

Immaculate Conception School

23 MANALAPAN ROAD, SPOTSWOOD, NJ 08884
(732) 251-3090 • Fax (732) 251-8270

November 5, 2012

Federal Communications Commission
Office of the Secretary
445 12th street SW
Washington, DC 20554

Docket No. 02-6

Dear Secretary:

I am writing today to appeal the decision of USAC regarding our change of providers for our telephone service. We submitted an Operational SPIN Change Request (see attached) for the fiscal year 2012-2013 on August 1, 2012. We decided to change our telephone provider from Broadview Network Holdings to Comcast Business Communications purely on the basis of a substantial savings on a monthly basis for this service (approx. \$350.00 per month). This was not done by competitive bidding, but rather through an informal request for pricing from 3 different telephone providers (Broadview, Comcast and Verizon). Only Broadview and Comcast responded to this request. After due consideration of their responses, it was decided that Comcast offered us the best services at the lowest cost.

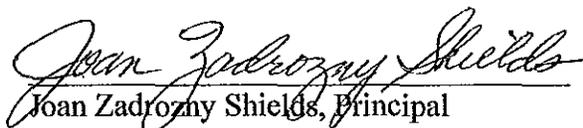
In a letter dated October 31, 2012, USAC has denied this request for a SPIN change. When I called their Customer Service department, I was informed that due to recent FCC rule changes, an Operational SPIN change for the above-named reason was denied. Of course, whether or not this request was denied, the new provider of telephone services to our school is Comcast Business Communications. This change not only saves the school money over the entire year, it will save USAC money in reimbursement costs to us for this service as well.

I am requesting a favorable decision in this matter, based on the cost savings to both the school and USAC. I request that you inform USAC that you will allow this change of providers on the basis of the money saved to both the school and USAC.

I hope that you will consider this request and provide a favorable answer to USAC and myself as soon as possible

Thank you for your consideration in this matter.

Sincerely yours,



Joan Zadrozny Shields, Principal
Immaculate Conception School
23 Manalapan Road
Spotswood, NJ 08884
jshields@icspotswood.com



Schools and Libraries Division

Administrator's Decision on SPIN Change Request

Date: October 31, 2012

Re: Applicant Name: IMMACULATE CONCEPTION SCHOOL
Billed Entity Number: 9773
Form 471 Application Number: 832766
Funding Request Number: 2264197
Your Correspondence Dated: August 1, 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 SPIN Change Request for the FRN 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 USAC or the Federal Communications Commission (FCC). If your SPIN Change request included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request No. (FRN): 2264197
Original Service Provider: Broadview Networks Holdings, Inc
Original SPIN: 143008617
New Service Provider: Comcast Business Communications
New SPIN: 143003990
Original Commitment Amount: \$3,889.10
Disbursement Amount: \$0
CAP Remaining:
A Form 486 has been filed for this FRN: No
This FRN includes Non-Recurring Services: No

Decision: Denied

Explanation:

You requested a SPIN Change for FRN 2264197 from SPIN 143008617 to 143003990. However, your request is denied because you did not have a legitimate reason for a SPIN change to SPIN 143003990.

For specific, detailed instructions and any additional information on how to submit a SPIN Change Request, please visit USAC's web site at <http://www.usac.org/sl/about/changes-corrections/spin-change-guidance.aspx>

Please note that, if your initial SPIN change request was received prior to the fund year's Invoice

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ07054-0685
Visit us online at: www.usac.org/sl

Deadline, your opportunity to complete the SPIN change in the future is secure. Further attempts to complete the SPIN change will be accepted and Invoice Deadline Extensions will be given upon completion of the SPIN change.

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

In your letter of appeal:

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.

State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:

appellant name,
applicant or service provider name, if different than appellant,
applicant BEN and service provider SPIN,
Form 471 application number as assigned by USAC,
Funding Request Number(s) (FRNs) you are appealing if provided in the letter,
Administrator's Decision on SPIN Change Request, AND
the exact text of the decision that you are appealing.

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.

If you are an applicant, please provide a copy of your appeal to the service provider(s) affected by the USAC's decision. If you are a service provider, please provide a copy of your appeal to the applicant(s) affected by the USAC's decision.

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 us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us 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

For more information on submitting an appeal to USAC, please see the "Appeals Procedure" posted on our website.

While we encourage you to resolve your appeal with USAC first, you have the option of filing an appeal directly with the Federal Communications Commission (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 on 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.

Thank you for your continued patience and cooperation during this process.

Schools and Libraries Division
Universal Service Administrative Company

CC:

Operational SPIN Change Request

*Immaculate Conception School
23 Manalapan Road
Spotswood, New Jersey 08884
(732) 251-3090*

Info #	Requested Information	Answer
1	Billed Entity Number	9773
2	Applicant Name	<i>Immaculate Conception School</i>
3	Funding Request Number (FRN)	2264197
4	FCC Form 471 Application Number	832766
5	Applicant Contact	<i>Kathy Gately</i>
6	Applicant Phone	732-251-3090
7	Applicant EMAIL Address	<u><i>kgately@icspotswood.com</i></u>
8	Original SPIN	143008617
9	Original Service Provider	<i>Broadview Network Holdings</i>
10	Original Service Provider Contact	<i>variable</i>
11	Original Service Provider Phone	800-276-2384
12	Original Service Provider EMAIL Address	<i>unknown</i>
13	New SPIN	143003990
14	New Service Provider	<i>Comcast Business Communications</i>
15	New Service Provider Contact	<i>variable</i>
16	New Service Provider Phone	800-391-3000
17	New Service Provider EMAIL Address	<u><i>www.businesshelp.comcast.com</i></u>
18	Has Original Service provider supplied any services under this funding request	<i>No</i>
18a	Monthly pre-discount amount for original service provider	\$810.23
18b	Monthly pre-discount amount for new service provider	\$441.25
18c	Effective Date of Change	7/1/2012
18d	Last Day of Service For New Service Provider	6/30/2013
19-1	Are all SPIN changes requested in this letter allowed under all applicable state and local government rules?	<i>Yes</i>
19-2	Are the SPIN changes allowable under the terms of the contract, if any, between the applicant and its original service provider?	<i>Yes</i>
19-3	Have you notified you original service provider of your intent to change service providers?	<i>Yes</i>
20	Detailed explanation of the need for the change	<i>The new contract with Comcast is <u>much</u> more affordable than the one we had with Broadview.</i>
20-1	Statement of bid/RFP's received.	<i>No formal bidding process was used. An informal request for prices was sent to Broadview, Comcast and Verizon. Only Broadview and Comcast responded.</i>

*EMMAILED
8/1/12
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