

**Request for Review**

**CC Docket No. 02-6**

**Federal Communications Commission**

Dear Sir or Madam:

I am submitting a letter of appeal requesting review of a funding decision made by USAC.

I have already submitted an appeal to USAC and the appeal has been denied.

USAC has denied funding for (2) applications, citing that there was no contract in place when FCC Form 471 was filed and certified.

The sequence of dates is as follows:

- Form 470 for services posted 1/17/2011
- Allowable contract date 2/14/2011
- Board of Education approved contract 3/7/2011
- Contract Form signed by vendor 3/11/2011
- Form 471(s) filed 3/15/2011
- Contract Form signed by Treasurer 3/16/2011

Attached to this letter of appeal is a review of the vendor contract by attorney David J. Riley who has been working with the district during this construction project. His opinion is that under Ohio law the contract was entered into by the Board of Education and the vendor (Zenith) when the Board of Education approved the contract on March 7, 2011.

I respectfully request that you review the documentation provided and instruct USAC to approve funding.

Thank you.



Darrell Bartkowski

Euclid City Schools

(216) 797-2960

(216) 289-8849 Fax

[dbartkowski@euclid.k12.oh.us](mailto:dbartkowski@euclid.k12.oh.us)

Attachments:

- Letter from David J. Riley
- Appeal denials from USAC (2)
- Appeal acknowledgement from USAC
- Appeal letter to USAC
- Board of Education resolution to enter into contract with Zenith
- FCDL denial letters (2)

Applicant name: Euclid City School District

BEN: 129493

Form 471: 801252, 784661

FRN: 2171212, 2169476

**The Riley Law Firm**  
**24502 Cornerstone**  
**Westlake, OH 44145**  
**Phone: (440)801-1960**  
**Fax: (440)801-1961**  
**Email: Rileylaw@adelphia.net**

July 17, 2012

Darrell Bartkowski  
Director of MIS  
Euclid City School District  
651 East 222<sup>nd</sup> Street  
Euclid, OH 44123

RE: Legal Services Rendered

Dear Mr. Bartkowski:

I understand that the District's Form 471 application numbers 801252 and 784661 and Funding Request numbers 2171212 and 2169476 have been denied by the Universal Service Administrative Company ("USAC"). USAC stated its basis for denial on its conclusion that a contract was not in place when the Form 471 was filed. You have asked me to review the facts and circumstances relating to the Form 471 application and provide my analysis on whether a contract was in place prior to March 15, 2011 the date of the Form 471 filing.

You have provided me with copies of the Administrator's Decision on Appeal for each Form 471 application each dated June 25, 2012 and a copy of the Board resolution which I drafted for the special meeting on March 7, 2011. I have also reviewed the bidding documents, Ohio law and the contract form.

The bidding documents were extremely thorough. They were available to the bidding community on January 17, 2011 when the form 471 and a legal notice were published. There were hundreds of pages of "front end" documents covering the terms and conditions of the work, change orders, insurance and other standard contractual issues. Additionally the plans and specifications for the work were also lengthy and very detailed. The contractor submitted its bid based on the bidding documents and its bid by law must be unequivocal. Once the bid was submitted, there was nothing to negotiate. The Board could either accept or reject the bid.

Under contract law, a contract is formed when there is an offer, an acceptance and consideration. The Board of Education authorized the solicitation of bids based on a non-negotiable set of detailed documents. Zenith Systems, LLC submitted a bid (an offer).

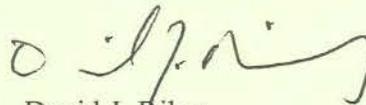
The Board accepted that offer by resolution on March 7, 2011. The consideration for the contract would be the work to be performed by Zenith and the payment for that work by Euclid CSD. A contract was formed on March 7, 2011 when the bid was accepted by the Board of Education at its special meeting. The contractor signed the contract form on March 11, 2011 and the District signed on March 16, 2011. The contract form replaces and evidences the contract entered into by the Board on March 7, 2011 when it accepted the bid.

Ohio Revised Code Section 3313.33 provides that: "No contract shall be binding upon any board unless it is made or authorized at a regular or special meeting of such board." The resolution was made at a special board meeting and the contract was unanimously approved by the board members in attendance (one board member was absent). Pursuant to Ohio Revised Code Section 3313.33 the contract was made and authorized by the Board on March 7, 2011 when the Board manifested its acceptance of the bid.

The bidder can withdraw its bid prior to Board award as provided for in the Ohio Revised Code. However, once the Board awards the contract, the bidder becomes the contractor and can no longer withdraw its bid. Additionally, the contractor's liability begins at the point of award of the contract. If for some reason the contractor did not sign the contract form, it would still be financially liable under the contract documents for the certain expenses of the Board relating to its failure to sign the contract form.

It is my opinion, that under Ohio Law, a contract was formed between the Board of Education and Zenith Systems, LLC on March 7, 2011 for the work covered by form 471 application numbers 801252 and 784661 and Funding Request numbers 2171212 and 2169476.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Riley", written in a cursive style.

David J. Riley  
The Riley Law Firm



Universal Service Administrative Company  
Schools & Libraries Division

---

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

June 25, 2012

Darrell Bartkowski  
Euclid City School District  
651 E 222nd St  
Euclid, OH 44123-2031

Re: Applicant Name: EUCLID CITY SCHOOL DISTRICT  
Billed Entity Number: 129493  
Form 471 Application Number: 801252  
Funding Request Number(s): 2171212  
Your Correspondence Dated: June 14, 2012

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): 2171212  
Decision on Appeal: **Denied**  
Explanation:

- According to our records, it was determined that no contract was in place when the FCC Form 471 and Certification was filed. FCC Rules require that a contract be signed and dated by the applicant prior to the filing of the FCC Form 471 for the products/services requested. USAC cannot waive the rules of the program. Since your contract was signed and dated on March 16, 2011 which was after the Certification Postmark Date of March 14, 2011, your appeal is denied.
- USAC has determined, that at the time you submitted your FCC Form 471 application, you did not have a contract with your service provider(s), which meets your state and local or the FCC's definition of a contract. Additionally, the services you requested are not non-contracted tariff or month-to-month services. Except for services to be delivered under non-contracted tariff or month-to-month

arrangements, FCC rules require that applicants submit a completed FCC Form 471 "upon signing a contract for eligible services." *See* 47 C.F.R. sec. 54.504(a). In your appeal, you did not demonstrate that USAC's decision was incorrect. As USAC does not have authority to waive the FCC rules of the program, your appeal is denied.

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

Darrell Bartkowski  
Euclid City School District  
651 E 222nd St  
Euclid, OH 44123-2031

Billed Entity Number: 129493  
Form 471 Application Number: 801252  
Form 486 Application Number:



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

June 25, 2012

Darrell Bartkowski  
Euclid City School District  
651 E 222nd St  
Euclid, OH 44123-2031

Re: Applicant Name: EUCLID CITY SCHOOL DISTRICT  
Billed Entity Number: 129493  
Form 471 Application Number: 784661  
Funding Request Number(s): 2169476  
Your Correspondence Dated: June 14, 2012

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): 2169476  
Decision on Appeal: **Denied**  
Explanation:

- According to our records, it was determined that no contract was in place when the FCC Form 471 and Certification was filed. FCC Rules require that a contract be signed and dated by the applicant prior to the filing of the FCC Form 471 for the products/services requested. USAC cannot waive the rules of the program. Since your contract was signed and dated on March 16, 2011 which was after the Certification Postmark Date of March 14, 2011, your appeal is denied.
- USAC has determined, that at the time you submitted your FCC Form 471 application, you did not have a contract with your service provider(s), which meets your state and local or the FCC's definition of a contract. Additionally, the services you requested are not non-contracted tariff or month-to-month services. Except for services to be delivered under non-contracted tariff or month-to-month

arrangements, FCC rules require that applicants submit a completed FCC Form 471 "upon signing a contract for eligible services." *See* 47 C.F.R. sec. 54.504(a). In your appeal, you did not demonstrate that USAC's decision was incorrect. As USAC does not have authority to waive the FCC rules of the program, your appeal is denied.

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

Darrell Bartkowski  
Euclid City School District  
651 E 222nd St  
Euclid, OH 44123-2031

Billed Entity Number: 129493  
Form 471 Application Number: 784661  
Form 486 Application Number:



**Universal Service Administrative Company**  
Schools & Libraries Division

---

**Administrator's Appeal Acknowledgement Letter**  
(Funding Year 2011: 07/01/2011 – 06/30/2012)

June 14, 2012

Darrell Bartkowski  
EUCLID CITY SCHOOL DISTRICT  
651 E 222ND ST  
EUCLID, OH 44123-2031

**Subject: EUCLID CITY SCHOOL DISTRICT**

Darrell Bartkowski,

Universal Service Administrative Company has received your correspondence, dated June 14, 2012, on June 14, 2012, regarding the FY 2011 funding decision of your Form 471 Application Numbers;

801252 – FRN 2171212  
and 784661 – FRN 2169476.

These are the steps that will now follow:

1. We will review your correspondence carefully to identify the specific issue(s) it raises.
2. We will consult the Program Integrity Assurance records and all supporting documentation for the application. Our goal is to determine whether the program rules were administered appropriately in processing your application.
3. Once the review process is completed we will respond in writing and state whether your appeal is approved, denied or approved in part. A Revised Funding Commitment Decision Letter will follow for any approved appeal resulting in additional discounts for your application. Funds have been set aside to implement funding decisions for appeals approved by the USAC and/or the Federal Communications Commission.

We will perform an in-depth review of your appeal. Our goal is to respond to you as promptly as possible. We thank you in advance for your patience as we handle your appeal with the care and attention it deserves.

Universal Service Administrative Company

## Appeal for Funding Commitment Decision Letter for Funding Year 2011

Euclid City Schools

BEN: 129493

Form 471: 801252, 784661

FRN: 2171212, 2169476

SPIN: 143034681, 143034681

Text of Denial: No contract was in place when the Form 471 certification was filed.

### Basis for appeal:

The sequence of dates is as follows:

- Form 470 for services posted 1/17/2011
- Allowable contract date 2/14/2011
- Board of Education approved contract 3/7/2011
- Contract Form signed by vendor 3/11/2011
- Form 471(s) filed 3/15/2011
- Contract Form signed by Treasurer 3/16/2011

Attached is a copy of the Board of Education resolution (11-3-75) accepting the results of the Technology Bid Package and authorizing the contract with Zenith LLC for \$2,928,812. This contract includes the work for the Form 471s as noted above.

According to Ohio law ORC 3313.17, the board of education has the authority to contract with other parties in order to administer Ohio's system of education.

Due to a clerical error, the contract was not signed by the Treasurer on March 15, but was signed the next day.

I respectfully request that the funding be approved.

Contact Information:

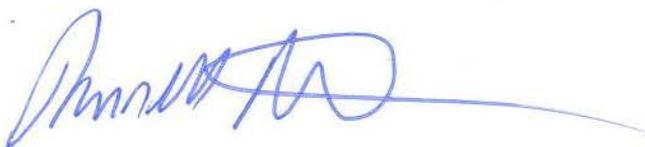
Darrell Bartkowski

Euclid City Schools

(216) 797-2960

(216) 289-8849 Fax

[dbartkowski@euclid.k12.oh.us](mailto:dbartkowski@euclid.k12.oh.us)



The Board of Education of the Euclid City School District met in special session at 6:30 p.m. on March 7, 2011 at the Board Offices, 651 East 222nd Street Euclid, OH 44123 with the following members present:

Mr. Kent Smith

Mrs. Donna Sudar

Mrs. Barry Sweet

Mrs. Kay F. Van Ho

The Treasurer advised the Board that the notice requirements of Section 121.22 of the Revised Code and the implementing rules adopted by the Board pursuant thereto were complied with for the meeting.

Mrs. Van Ho moved the adopted of the following resolution:

**A RESOLUTION ACCEPTING THE RESULTS OF THE TECHNOLOGY BID PACKAGES AND AUTHORIZING A CONTRACT WITH ZENITH SYSTEMS, LLC IN CONNECTION WITH THE DISTRICT'S OHIO SCHOOL FACILITIES COMMISSION PROJECT IN AN AMOUNT NOT TO EXCEED \$2,928,812.**

**RESOLUTION NO. 11-3-75**

WHEREAS, the Board and Administration solicited bids for the technology work associated with the four new schools in connection with the District's Ohio School Facilities Commission Project ("Project"); and

WHEREAS, the technology bid is the first part of the project to be bid in order to seek E-rate reimbursement from the Universal Services Administrative Corporation; and

WHEREAS, there was a technical but minor inconsistency between the bid documents and the bids received relating to providing certain detailed breakdown of the bid pricing that will assist the District in seeing e-rate reimbursement; and

WHEREAS, the District's legal counsel has opined that the inconsistency is not material and does not prevent this Board from awarding the bids.

NOW, THEREFORE BE IT RESOLVED, by the Board of Education of Euclid City School District, Cuyahoga, Ohio, that:

Section 1. Subject to the Consent of the Ohio School Facilities Commission, the Board of Education hereby (i) accepts the recommendations of the Construction Manager, Architect and Administration to award the Base Bids for the respective Bid Packages identified



Mr. Smith

Mr. Sweet

Mr. Sweet

Mrs. Van Ho

\_\_\_\_\_

CERTIFICATE

The undersigned hereby certifies that the foregoing is a true and correct copy of a resolution adopted at a meeting held on March 7, 2011, together with a true and correct extract from the minutes of said meeting to the extent pertinent to consideration and adoption of said resolution.

  
\_\_\_\_\_  
Stephen A. Vasek, Treasurer

March 7, 2011



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

June 12, 2012

Darrell Bartkowski  
EUCLID CITY SCHOOL DISTRICT  
651 E 222ND ST  
EUCLID, OH 44123-2031

**Re: Form 471 Application Number: 801252**  
**Billed Entity Number (BEN): 129493**  
**Billed Entity FCC RN: 0012663274**  
**Applicant's Form Identifier: OSFC-NETWORK**

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, \$456,816.14 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 801252 as assigned by USAC,
  - "Funding Commitment Decision Letter for Funding Year 2011," AND
  - The exact text or the decision that you are appealing.

FUNDING COMMITMENT REPORT  
Billed Entity Name: EUCLID CITY SCHOOL DISTRICT  
BEN: 129493  
Funding Year: 2011



Comment on RAL corrections: FRN(s) modified in accordance with a RAL request.

Form 471 Application Number: 801252  
Funding Request Number: 2171212  
Funding Status: Not Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 518680000887364  
SPIN: 143034681  
Service Provider Name: Zenith Systems LLC  
Contract Number: NA  
Billing Account Number: NA  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2011  
Service End Date: N/A  
Contract Award Date: 03/16/2011  
Contract Expiration Date: 06/30/2012  
Shared Worksheet Number: 1335229  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$507,573.49  
Pre-discount Amount: \$507,573.49  
Discount Percentage Approved by the USAC: 90%  
Funding Commitment Decision: \$0.00 - Contract Violation  
Funding Commitment Decision Explanation: MR1: FRN modified in accordance with a RAL request. <><><><><> MR2: The FRN was modified from \$507,573.49 to \$505,817.79 to agree with the applicant documentation. <><><><><> MR3: The Contract Award Date was changed from March 15, 2011 to March 16, 2011 to agree with the documentation provided during the review of the Form 471. <><><><><> MR4: Basic Maintenance of Internal Connections FRN was modified from non-recurring charges to recurring charges as required by FCC Rules. <><><><><> MR5: The FRN was modified from a one-time charge of \$505,817.79 to a one-time charge of \$504,062.09 and a monthly charge of \$146.31 to agree with the applicant documentation. <><><><><> MR6: The amount of the funding request was changed from a one-time charge of \$504,062.09 and a monthly charge of \$146.31 to a one-time charge of \$499,877.24 and a monthly charge of \$146.31 to remove: UPS Network Management Cards 2 for \$4,184.85. <><><><><> 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: 06/12/2012  
Wave Number: 048  
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2013  
Consultant Name:  
Consultant Number (CRN):  
Consultant Employer:



Universal Service Administrative Company

Schools and Libraries Division



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

June 12, 2012

Darrell Bartkowski  
EUCLID CITY SCHOOL DISTRICT  
651 E 222ND ST  
EUCLID, OH 44123-2031

**Re: Form 471 Application Number: 784661**  
**Billed Entity Number (BEN): 129493**  
**Billed Entity FCC RN: 0012663274**  
**Applicant's Form Identifier: OSFC-CABL**

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, \$867,412.10 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 784661 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](http://www.usac.org/sl)

FUNDING COMMITMENT REPORT  
Billed Entity Name: EUCLID CITY SCHOOL DISTRICT  
BEN: 129493  
Funding Year: 2011



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

Form 471 Application Number: 784661  
Funding Request Number: 2169476  
Funding Status: Not Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 518680000887364  
SPIN: 143034681  
Service Provider Name: Zenith Systems LLC  
Contract Number: NA  
Billing Account Number: NA  
Multiple Billing Account Numbers: N  
Service Start Date: 07/01/2011  
Service End Date: N/A  
Contract Award Date: 03/16/2011  
Contract Expiration Date: 06/30/2012  
Shared Worksheet Number: 1298334  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$963,791.22  
Pre-discount Amount: \$963,791.22  
Discount Percentage Approved by the USAC: 90%  
Funding Commitment Decision: \$0.00 - Contract Violation  
Funding Commitment Decision Explanation: MR1: The Contract Award Date was changed from March 15, 2011 to March 16, 2011 to agree with the documentation provided during the review of the Form 471. <><><><><> MR2: The amount of the funding request was changed from \$963,791.22 to \$963,549.73 to remove: IP Surveillance Recorder charges of \$241.49. <><><><><> 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: 06/12/2012  
Wave Number: 048  
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2013  
Consultant Name:  
Consultant Number (CRN):  
Consultant Employer: