



Lowndes County Public Schools

Daniel Boyd Ph.D.
Superintendent

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June 21, 2012

Received & Inspected

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CC Mail Room

Letter of Appeal
FCC
Office of the Secretary,
445 12th Street SW
Washington, DC 20554

RE: CC Docket No. 02-6

To Whom It May Concern:

Request for Review of the decision of the Universal Service Administrator on the funding decisions referenced below.

Billed Entity Name: Lowndes County School District
Billed Entity Number: 128068
FCC Form 471 Application Number: 820078
Funding Request Number: 2231881

Contact Information:
Name: Dr. Benitha D. Mathews
Address: 80 Commerce St. S.
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Introduction

On March 27, 2012, Lowndes County received a Funding Commitment Decision letter for Funding Year 2011: 07/01/2011 – 06/30/2012 from USAC indicating;

MR2: The amount of our funding request was changed from \$4,127.50/monthly to \$2,000.00/monthly to remove the ineligible product /service; Firewall at \$2,127.50/monthly.

Discussion

The Firewall service that is being provided to Lowndes County Schools District is a standard configuration of the Internet Access Service being provided by the vendor. The vendor's firewall service does provide ineligible Content Filtering, and Lowndes County Schools

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performed a cost allocation to remove that portion from the funding request in our Funding Request application.

In the Eligible Services List for Funding Year 2011 the following examples are listed, which allow for the Firewall Service to be an Eligible Service.

Page 8, Internet Access Section

Eligible Internet access may include features typically provided for adequate functionality and performance when provided as a standard component of a vendor's Internet access service. Such features may include Domain Name, Dynamic Host Configuration, and basic firewall protection against unauthorized access.

Page 12, Data Protection Section

Data protection components are used to ensure the continued operation of eligible equipment by protecting equipment and computer files from environmental or security hazards. The following components are eligible if used to provide basic and reasonable measures for data protection:

Firewall, if included in the standard configuration of an Internet access service

Page 14, Server Section

A server can be eligible or not eligible, depending on how it is used. An eligible server must serve as a conduit for information rather than as a source for content. Servers typically provide multiple functions. If servers are used for both eligible and ineligible purposes, the cost of the ineligible portion must be cost allocated. The following uses are eligible:

Firewall, if included in the standard configuration of an Internet access service

Lowndes County School District believes our services fall into all three eligible scenarios that are listed in the Eligible Services List for Funding Year 2011 , and we request that the FCC grant our appeal to have the funding request returned to the amounts of the original funding request. The managed firewall service provides the school district with basic firewall service & content filtering. We have also provided a cost allocation for the content filtering portion.

Please see the original request figures below;

FRN# 2231881

Monthly Charges: \$4,425.00 (20Mbps Internet Access w/ Managed Firewall Service (basic firewall service, content filtering)

Monthly Ineligible: \$297.50 (content filtering)

Eligible Monthly pre-discount: \$4,127.50

Annual pre-discount amount for eligible recurring charges: \$49,530.00

Funding Commitment Request: \$44,577.00

Thank you for the opportunity to reach a resolution, and we look forward to receiving your decision.

Sincerely,

A handwritten signature in black ink that reads "Benitha D. Mathews". The signature is written in a cursive style with a large, prominent initial "B".

Benitha D. Mathews, Ed.D
District Technology Coordinator
Lowndes County Public Schools
Phone: 334-548-2131
Fax: 334-548-5513

Attachments:

1. USAC Funding Commitment Decision Letter, Dated March 27, 2012