



LYME - OLD LYME PUBLIC SCHOOLS

Impassioned with Pride and Purpose

February 8, 2012

Letter of Appeal
Schools and Libraries Division – Correspondence Unit
100 South Jefferson Road, P.O. Box 902
Whippany, NJ 07981

Received & Inspected

MAY 03 2012

FCC Mail Room

Applicant:
Regional School District 18
Contact Person: John Rhodes
53 Lyme Street, Old Lyme, CT 06371
Applicant Form 471 Identifier: 806009

This is a letter of appeal the denial letter to the Form 471 application: 806009

Denial Explanation: The FRN was denied because it is claimed that the Item 21 Attachment was not received on or before the filing deadline. Documentation that the Item 21 Attachment was transmitted was not submitted.

We received a letter dated January 18, 2012 stating that our Form 486 Item was not submitted and that we failed to prove that it was submitted by the required deadline. I have attached the Item 21 Attachment which was faxed on 3/18/2011 before the deadline as required by the program. In addition, I have attached the USAC instructions for submitting Item 21 Attachments. The USAC web site instructions do not require that proof of transmittal be obtained to verify to USAC of Item 21 Attachment transmittal. Based on the USAC web site, program rules do not require proof of transmittal of Item 21 Attachments. Our position is Regional School District 18 met filing deadlines and met all program rules as instructed in the USAC web site. Please reconsider your decision based the USAC web site instructions for Item 21 Attachment submittal.

Respectively

John A. Rhodes
Director of Facilities & Technology
/attachments

JOHN RHODES, DIRECTOR OF FACILITIES & TECHNOLOGY

53 Lyme Street, Old Lyme, Connecticut 06371

T: 860-434-8182 F: 860-434-4412 E: jrhodes@region18.org www.region18.org

Server Error in '/MFPIN/EPDPublic/_Item21' Application.

Server cannot access application directory 'D:\www_sites\prod\dotnetexternal\MFPIN\EPDPublic_Item21\'. The directory does not exist or is not accessible because of security settings.

Description: An unhandled exception occurred during the execution of the current web request. Please review the stack trace for more information about the error and where it originated in the code.

Exception Details: System.Web.HttpException. Server cannot access application directory 'D:\www_sites\prod\dotnetexternal\MFPIN\EPDPublic_Item21\'. The directory does not exist or is not accessible because of security settings.

Source Error:

An unhandled exception was generated during the execution of the current web request. Information regarding the origin and location of the exception can be identified using the exception stack trace below.

Stack Trace:

```
[HttpException (0x80004005): Server cannot access application directory 'D:\www_sites\prod\dotnetexternal\MFPIN\EPDPublic\_Item21\'. The directory does not exist or is not accessible because of security settings.]
System.Web.HttpRuntime.EnsureAccessToApplicationDirectory() +8932031
System.Web.HttpRuntime.HostingInit(HostingEnvironmentFlags hostingFlags) +87

[HttpException (0x80004005): Server cannot access application directory 'D:\www_sites\prod\dotnetexternal\MFPIN\EPDPublic\_Item21\'. The directory does not exist or is not accessible because of security settings.]
System.Web.HttpRuntime.FirstRequestInit(HttpContext context) +8894095
System.Web.HttpRuntime.EnsureFirstRequestInit(HttpContext context) +85
System.Web.HttpRuntime.ProcessRequestInternal(HttpWorkerRequest wr) +259
```

Version Information: Microsoft .NET Framework Version 2.0.50727.3615, ASP.NET Version.2.0.50727.3618

*need to
fix/mv*

Item 21 Attachment

Applicant: Regional School District 18
 BEN: 122429
 Identifier: PTP Fiber

Attachment: PTP Fiber
 471 Application: 806009

Provide fiber-optic connection service between schools as part of the District's wide area network.

Quantity	Product or Service Description	Unit Cost/Mth	Extended Pre-discount Cost	
			Recurring	Non-Recurring
12	Point to Point Optic Service	\$3270	\$39,240.00	\$0
		Total:	\$39,240.00	\$0



Online Item 21 Attachment

You may use this automated system to create and electronically submit your Item 21 Attachment for FCC Form 471. To use this interface you must have already submitted an electronically-filed Form 471 and know the Security Code provided during that process.

For each Item 21 Attachment you file online, the service provider whose SPIN is featured on the associated FRN will be able to view and download the information specific to that FRN once you click the "Submit Item 21" button.

USAC encourages the use of this online filing system. However Item 21 Attachments also may be manually submitted by mail, by fax, or by e-mail. [Click here](#) for further information about manual filing options.

After May 18, you will be able to view your online attachment but you will not be able to modify or submit an attachment.

Please provide this information to begin.

Billed Entity
Number:

Application
Number:

Form 471 Security
Code:

[Continue](#) 

[SLD Home](#) | Phone: 1-888-203-8100 | [Submit a Question](#)

4. How to File the Item 21 Attachment

An online system is available for creating and submitting Item 21 Attachments. (In the menu of choices for Form 471, choose "Item 21 Attachment."). A training site for this system is also available. Alternatively, the Item 21 Attachment can be manually submitted to USAC by email, fax, U.S. mail, courier, or as part of a Form 471 application or Form 471 Block 6 Certification submitted on paper. It is preferable for you to use no more than one of these methods to submit your Item 21 Attachments. For example, if you submit both an online and paper Item 21 Attachment but there are differences between the two documents with regard to items, cost or ineligibles, the processing of your application will be delayed.

The attachment should include this information:

A label of "Form 471 Item 21 Attachment"

The applicant's name

The Attachment Number specified for the Item 21 Attachment in the Form 471, Block 5

If the Item 21 Attachment is being submitted separately from the Form 471, then the attachment or a cover letter must also include:

The applicant's Billed Entity Number

The Form 471 application number if one was assigned through electronic filing or the Form 471 Applicant Form Identifier if the Form 471 was filed on paper

The Item 21 Attachment must be received before USAC can begin review of a Form 471 application. For FY2011 the Item 21 Attachment is a window filing requirement and must be filed in a timely fashion so that USAC can review the information, make a determination of product and service eligibility, and provide a prompt funding decision.

If at the time of application review, the reviewer fails to see that an Item 21 Attachment has been filed, they may contact the applicant and request that this information be provided via the online system, or directly to the reviewer by email or fax. In other cases, manually filed Item 21 Attachments should be submitted in either of the following ways.

Send submissions via email. Do not send submissions other than Form 471 Item 21 Attachments to this email address. Documents may be sent in most commercially available word processing or spreadsheet formats. Scanned documents may also be sent. (TIF file format is preferred.) Total file size of the email message must be less than 10 Megabytes. If you have more than one Form 471 application, do not combine Item 21 Attachments from other Form 471 applications in the same email message.

Send submissions via fax to (973) 599-6511. Do not send submissions other than Form 471 Item 21 Attachments to this fax number.

Send submissions via USPS to SLD Forms, Form 471-Item 21 Attachment, P.O. Box 7026, Lawrence, KS 66044-7026. For courier delivery services or U.S. Postal Service Return Receipt Requested, send to SLD Forms, ATTN: Form 471-Item 21 Attachment, 3833 Greenway Drive, Lawrence, KS 66046, Phone 1-888-203-8100.



Universal Service Administrative Company

Schools and Libraries Division

FUNDING COMMITMENT DECISION LETTER
(Funding Year 2011: 07/01/2011 - 06/30/2012)

January 18, 2012

John Rhodes
REGIONAL SCHOOL DISTRICT 18
4 DAVIS ROAD WEST
OLD LYME, CT 06371-2335

Re: Form 471 Application Number: 806009
Billed Entity Number (BEN): 122429
Billed Entity FCC RN: 0012076592
Applicant's Form Identifier: PTP Fiber

Thank you for your Funding Year 2011 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, \$17,658.00 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 806009 as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2011," AND
 - The exact text or the decision that you are appealing.

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl

FUNDING COMMITMENT REPORT
Billed Entity Name: REGIONAL SCHOOL DISTRICT 18
BEN: 122429
Funding Year: 2011

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 806009
Funding Request Number: 2185920
Funding Status: Not Funded
Category of Service: Telecommunications Service
Form 470 Application Number: 751560000615508
SPIN: 143001305
Service Provider Name: The Southern New England Telephone Company
Contract Number: N/A
Billing Account Number: 860-434-2568
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2011
Service End Date: N/A
Contract Award Date: 02/06/2007
Contract Expiration Date: 06/30/2012
Shared Worksheet Number: 1344771
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$39,240.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$39,240.00
Discount Percentage Approved by the USAC: 45%
Funding Commitment Decision: \$0.00 - Insufficient documentation
Funding Commitment Decision Explanation: DR1: This FRN is denied because the Item 21 Attachment was not received on or before the filing deadline. The Item 21 Attachment is an FCC Form 471 Window filing requirement. You failed to provide sufficient documentation demonstrating the Item 21 Attachment was submitted timely. FCC Forms 471 with Item 21 Attachments that met the FCC Form 471 Window requirements have funding priority over applications received after the filing deadline. Given that funding demand for FCC Forms 471 filed within the window exceeds the amount available for commitment, we cannot consider this FRN for funding.

FCDL Date: 01/18/2012
Wave Number: 030
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2012
Consultant Name:
Consultant Number (CRN):
Consultant Employer:



USAC

Universal Service Administrative Company
Schools and Libraries Division

Correspondence Unit
30 Lanidex Plaza West
PO Box 685

Parsippany, NJ 07054-0685

TIME SENSITIVE MATERIAL

00011
John Rhodes
REGIONAL SCHOOL DISTRICT 18
4 DAVIS ROAD WEST
OLD LYME, CT 06371-2335