us*

Please let me know if you need any additional information.

Sincerely,

Pam Harrington

Director of Business and Finance

harringtonp@willmar.k12.mn.us



*Final -
correct*

Schools and Libraries Division

FORM 470 RECEIPT NOTIFICATION LETTER
(Funding Year 2010: 07/01/2010-06/30/2011)

Received & Inspected

January 21, 2010

AUG 20 2011

FCC Mail Room

Shannon Groothuis
WILLMAR INDEP SCHOOL DIST 347
611 5TH ST SW
WILLMAR, MN 56201

Re: Form 470 Application Number: 914110000809048
Entity Number: 133854
Applicant's Form Identifier: 3 Media
Date Form 470 Posted: 01/11/2010
Allowable Contract Date: 02/08/2010

Corrections Due by: 02/10/2010

This is your notification that the above Form 470, "Description of Services Requested and Certification Form" was successfully posted to the USAC website. This posting begins the required 28-day competitive bidding process.

Attached to this RNL is a Report summarizing the information you provided to USAC for the above Form 470, application number 914110000809048. Also included are advisories to assist you in appropriate use of the Form 470 to establish funding requests on your Form 471.

It is important that you review this Report now to make sure the products and services you require have been correctly posted and, if necessary, take any appropriate corrective action as soon as possible. You are allowed to correct certain errors on your form but not others. The Report indicates if a correction to a field is allowed.

- If a correction to a field is allowed, follow the instructions below to submit your correction to USAC.
- If corrections are not allowed, you must post a new Form 470.

Please note that this letter provides the notice required by the Bishop Perry Order (FCC 06-54, released 5/19/2006), permitting you to review and make allowable corrections to your Form 470 by 02/10/2010.

To make an allowable correction, please do the following:

- Verify that the allowed correction can be made through the RNL correction process. Any non-allowable corrections submitted through the RNL correction process will not be made.
- Make a copy of your report and indicate on the copy any allowable corrections in the spaces indicated.
- Sign the copy and include your name, title, contact information, and date.
- Submit the copy using the guidance posted on the Form 470 RNL page on our website.
- Corrections must be submitted no later than 02/10/2010.
- Retain a copy of the RNL and any submitted corrections.
- To determine what corrections are allowable and why review of this Report is important to you, see the "List of correctable ministerial and clerical errors" posted in the Reference Area of our website.

*Exhibit A
p. 1 of 4*

GENERAL REMINDERS

- Use the Form 470 Application Number shown above in any Form 471, Block 5 Funding Request that cites this Form 470. Share this number with those schools and/or libraries who may wish to cite this Form 470 in their Form(s) 471.
- Follow all applicable state and local procurement laws and be prepared to demonstrate compliance with these laws.
- Include appropriate contingencies in contracts for any or all of the requested services in the event of modification or denial of funding.
- See "Guide to USAC Letter Reports" posted in Reference Area of our website.
- Watch our website for information about the Form 471 filing window.
- You can view your entire Form 470 by clicking on the "Search Posted" button in the Apply Online area of the website.
- Use the print feature on your browser to print any portion of your Form 470 or the entire application as posted.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

**Form 470 914110000809048 RNL Report
Funding Year 2010**

THIS REPORT DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS.
USE THIS REPORT TO LIST OR INDICATE CORRECTIONS YOU WISH TO MAKE TO YOUR FORM 470.

Allowable Contract Date: 02/08/2010

This is the earliest date to execute contracts for contracted services, select your service provider(s) (including tariff/month-to-month service providers), and sign and submit your FCC Form 471, "Services Ordered and Certification Form" based on this Form 470. Any funding request with earlier dates for these actions that cite this Form 470 as the establishing Form 470 will result in denial.

Corrections Below Submitted by:

Signature: _____ Date: _____

Printed Name: _____

Title: _____

Email, Fax Number or Phone Number: _____

Item #	Data Entered on FCC Form 470	Make Corrections Here
--------	------------------------------	-----------------------

1.	Name of applicant WILLMAR INDEP SCHOOL DIST 347	
----	--	--

3.	Entity Number	133854	
6a.	Contact Person's Name	Shannon Groothuis	
6c.	Contact Telephone	320-231-8527	
6d.	Contact Fax	320-231-8504	
6e.	Contact Email	groothuiss@willmar.k12.mn.us	

7a.	Tariffed or Month-to-Month	No	Corrections not allowed
7b.	New Written Contract	Yes	Corrections not allowed
	Multi-year contract	Yes	Corrections not allowed
	Voluntary extensions	No	Corrections not allowed
7c.	Contract signed on or before 7/10/1997	No	Corrections not allowed

- Although corrections to Items 7a and 7b are not allowed, your choice of services on the Form 471 is not limited by the choices you indicate for these items.
- You must post a new Form 470 each funding year for tariff or month-to-month services.
- Item 7c should be checked ONLY if your contract was signed on or before 7/10/1997.

8.	Telecommunications Service	Posted - No RFP	Corrections not allowed
9.	Internet Access	Posted - No RFP	Corrections not allowed
10.	Internal Connections Other than Basic Maintenance	Not Posted	Corrections not allowed
11.	Basic Maintenance of Internal Connections	Not Posted	Corrections not allowed

- You cannot seek discounts for products or services in a Category of Service on the Form 471 if those services in those categories were not indicated on a Form 470. You must post a new Form 470 and wait the required 28 days to correct this.
- If you indicated in this Form 470 that an RFP is available for a service but one is not, your funding request will be denied. You must post a new Form 470 and wait the required 28 days to correct this.

Form 470 914110000809048 RNL Report
Funding Year 2010

Item #	Data Entered on FCC Form 470	Make Corrections Here
12.	Technical Contact Name Telephone Number Fax Number Email Address	Steve Giroux 320-231-8544 320-231-8504 girouxs@willmar.k12.mn.us

16c. Number of Entities in School District, 1
Library or Consortium
- Corrections to the number of eligible entities is allowable as long as the new information is not a significant departure from the scope of the original request and is due to clerical error.

17. Billed Entities
133854 - WILLMAR INDEP SCHOOL DIST 347
- Billed Entities other than the entity listed in Item 3 of this form must be listed in Item 17 except as indicated on the form.



FORM 471 RECEIPT ACKNOWLEDGMENT LETTER
(Funding Year 2010: 07/01/2010 - 06/30/2011)

February 12, 2010

Shannon Groothuis
WILLMAR INDEP SCHOOL DIST 347
611 5th St SW
Willmar, MN 56201

Re: Form 471 Application Number: 726265
Funding Year 2010: 07/01/2010 - 06/30/2011
Applicant's Form Identifier: 3 Media
Billed Entity Number: 133854

*6/2010
sent in RAL for
Additional 3 block S's
Charter
Events
TDS*

CORRECTIONS DUE BY: 03/04/2010

Your certified FCC Form 471, "Services Ordered and Certification Form," requested \$23,988.60 in total Schools and Libraries Program (Program) pre-discount costs for services for Funding Year 2010. A copy of this information has been provided to the service provider(s) whose Service Provider Identification Number(s) (SPIN) is featured on this Form 471.

USAC provides a separate Receipt Acknowledgment Letter (RAL) with a RAL Funding Requests Report (Report) for each application certified within the application window. The Report summarizes the information provided to USAC. A space is provided for you to make allowable corrections to any clerical errors or errors that you realize may result in reduction or denial of funding. USAC will perform a complete analysis before funds are committed. If additional errors are found during our review we will attempt to contact you for clarification before making a decision that results in denials or reductions.

Review this Report to verify that the information accurately reflects your request. If the information is accurate, file this letter with your records.

DO NOT SEND CORRECTION TO THE CLIENT SERVICE BUREAU. To make corrections, please do the following by 03/04/2010:

- If contact information provided above is incorrect, note any correction above and submit a signed copy of this page as a correction.
- Indicate any corrections you wish to make in the Report in the spaces indicated.
- Sign where indicated, and provide your name, title, contact information and date.
- Submit a copy of your marked-up RAL to the email address, fax number or mailing address posted in the "Changes and Corrections" area of our website.
- Retain a copy of the RAL and any submitted corrections.

REMINDERS REGARDING THE RAL

- This letter does NOT contain any decisions concerning your requests for discounts.
- Funding requests that did not pass Minimum Processing Standards are not included in the Report following this letter.
- See "Guide to USAC Letter Reports" posted in the Reference Area of our website for a description of each individual field in the following Report.
- If you would like to view a Form 471 application, click the "Display" button in the Apply Online Area of the website. Enter the Application Number where indicated. Use the print feature on your browser to print any portion of your Form 471 or the entire application as displayed for your records or to include with any

*Exhibit B
p1 of 6*

corrections submitted.

GENERAL REMINDERS

- Submit your Item 21 attachments if you haven't already done so. See "Item 21 Attachments For Form 471" posted on our website.
- Retain documentation showing that you have complied with all statutes and Federal Communications Commission rules. See "Document Retention Requirements" posted in the Reference Area of our website.
- Retain all required documents for a period of at least five years after the last day of service delivered.
- Budgeted funds to provide necessary resources must NOT be provided directly or indirectly by a service provider. See Form 471, Block 6, Item 25 Certification and instructions.
- Respond promptly to any USAC requests for clarification or additional information.
- A USAC-certified Technology Plan Approver MUST approve your technology plan before discounted services begin. See "Develop a Technology Plan" on our website.
- Work with your service provider(s) to ensure timely delivery of discounted services.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100. DO NOT SEND CORRECTION TO THE CLIENT SERVICE BUREAU.

Schools and Libraries Division
Universal Service Administrative Company

Form 471 726265 RAL Funding Requests Report

THIS REPORT DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS.
USE THIS REPORT TO LIST OR INDICATE CORRECTIONS YOU WISH TO MAKE TO YOUR FORM 471.

Corrections Submitted by:

Signature: _____ Date: _____

Printed Name: _____

Title: _____

Email, Fax Number or Phone Number: _____

Item	Data Entered on FCC Form 471	Make Corrections Here
------	------------------------------	-----------------------

1a. Name of Billed Entity	WILLMAR INDEP SCHOOL DIST 347	
3. Billed Entity Number	133854	
6. Contact Person's Name	Shannon Groothuis	
6. Preferred mode of contact	Email	
6c. Contact Phone	320-231-8527	6d. Contact Fax 320-231-8504
6e. Email	groothuiss@willmar.k12.mn.us	
6f. Holiday/vacation/summer contact information	- if provided	

The Billed Entity name, address, phone and fax numbers cannot be changed via the RAL correction process. See the "Changes and Corrections" area of our website for guidance.

Block 4

While the RAL does not contain Block 4 Worksheet Information, you are allowed to make the following modifications:

- Delete entities from Block 4
- Add entities to Block 4
- Correct any Block 4 information for an entity (RAL corrections are not required for student counts that don't affect your Program discount.)

To delete an entity;

Provide a separate page stating that you wish to delete the entity and provide:

Application #
Worksheet #
Entity #
Entity Name

To add an entity;

Include an additional page from a blank Form 471 Block 4 Worksheet, available on the Required Forms page on our website. All fields must be completed. Indicate the worksheet number to which this entity should be added or indicate if a new worksheet should be created.

To correct an entity;

Print the Block 4 worksheet for your Form 471 application using the 'Display' button in the Apply Online area of our website and make corrections to the appropriate field.

Block 5

USAC may require additional information before making requested corrections to

certain fields in Block 5 such as Category of Service, Contract Award or Expiration Dates, etc.

Form 471 726265 RAL Funding Requests Report

FRN: 2027012

IF YOU WISH TO CANCEL THIS FRN, PLEASE CHECK HERE

Item #	Data Entered on FCC Form 471	Make Corrections Here
11. Category of Service	Telecommunications Service	
12. 470 App#	914110000809048	
13. SPIN	143032646	
14. Service Provider Name	SHOUTPOINT, INC.	
15b. Contract Number	101521	
16a. Billing Account Number	3202318500	
16b. Multiple Billing Account Numbers	N	
18. Contract Award Date	02/08/2010	
19. Service Start Date	07/01/2010	
20a. Service End Date		
20b. Contract Expiration Date	06/30/2011	
22. Block 4 Entity or Worksheet No	1180549	
23a. Monthly Charges	\$525.00	
23b. Ineligible Monthly Amt	\$0.00	
23c. Eligible Monthly Amt	\$525.00	
23d. Number of months of service	12	
23e. Annual Pre-discount Amount for eligible recurring charges	\$6,300.00	Calculated - Not Input
23f. Annual Non-Recurring (One-Time) Charges	\$0.00	
23g. Ineligible Non-Recurring Amount	\$0.00	
23h. Annual Pre-discount Amount for eligible Non-Recurring charges	\$0.00	Calculated - Not Input
23i. Total Pre-discount Amt	\$6,300.00	Calculated - Not Input
23j. Discount from Block 4	75	See Block 4 Above
23k. Funding Commitment Request	\$4,725.00	Calculated - Not Input
25f. Service provider assistance with funding	No	

Exhibit B
p 5 of 6

Form 471 726265 RAL Funding Requests Report

ERN: 2027231

IF YOU WISH TO CANCEL THIS FRN, PLEASE CHECK HERE _____

Item #	Data Entered on FCC Form 471	Make Corrections Here
11. Category of Service	Telecommunications Service	
12. 470 App#	914110000809048	
13. SPIN	143000677	
14. Service Provider Name	Verizon Wireless	
15b. Contract Number	GS-35F-0119P	
16a. Billing Account Number	3202318500	
16b. Multiple Billing Account Numbers	N	
18. Contract Award Date	01/15/2010	
19. Service Start Date	07/01/2010	
20a. Service End Date		
20b. Contract Expiration Date	06/30/2011	
22. Block 4 Entity or Worksheet No	1180549	
23a. Monthly Charges	\$1,474.05	
23b. Ineligible Monthly Amt	\$0.00	
23c. Eligible Monthly Amt	\$1,474.05	
23d. Number of months of service	12	
23e. Annual Pre-discount Amount for eligible recurring charges	\$17,688.60	Calculated - Not Input
23f. Annual Non-Recurring (One-Time) Charges	\$0.00	
23g. Ineligible Non-Recurring Amount	\$0.00	
23h. Annual Pre-discount Amount for eligible Non-Recurring charges	\$0.00	Calculated - Not Input
23i. Total Pre-discount Amt	\$17,688.60	Calculated - Not Input
23j. Discount from Block 4	75	See Block 4 Above
23k. Funding Commitment Request	\$13,266.45	Calculated - Not Input
25f. Service provider assistance with funding	No	

Exhibit B
p 6 of 6

Form 471 726265 RAL Funding Requests Report

THIS REPORT DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS.
USE THIS REPORT TO LIST OR INDICATE CORRECTIONS YOU WISH TO MAKE TO YOUR FORM 471.

Corrections Submitted by:

Signature: Shannon Groothuis Date: 6/14 - 2010

Printed Name: Shannon Groothuis

Title: District Accountant

Email, Fax Number or Phone Number: groothuiss@willmar.k12.mn.us

Ph) 320 231 8527 fx) 320 231 8504

Item Data Entered on FCC Form 471 Make Corrections Here

1a. Name of Billed Entity WILLMAR INDEP SCHOOL DIST 347		<p><i>* Addition of 3 Block 5 forms for FRN's</i></p>
3. Billed Entity Number	133854	
6. Contact Person's Name	Shannon Groothuis	
6. Preferred mode of contact	Email	
6c. Contact Phone	320-231-8527	
6e. Email	groothuiss@willmar.k12.mn.us	
6f. Holiday/vacation/summer contact information - if provided		6d. Contact Fax 320-231-8504

The Billed Entity name, address, phone and fax numbers cannot be changed via the RAL correction process. See the "Changes and Corrections" area of our website for guidance.

Block 4

While the RAL does not contain Block 4 Worksheet Information, you are allowed to make the following modifications:

- Delete entities from Block 4
- Add entities to Block 4
- Correct any Block 4 information for an entity (RAL corrections are not required for student counts that don't affect your Program discount.)

To delete an entity;

Provide a separate page stating that you wish to delete the entity and provide:

Application #
Worksheet #
Entity #
Entity Name

To add an entity;

Include an additional page from a blank Form 471 Block 4 Worksheet, available on the Required Forms page on our website. All fields must be completed. Indicate the worksheet number to which this entity should be added or indicate if a new worksheet should be created.

To correct an entity;

Print the Block 4 worksheet for your Form 471 application using the 'Display' button in the Apply Online area of our website and make corrections to the appropriate field.

Block 5

USAC may require additional information before making requested corrections to

471 RAL 726265

*Exhibit C
p. 1 of 1*

Harris Mary

From: Groothuis Shannon
Sent: Tuesday, July 05, 2011 9:47 AM
To: Harris Mary
Subject: FW: Initial Contact, case 22-077952

From: sldnoreply@sl.universalservice.org [sldnoreply@sl.universalservice.org]
Sent: Wednesday, June 16, 2010 3:30 PM
To: Groothuis Shannon
Subject: RE: Initial Contact, case 22-077952

Thank you for your inquiry. You have indicated that you were sending in attachments and we have not received them at this time. The following are the steps necessary to send attachments:

If you have attachments to attach in an email that you are sending through "Submit A Question", you will click on "yes".
You will then receive an email from sldcaseattachments@sl.universalservice.org with instructions on sending the attachments. Your email will contain the following:

Thank you for sending an email inquiry to the SLD. This message serves as a receipt confirmation. Please note that you may also refer to the SLD website <http://www.usac.org/sl/> for program information.

You indicated in your request that you wish to send an attachment. To do this please reply to this message and add your attachment to the reply.

Your case number is 22-077952. Please refer to this number in subsequent contacts with the Client Service Bureau. We may need to request additional information from you in order to completely answer your question or fulfill your request.

You will then click on the tab Attach and then click on file. You will then click on browse to find your file. After you have located your attachment, highlight it, and then click "ok."

If you have any further questions, please feel free to contact our Schools and Libraries Helpline at 1-888-203-8100. Please remember to visit our website for updates:
<http://www.sl.universalservice.org>

Thank you,
Schools and Libraries Division
Universal Service Administrative Company

-----Original Message-----

From: groothuiss@willmar.k12.mn.us
Subject: Initial Contact

[FirstName]=Shannon
[LastName]=Groothuis
[JobTitle]=District Accountant
[EmailAddress]=groothuiss@willmar.k12.mn.us
[WorkPhone]=3202318527

[FaxPhone]=3202318504
[PreviousCaseNumber]=0

[FormType]=Other
[Owner]=TCSB
[DateSubmitted]=6/16/2010 12:38:04 PM
[AttachmentFlag]=Y[Question2]=Our initial Form 471 application number 726265 for FY 10 -11 has not been assigned to a reviewer yet.

I have added 3 additional Block 5's for FRN'S.

--
This message has been scanned for viruses and dangerous content by MailScanner, and is believed to be clean.

Harris Mary

From: Groothuis Shannon
Sent: Thursday, June 17, 2010 8:12 AM
To: sldcaseattachments@sl.universalservice.org
Subject: RE: SLD Inquiry #: 22-077952 Received
Attachments: DOC061710.pdf

Attached are my 3 additional Block 5 for FRN's .

Thank You

Shannon
320 231 8527

From: sldcaseattachments@sl.universalservice.org [mailto:sldcaseattachments@sl.universalservice.org]
Sent: Wednesday, June 16, 2010 11:41 AM
To: Groothuis Shannon
Subject: SLD Inquiry #: 22-077952 Received

Thank you for sending an email inquiry to the SLD. This message serves as a receipt confirmation.

You indicated in your request that you wish to send an attachment. To do this please reply to this message and add your attachment to the reply.

Please note that you may also refer to the SLD website (www.sl.universalservice.org) for program information and view WebEx sessions regarding key E-rate topics, listed below.

Your case number is 22-077952.

Please refer to this number in subsequent contacts with the Client Service Bureau regarding this specific issue. Please do not resubmit this case number if your inquiry pertains to a different issue with respect to the same FRN.

We may need to request additional information from you in order to completely answer your question or fulfill your request.

Here is the information you submitted:

*[FirstName]=Shannon [LastName]=Groothuis [JobTitle]=District Accountant
[EmailAddress]=groothuiss@willmar.k12.mn.us [WorkPhone]=3202318527 [FaxPhone]=3202318504
[PreviousCaseNumber]=0 [FormType]=Other [Owner]=TCSB [DateSubmitted]=6/16/2010 12:38:04 PM
[AttachmentFlag]=Y[Question2]=Our initial Form 471 application number 726265 for FY 10 -11 has not been
assigned to a reviewer yet. I have added 3 additional Block 5's for FRN'S.*

YOUR REPLY IS ONLY FOR TRANSMITTING YOUR ATTACHMENT.

ANY INFORMATION IN THE BODY OF YOUR REPLY MESSAGE WILL BE DISREGARDED.

IF YOU WISH TO SUBMIT ADDITIONAL INFORMATION, PLEASE DO SO USING THE **ASK A QUESTION** FORM AVAILABLE ON THE SLD WEBSITE.

SLD TRAINING PRESENTATIONS

SLD Training Presentations are available on the topics listed below at <http://www.sl.universalservice.org/reference/Presentations2004.asp>.

WEBEX RECORDINGS/LIVE SLD TRAINING SESSIONS

Recorded sessions on key SLD topics are now available on the SLD's WebEx site at universalservice.webex.com. Click on the Recorded Sessions tab under the Attend a Session link to view the available recordings. To view a session, you must register by providing certain information. This information will assist the SLD to better understand how the site is being accessed and to design new training sessions that will be helpful to users.

In addition, you may also register for live WebEx recordings by going to universalservice.webex.com and clicking on Live Sessions under the Attend a Session Tab and then clicking on the Upcoming tab. Please see instructions below for registering for a live session.

The following topics are currently available:

- General Updates/New Initiatives
- Technology Planning
- Form 470 Changes
- Competitive Bidding
- Program Compliance
- Service Provider Perspective
- Form 471 Changes
- Eligible Services
- Miscellaneous PIA Updates
- Audits
- Invoicing
- Appeals
- Commitment Adjustments

[Follow this link to learn how to register to view a recording.](#) [PDF, 714kb]

[Follow this link to learn how to register to log into a live Training Session.](#) [PDF, 312kb]

[Follow this link to the SLD's WebEx site](#)

This message has been scanned for viruses and dangerous content by MailScanner, and is believed to be clean.

Entity Number 133854 Applicant's Form Identifier Internet
 Contact Person Shannon Groothuis Phone Number 320 231 8527

Block 5: Discount Funding Request(s)
 Instructions: Use one Block 5 page for EACH service (Funding Request Number) for which you are requesting discounts. Make as many copies of this page as needed, and number the completed pages to assure that they are all processed correctly.
 Block 5, page of

10 If this is a duplicate Funding Request (e.g., of an FRN that is not yet approved, under appeal, etc.), check this box and enter the original FRN in the space provided:

11 **Category of Service** (only ONE category should be checked)
 PRIORITY 1
 Telecommunications Service
 Internet Access
 PRIORITY 2
 Internal Connections Other than Basic Maintenance
 Basic Maintenance of Internal Connections

12 **Form 470 Application Number**

13 **SPIN - Service Provider Identification Number**
 3155

14 **Service Provider Name**
Charter Fiberlink CCVILL, LLC

15a Check this box if this Funding Request is for non-contracted tariffed or month-to-month services.

15b **Contract Number**

15c Check this box if this Funding Request is covered under a master contract (a contract negotiated by a third party, the terms and conditions of which are then made available to an eligible entity that purchases directly from the service provider)

15d Check this box if this Funding Request is a continuation of an FRN from a previous funding year based on a multi-year contract. If so, provide that FRN here:

16a **Billing Account Number** (e.g., billed telephone number)
8352306800000315

16b Check this box if there are multiple Billing Account Numbers and attach a complete list of those numbers to this page.

17 **Allowable Vendor Selection/Contract Date** (mm/dd/yyyy) (based on Form 470 filing)

18 **Contract Award Date** (mm/dd/yyyy)
01

19 **Service Start Date** (mm/dd/yyyy)

20a **Service End Date** (mm/dd/yyyy)

20b **Contract Expiration Date** (mm/dd/yyyy)

21 **Description of This Service:**
 You MUST attach a description of the service, including a breakdown of components, costs, manufacturer name, make and model number. You must include any additional account or telephone numbers if the billed account has multiple numbers. Label the description with an Attachment Number, and note number in space provided.

22 **Entity/Entities Receiving This Service:**
 a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service:
 b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., 1):

23 **Calculations**

A. Monthly charges (total amount per month for service)
5100.00

B. How much of the amount in A is ineligible?
0

C. Eligible monthly pre-discount amount (A minus B)
5100.00

D. Number of months service provided in funding year

E. Annual pre-discount amount for eligible recurring charges (C x D)
61200.00

F. Annual non-recurring charges

G. How much of the amount in F is ineligible?

H. Annual eligible pre-discount amount for non-recurring charges (F minus G)

I. Total funding year pre-discount amount (E + H)

J. Discount from Block 4 Worksheet 75

K. Funding Commitment Request (I x J)

Attachment

Total Charges

*Exhibit H
p. 1 of 1*

Harris Mary

From: Groothuis Shannon
Sent: Thursday, June 17, 2010 8:19 AM
To: attachments@sl.universalservice.org
Subject: 3 Item 21 Attachments
Attachments: DOC061710.pdf

Hello,

Attached are 3 Item 21 attachments which relate to 3 additional block 5 that were an addition to the revised Form 471 application 726565 *726265*

Each block 5 and item 21 attachments are labeled as

1 of 3

2 of 3

3 of 3

Thanks

*Shannon Groothuis, District Accountant
Willmar Public Schools
611 SW 5th Street
Willmar, MN 56201
P) 320 231 8527
F) 320 231 8504*

Telecommunication Services

ITEM 21 Attachment

Applicant: Willmar Independent School District **BEN:** 133854

471 Application #: 726/65 726265 **Service Provider:** Enventis

Attachment: 1 OF 3 **SPIN:** 143003845

Narrative Description: Standard Phone services for school district

Service Type: Combined T1 and long distance service

Eligible Prediscounted Cost: \$18,005.76

*Exhibit J
p. 1 of 1*

Telecommunication Services

ITEM 21 Attachment

Applicant: Willmar Independent School District **BEN:** 133854

471 Application #: 726~~65~~ 726265 **Service Provider:** TDS Metrocom

Attachment: 2 OF 3 **SPIN:** 143001158

Narrative Description: Standard Phone services for school district

Service Type: Basic Telephone Service

Eligible Prediscounted Cost: \$23,280.60

*Exhibit K
p. 1 of 1*

Internet Access Services

ITEM 21 Attachment

Applicant: Willmar Independent School District **BEN:** 133854

471 Application #: 726365 *726265* **Service Provider:** Charter Fiberlink CCVIII, LLC

Attachment: 3 OF 3 **SPIN:** 143033155

Narrative Description: Digital Transmission Service used to connect to the internet and link the WAN for the school district

Service Type: DTS Service

Eligible Prediscounted Cost: \$61,200.00

*Exhibit L
p. 1 of 1*



Universal Service Administrative Company

Schools and Libraries Division



FUNDING COMMITMENT DECISION LETTER
(Funding Year 2010: 07/01/2010 - 06/30/2011)

June 14, 2011

Shannon Groothuis
WILLMAR INDEP SCHOOL DIST 347
611 5th St SW
Willmar, MN 56201

Re: Form 471 Application Number: 726265
Billed Entity Number (BEN): 133854
Billed Entity FCC RN: 0002608586
Applicant's Form Identifier: 3 Media

Thank you for your Funding Year 2010 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$4,725.00 is "Approved."
- The amount, \$13,266.45 is "Denied."

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation Form. A guide that provides a definition for each line of the Report is available in the Reference Area of our website.

NEXT STEPS

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements
- Review CIPA requirements
- File Form 486
- Invoice USAC using the Form 474 (service provider) or Form 472 (Billed Entity applicant) - as products and services are being delivered and billed

TO APPEAL THIS DECISION:

You have the option of filing an appeal with the SLD or directly with the Federal Communications Commission (FCC).

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and (if available) email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN),
 - Form 471 Application Number 726265 as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2010," AND

Exhibit M
p. 1 of 4

- The exact text or the decision that you are appealing.
- 3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
- 4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
- 5. Provide an authorized signature on your letter of appeal.

To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org. USAC will automatically reply to incoming emails to confirm receipt.

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

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

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

If you wish to appeal a decision in this letter to the FCC, you should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our website. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

OBLIGATION TO PAY NON-DISCOUNT PORTION

Applicants are required to pay the non-discount portion of the cost of the products and/or services to their service provider(s). Service providers are required to bill applicants for the non-discount portion. The FCC stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If USAC is being billed via the FCC Form 474, the service provider must bill the applicant at the same time it bills USAC. If USAC is being billed via the FCC Form 472, the applicant pays the service provider in full (the non-discount plus discount portion) and then seeks reimbursement from USAC. If you are using a trade-in as part of your non-discount portion, please refer to our website for more information.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company

Exhibit M
p. 2 of 4

FUNDING COMMITMENT REPORT
Billed Entity Name: WILLMAR INDEP SCHOOL DIST 347
BEN: 133854
Funding Year: 2010

Comment on RAL corrections: RAL changes requested were not implemented because the RAL request was received late.



Form 471 Application Number: 726265
Funding Request Number: 2027012
Funding Status: Funded
Category of Service: Telecommunications Service
Form 470 Application Number: 914110000809048
SPIN: 143032646
Service Provider Name: SHOUTPOINT, INC.
Contract Number: 101521
Billing Account Number: 3202318500
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2010
Service End Date: N/A
Contract Award Date: 02/08/2010
Contract Expiration Date: 06/30/2011
Shared Worksheet Number: 1180549
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$6,300.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$6,300.00
Discount Percentage Approved by the USAC: 75%
Funding Commitment Decision: \$4,725.00 - FRN approved as submitted

FCDL Date: 06/14/2011
Wave Number: 053
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2012

*Exhibit M
p. 3 of 4*

FUNDING COMMITMENT REPORT
Billed Entity Name: WILLMAR INDEP SCHOOL DIST 347
BEN: 133854
Funding Year: 2010

Comment on RAL corrections: RAL changes requested were not implemented because the RAL request was received late.

Form 471 Application Number: 726265
Funding Request Number: 2027231
Funding Status: Not Funded
Category of Service: Telecommunications Service
Form 470 Application Number: 914110000809048
SPIN: 143000677
Service Provider Name: Verizon Wireless
Contract Number: GS-35F-0119P
Billing Account Number: 3202318500
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2010
Service End Date: N/A
Contract Award Date: 04/15/2010
Contract Expiration Date: 06/30/2011
Shared Worksheet Number: 1180549
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$17,688.60
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$17,688.60
Discount Percentage Approved by the USAC: 75%
Funding Commitment Decision: \$0.00 - Contract Violation
Funding Commitment Decision Explanation: MR1: The Contract Award Date was changed from 1.15.10 to 4.15.10 to agree with the documentation provided during the review of the Form 471. <><><><><> DR1: No contract was in place when the Form 471 certification was filed. FCC Rules require that a contract be signed and dated by the applicant prior to the filing of the Form 471 Certification for the products/services requested.

FCDL Date: 06/14/2011

Wave Number: 053

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2012

*Exhibit M
p. 4 of 4*