

Attachment #9 PIA Document

Dear Lynda Crawford,  
Attached is a 15 day letter requesting additional information concerning your Application #729408.

Ms Crawford: 8/10/10 3:45

Ellen O'hara  
973-581-7552  
E-Rate Program

Aug 10, 2010

Lynda Crawford

NESHOPA COUNTY SCHOOL DISTRICT

Telephone:

(601) 6563752

Application Number

729408

**Response Due Date: August 25, 2010**

The Program Integrity Assurance (PIA) team is in the process of reviewing all Funding Year 2010 Form 471 Applications for schools and libraries discounts to ensure that they are in compliance with the rules of the Universal Service program. We are currently in the process of reviewing your Funding Year 2010 Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

**I. Service Review.**

You indicated on your Forms 471 Item 25d that zero dollars are allocated to the resources not eligible for E-rate support. This line represents the resources that are necessary for you to support and improve education and library services to make effective use of the eligible services you have requested in all Block 5 requests across all Forms 471. The resources may include but not limited to:

- Hardware, such as computers, printers, fax machines, video equipment, scanners, CD-ROM drives, and servers;
- \* Professional development, such as ongoing technology-related training for technical staff, teachers and/or librarians;
- \* Software, such as end-user applications;
- \* Maintenance, such as systems maintenance and operations costs for ineligible hardware and software and salaries of technical staff;
- \* Retrofitting, such as electrical wiring, asbestos removal, building modifications, renovations, and repairs.

**Did you intend to put zero in this line?**

Yes

No

**If yes,** please explain the resources and strategies you have in place to support each of the above categories.

**If no,** please provide the dollar amount you have in your budget for the aforementioned necessary resources

65,000.00

**II. Discount**

Based upon review of your Form 471 application and/or the documentation you provided, we were not able to determine the eligibility of **Neshoba County Schools Office of Federal Programs**. In order to be eligible to receive discounted services, per the rules of this program, the entity providing classroom instruction must be considered part of an elementary or a secondary school found in the No Child Left Behind Act of 2001 (20 U.S.C. Section 7801 (18) and (38)) which is not operating as a for-profit businesses, and does not have an endowment exceeding \$50 million. Please provide documentation that will verify that the entity meets the definition provided above.

If this entity is a non-instructional facility, it can be eligible for services under certain circumstances. For Application #729408, please provide a written **Yes/No** response indicating whether either of these two following descriptions accurately and completely describes your school, school district or library's situation, and if so, which one or both:

*This is an instr. facility*

- 1. Is the non-instructional facility used solely for school, school district or library business? \_\_\_Yes \_\_\_No
- 2. Do only school, school district or library employees use the non-instructional facility? \_\_\_Yes \_\_\_No
- 3. If you responded no to either question, is a portion of the facility used for school or library business?  
Yes \_\_\_ No \_\_\_
- 4. If yes, please provide a cost allocation for the portion of the facility used for school, school district or library business.
- 5. Are there any classrooms in the non-instructional facility? \_\_\_Yes \_\_\_No

(Note: Your response should be based on the amount of funds you are requesting, which may be after cost allocation has taken place. For example, a school could identify the school portion of a combined church/school phone bill and identify that portion that is "used for school business by school employees.")

For further information about funding requests to non-instructional facilities, consult the "Educational Purposes" document at <http://www.usac.org/sl/applicants/step06/educational-purposes.aspx>

**III. Multiple Entities in Same Physical Location.**

We have determined that you have multiple entity numbers for the same physical location/entity on Form 471, **Application #729408**:

- Neshoba County Schools Office of Federal Programs (Entity Number #16043427)
- Neshoba County Pre-K (Entity Number # 16053273)

USAC wishes to merge your funding requests to one entity, since the entities occupy the same physical address. You may be requesting duplicate funding as a result of having multiple entity numbers. Seeking duplicate funding is a violation of program rules. If you wish to cancel the Forms 471 or FRNs, or remove an entity from Block 4, please provide that information in writing.

*How to merge*

If these are not the same entities, please provide USAC with a statement or an explanation detailing why this is the case.

**IV. Contract**

*For*

The rules of this program require that a signed and dated contract with the service provider be in place at the time of the submission of the FCC Form 471 certification.

**For Application #729408, please provide a copy of the contract MS2010-NES001-E, signed by the applicant and dated, to verify the Contract Award Date ("CAD").** Failure to provide a signed and dated contract may be cause for denial. If the contract is a State Master Contract, you do not have to submit a copy of the signed contract if that contract is available online or has already been submitted to PIA. Please provide us with the contract name and number of the State Master Contract. If you have already submitted the relevant contract information in connection with another review, please provide the FCC Form 471 application number involved so that we can locate the documentation in our files.

For further guidance regarding CADs, please refer to the Schools and Libraries Division website at: Step 4: Select a Service Provider at [www.usac.org/sl/applicants/step04/default.aspx](http://www.usac.org/sl/applicants/step04/default.aspx).

**Is the Form 470 # 281180000783365 on your FY2010 Form 471 application # 729408 the establishing Form 470 for services associated with all of the Funding Requests on this application?**

**Yes or No.**

**If No, please provide the following information:**

- Please provide the 15-digit Form 470 Number that established the bidding for the FRN. The establishing Form 470 is the specific Form 470, which was posted for that particular service for 28 days,

and pursuant to which a contract was signed or an agreement was entered into.

**If Yes, please provide the following information:**

For all FRNs on Application #729408, the CAD for the services requested is **06/30/2010**, which is after the Certification Postmark Date (CPD) of **02/04/2010** of your FY2010 Form 471 application # 729408. Was the incorrect CAD entered at the time the Form 471 was completed?

Yes or No

**If Yes, please provide the following information:**

- Provide USAC with the correct Contract Award Date

**V. Service Review**

For **FRN 1973446**, The PBX system you are requesting funding for may contain products that are eligible for funding, or not eligible for funding, depending on how they are used. The products/services being requested may have some ineligible functions including, but not limited, to: Check that which applies:

- Redundant Hard Drives Yes \_\_\_ No X
- Automatic call distribution(ACD) (ineligible if a separate cost was provided) Yes \_\_\_ No X

If **YES**, the ineligible function must be cost allocated out of the funding request. The full SLD administrative policy for such products and services is provided in "Cost Allocation Guidelines for Products and Services that Contain Eligible and Ineligible Components," <http://www.sl.universalservice.org/reference/costallocationguide.asp>

Please provide a cost allocation of the ineligible functions (to include all related costs such as installation, maintenance, taxes, etc).

For the following ineligibles the amount to be allocated out is:

- \* Redundant Hard Drives \$ \_\_\_\_\_
- \* automatic call distribution(ACD) \$ \_\_\_\_\_

Please fax or email the requested information to my attention. If you have any questions or you do not understand what we are requesting, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review. **Failure to respond may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible.**

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), and the complete name, title and signature of the authorized individual.

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

Ellen B. O'Hara

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Program Integrity Assurance  
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**SLD Forms**  
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