



1101 Stadium Drive, Ada, OK 74820  
p. 580-332-1444 f. 580-332-2532  
info@kelloggllc.com  
www.kelloggllc.com

December 27, 2012

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Dear Federal Communications Commission:

Please find the enclosed Letter of Appeal related to removal of ineligible costs from a funding request for E-Rate support.

Respectfully submitted,

A handwritten signature in black ink that reads "Deborah J. Sovereign". The signature is written in a cursive style with a long, sweeping tail on the letter "n".

Deborah Sovereign, Consultant

Enclosures

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Appeal

Deer Creek Independent School Dist  
Form 471 Application #873159  
Funding Request Number: 2382660

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CC Docket No. 02-6

APPEAL

**DEER CREEK INDEPENDENT SCHOOL DIST  
EDMOND, OKLAHOMA**

December 27, 2012

Deborah Sovereign  
Jane Kellogg

Kellogg & Sovereign Consulting, LLC  
1101 Stadium Drive  
Ada, OK 74820  
(580) 332-1444  
(580) 332-2532 (facsimile)  
Email: dsovereign@kelloggllc.com

Deer Creek Independent School Dist, Edmond, Oklahoma (“Deer Creek ISD”) hereby submits an appeal to the Commission regarding the Universal Service Administrative Company (USAC)’s Administrator’s Decision to deny funding on Funding Request Number 2382660.

Reason for Denial – USAC – Dated December 14, 2012

“USAC has given you an opportunity to provide the additional documentation to enable USAC to appropriately revise your funding request and remove the costs associated with ineligible products and you failed to do so. Accordingly, your funding request was Denied. In your appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.”

The Program Integrity Assurance (PIA) Review for Deer Creek ISD took place during the transition between technology directors. Tony Brancich filed the application and answered PIA questions in May, 2012. The new technology director, Mandy Godfrey filed an appeal with USAC when she received the denial of funding on their request for E-rate discounts on their telephone services, funding request number 2382660.

Reason for Denial - Funding Commitment Decision Letter (“FCDL”) dated 10/09/2012:

“Applicant has not provided sufficient documentation needed to support the funding request of \$4,123.78”

The reason for denial as listed on the FCDL did not mention anything about removal of ineligible items. The denial stated that insufficient documentation was the problem. Thus, Ms. Godfrey submitted an appeal letter to USAC with the supporting documentation that had been provided by the service provider along with copies of bills to substantiate the request. She was not able to ascertain exactly why there was a problem with the funding request since this information had previously been provided in the Item 21 attachment pages and previous correspondence from Mr. Brancich with the PIA reviewer.

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Letter of Appeal

Deer Creek Independent School Dist, Form 471 Application Number 873159, FRN 2382660  
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444

Once the applicant received the USAC appeal decision that discusses removal of ineligible items, they were able to determine the actual problem which appears to be a misunderstanding between the applicant and PIA Reviewer.

The ineligible items issue was addressed in email correspondence dated May 9, 2012 between Mr. Brancich and the PIA reviewer, William Kanyuck.

Mr. Kanyuck sent the following request regarding FRN 2382660:

Question 1.

Your Online Item 21 Attachment lists surcharges at \$261.76. What type of surcharges, please list.

(Note: Question 2 was related to FRN 2383207 so not applicable to this appeal)

Question 3.

Based on documentation that you have provided, we have determined that FRN 2382660 includes ineligible items. According to program rules, USAC is unable to fund ineligible products or services. The charges associated with ineligible items must be identified and removed.

Listed below are the ineligible items and their associated costs:

5 Additional Listings \$30.00

Please confirm that you agree with the cost allocation and the ineligible item(s) should be removed from the FRN. \_\_\_\_\_ Yes or  
\_\_\_\_\_ No

Mr. Brancich submitted the following response:

Question 1: FRN 2382660

I believe these surcharges were calculated by our vendor based on overage averages from last year's CRIS report. I would accept eliminating these from our request for the purpose of expediting the other clearly-eligible items.

Question 3: FRN 2382660

I agree that the ineligible items should be removed.

Based on Mr. Brancich's response, the following adjustments should be made:

- Question 1 – remove \$261.76/month from the pre-discount amount for the surcharges.
- Question 3- remove \$30.00/month from the pre-discount amount for the additional listings.

The following table provides the details of the request and adjustments per the applicant's request:

	Monthly	Annual
Original Requested Items (Pre-Discount Amount) as detailed on Item21 Attachments:		
25 New business lines	425.00	5,100.00
5 additional listings	30.00	360.00
36 station centrex system	1,844.50	22,134.00
Three PRIs	1,460.52	17,526.24
6 Existing business lines	102.00	1,224.00
Surcharges	261.76	3,141.12
<b>Total Original Pre-Discount</b>	<b>4,123.78</b>	<b>49,485.36</b>
Discount		40%
Original Request		19,794.14
Remove ineligible items:		
5 additional listings	(30.00)	(360.00)
Surcharges	(261.76)	(3,141.12)
<b>Adjusted Pre-Discount Amount</b>	<b>3,832.02</b>	<b>45,984.24</b>
Discount		40%
<b>Adjusted Request</b>		<b>18,393.70</b>

The only reasons we could tell that the reviewer did not remove the ineligible items per the applicant's request was that the applicant did not provide a detail of the surcharges as requested by the reviewer nor did the applicant make a check mark in the box as shown in the question # 3 posed by the reviewer. The applicant didn't provide a detail listing of the surcharges since the detail was no longer necessary as the applicant agreed to remove them from the request. Also, the applicant didn't make a check mark

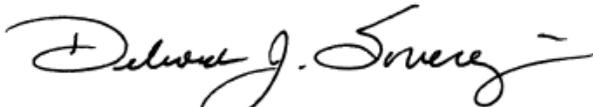
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Letter of Appeal

in the box in the reviewer's Question # 3 because the applicant stated using words in their response to request removal of the ineligible additional listings.

Since the applicant timely responded to the reviewer's request to remove the ineligible items and sufficient documentation was provided in response to the reviewers' requests, we respectfully request that the funding requests be considered for approval as originally submitted less the ineligible items: surcharges of \$261.76/month (pre-discount) and the additional listings of \$30.00/month (pre-discount) for a total pre-discount annual amount of \$45,984.24. The requested annual committed amount as adjusted is \$18,393.70.

Respectfully Submitted,



Deborah J. Sovereign, Consultant

**ATTACHMENTS**

1. USAC Administrator's Decision on Appeal – December 14, 2012
2. USAC Appeal submitted by applicant – November 2, 2012
3. PIA correspondence – May 9, 2012
4. Item 21 Attachment Pages – FRN 2382660
5. Letter of Agency

# **ATTACHMENT 1**

**USAC Appeal Decision – Denial  
Form 471 # 873159  
FRN 2382660**

**December 14, 2012**

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Letter of Appeal

Deer Creek Independent School Dist, Form 471 Application Number 873159, FRN 2382660  
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444



**Administrator's Decision on Appeal – Funding Year 2012-2013**

December 14, 2012

Mandy Godfrey  
Deer Creek Independent School Dist  
20825 N. Macarthur  
Edmond, OK 73003

Re: Applicant Name: DEER CREEK INDEPENDENT SCHOOL  
DIST  
Billed Entity Number: 139733  
Form 471 Application Number: 873159  
Funding Request Number(s): 2382660  
Your Correspondence Dated: November 02, 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 2012 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): 2382660  
Decision on Appeal: **Denied**  
Explanation:

- USAC has given you an opportunity to provide the additional documentation to enable USAC to appropriately revise your funding request and remove the costs associated with ineligible products and you failed to do so. Accordingly, your funding request was Denied. In your appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.
- FCC rules provide that funding may be approved only for eligible products and services. *See* 47 C.F.R. secs. 54.502. The USAC website contains a list of eligible products and services. *See* USAC website, [www.usac.org/sl](http://www.usac.org/sl), Eligible Services List. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding

request must be denied, otherwise the funding request will be reduced accordingly. *See* 47 C.F.R. sec. 54.504(b). The FCC's Aiken County Public Schools Order directed USAC to permit the applicant 15 calendar days from the date of receipt of notice in writing by USAC to revise its funding request to remove the ineligible services or allow the applicant to provide additional documentation to show why the services are eligible. *See* Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools Aiken, SC, et al., Schools and Libraries Universal Service Support Mechanism, File No. SLD-397612, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8735, FCC 07-61 para. 11 (May 8, 2007).

- USAC Schools and Libraries Division oversees the administration of the E-rate Program and has the authority to make decisions concerning the administration of the application process, including activities to ensure compliance with Federal Communications Commission rules and regulations. *See* 47 C.F.R. sec. 54.705(a)(1)(iii). To conduct these reviews, USAC has put in place administrative measures to ensure the prompt resolution of applications. If applicants do not respond within the designated time period, USAC reviews the application based on the information before it. *See* Request for Review by Marshall County School District, Federal-State Joint Board on Universal Service, Changes to the Board of Directors of the National Exchange Carrier Association, Inc., CC Docket Nos. 96-45 and 97-21, 18 FCC Rcd 4520, 4522, Order, DA 03-764 para. 6 (rel. Mar. 13, 2003). Typically, applicants are required to respond to USAC's requests for additional information necessary to complete their application within 15 days of being contacted. *See* Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, et al., Schools and Libraries Universal Service Mechanism, CC Docket No. 02-6, Order, 21 FCC Rcd 5316-5317, FCC 06-54 para. 23 (rel. May 19, 2006). *See also* SLD section of the USAC website, Reference Area, "Deadline for Information Requests," [www.usac.org/sl](http://www.usac.org/sl). For those instances where USAC contacts the applicant in reference to a Selective Review Information Request, the applicant is provided 30 days to comply with the request. This procedure is necessary to prevent undue delays during the application review process.

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.

# **ATTACHMENT 2**

**Appeal Submitted to USAC  
November 2, 2012**

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Letter of Appeal

Deer Creek Independent School Dist, Form 471 Application Number 873159, FRN 2382660

Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444



# DEER CREEK SCHOOL DISTRICT

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*Mandy Godfrey, Technology Director*  
*godfrey@deercreek.k12.ok.us*

November 2, 2012

Universal Service Administration Company  
Schools and Libraries Division

Re: **APPEAL**  
Form 471 Application Number: 873159  
Billed Entity Number (BEN): 139733  
Billed Entity FCC RN: 0012002499  
Applicant's Form Identifier: 2012-2013 471

This letter is an appeal to the funding denial included in the Funding Commitment Decision Letter for Funding Year 2012 for Deer Creek Schools BEN #139733 in regards to Telecommunications Service with Southwestern Bell Telephone Company SPIN # 143004662 for Form 471 Application Number 873159.

“Funding Commitment Decision Explanation: Applicant has not provided sufficient documentation needed to support the funding request of \$4,123.78.”

We have submitted the exact documentation requested by our reviewer, Mr. Bill Kanyuck. In his last request submitted to us on 9/18/2012, he asks for the following information:

I:  
Based on our review of your Funding Year 2012 FCC Form 471 application 873159, on FRN 2382660, you requested a total of \$4,123.78. The documentation you submitted only supports \$1,890.17. Please provide vendor documentation to support the total amount requested on the FRN. If you do not have vendor documentation that supports the total amount requested, please explain the difference between the amount you requested on the FRN and the amount shown on the documentation you originally provided.

Any documentation provided should clearly identify any ineligible charges that were cost allocated out of your request. If you are requesting additional dollars to accommodate expected growth or increased usage, please indicate how you estimated this amount. Please also provide any relevant documentation that you used when determining the estimate for expected growth or increased usage.

Please keep in mind that your supporting documentation should be the documentation or data used to prepare your FCC Form 471 application. Examples of supporting documentation are contracts, vendor quotes, vendor bills, invoices, etc.”

We responded on 9/21/2012 with vendor quotes supporting our request as per Mr. Kanyuck's request. We asked him to clarify if this was in fact appropriate documentation to which we did not receive a response. I am attaching the vendor quotes used as supporting documentation for this application. I am also attaching current vendor bills/invoices that support our request for funding.

Attached:     Basic 405-348-6101.xlsx  
              Basic Yr 15 405-348-6100.xlsx  
              Invoice 405-348-6100 409  
              Invoice 405-348-6101 501

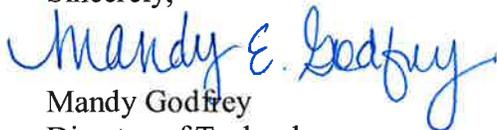
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The appropriate contact information is as follows:

Mandy Godfrey  
20825 N. MacArthur Blvd.  
Edmond, OK 73003  
Phone: 405-348-6100 x1161  
Fax: 405-348-3049  
[godfrey@deercreek.k12.ok.us](mailto:godfrey@deercreek.k12.ok.us)

Thank you for your concern regarding this matter. Please advise me what steps we can take to ensure that we have provided you with the appropriate information to fund our telecommunications services.

Sincerely,



Mandy Godfrey  
Director of Technology  
Deer Creek Schools



at&t

**ERATE**  
Year 15 - 2012

**Telecommunications:**  
**Basic Service**

Jan Cooley  
Sales Mgmt / Support  
405 319-6003 W  
405 291-1163 F  
[jc563d@att.com](mailto:jc563d@att.com)

SPIN #: 143004662

405 348-  
6101

Quote for

DATE OF PROPOSAL 3-8-12jc

**Deer Creek Indep Sch**

	Description	Qty	Total Monthly (recurring)	Total Install (one-time)	Total Annual (12 mos. recurring)
<b>Current</b>	Buiness lines	6	\$102.00	\$0.00	\$1,224.00
	Plexar (13 lines, 36 stations)		\$1,291.70	\$0.00	\$15,492.00
	Existing State Contract 450 Expires 9-29-15				
	Circuit	16	\$552.80	\$0.00	\$6,633.60
	<b>Approximate Surcharges</b>		\$261.76	\$0.00	\$3,261.12
<b>Proposed</b>	Buiness lines	6	\$102.00	\$0.00	\$1,224.00
	Plexar (13 lines, 36 stations)		\$1,291.70	\$0.00	\$15,492.00
	Existing State Contract 450 Expires 9-29-15				
	Circuit	16	\$552.80	\$0.00	\$6,633.60
	<b>Approximate Surcharges</b>		\$261.76	\$0.00	\$3,261.12

This quote does not constitute a binding contract and is valid until the expiration date stated above. All quoted charges are estimated only, they are not binding and are subject to change at any time without notice. All rates are given without all local, state and federal fees, taxes and charges. Installation rates may change depending on the work actually performed. All rates are given in good faith and are believed to be correct.



**ERATE**  
Year 15 - 2012

Sales A

**Telecommunications:**  
**Basic Service**

at&t

SPIN #: **143004662**

**405 348-6100**

Quote for

DATE OF PROPOSAL

**Deer Creek Schools**

	Description	Qty	Total Monthly (recurring)	Total Install (one-time)	Total Annual (12 mos. recurring)
<b>Current</b>	ISDN PRI (Smart Trunks) W/ DID's Existing State Contract 450 Expires 9-29-15	2	\$970.58	\$0.00	\$11,646.96
	Additional Listings	5	\$30.00	\$0.00	\$360.00
	Approximate Surcharges		\$149.82	\$0.00	\$1,797.84
<b>Proposed</b>	ISDN PRI (Smart Trunks) W/ DID's Existing State Contract 450 Expires 9-29-15	2	\$970.58	\$0.00	\$11,646.96
	NEW ISDN PRI	1	\$480.64	\$0.00	\$5,767.68
	NEW Business lines State Contract 450 Pricing Contract Required	25	\$425.00	\$0.00	\$5,100.00
	Additional Listings	5	\$30.00	\$0.00	\$360.00

This quote does not constitute a binding contract and is valid until the expiration date stated above. All quoted charges are estimated only, they are not binding and are subject to change at any time without notice. All rates are given without all local, state and federal fees, taxes and charges. Installation rates may change depending on the work actually performed. All rates are given in good faith and are believed to be correct.

DEER CREEK SCHOOLS  
SUPERINTENDENTS OFFICE  
20825 N MACARTHUR BLVD  
EDMOND OK 73012 - 9342

Page 1 of 4  
Account Number 405 348-6101 501 4  
Billing Date Oct 27, 2012

Web Site att.com



## Monthly Statement

### Bill-At-A-Glance

Previous Bill	4,000.20
Payment - Thank You	4,000.20CB
Adjustments	.00
Balance	.00
Current Charges	1,990.68
<b>Total Amount Due</b>	<b>\$1,990.68</b>
Amount Due in Full By	Nov 19, 2012

### Billing Summary

Need Billing Questions? Visit <a href="http://att.com/billing">att.com/billing</a>	Page	
<b>Plans and Services</b>	1	1,990.68
1 800 559-7928		
Payment Arrangements:		
1 800 924-1743		
Service Changes:		
1 800 499-7928		
Repair Services:		
1 800 286-8313		
<b>Total Current Charges</b>		<b>1,990.68</b>

### Detail of Payments and Adjustments

Item No.	Date	Description	Adjustments	Payments
1.	9-28	Payment		2,011.44
2.	10-12	Payment		1,988.76
Totals				4,000.20

### Plans and Services

#### Monthly Service - Oct 27 thru Nov 26

Charges for 405 348-6101		
3.	Monthly Charges	785.55
4.	Plexar II-Basic Station - ICB	4.82
5.	Rural Mi. Chrg-2nd Zone - ICB	9.38
Total Charges for 405 348-6101		799.75
Charges for 405 348-3049		
6.	Monthly Charges	11.75
7.	Plexar II-Basic Station - ICB	4.82
8.	Rural Mi. Chrg-2nd Zone - ICB	9.38
Total Charges for 405 348-3049		25.95
Charges for 405 348-5721		
9.	Monthly Charges	11.75
10.	Plexar II-Basic Station - ICB	4.82
11.	Rural Mi. Chrg-2nd Zone - ICB	9.38
Total Charges for 405 348-5721		25.95
Charges for 405 348-9619		
12.	Monthly Charges	11.75
13.	Plexar II-Basic Station - ICB	4.82
14.	Rural Mi. Chrg-2nd Zone - ICB	9.38
Total Charges for 405 348-9619		25.95
Charges for 405 348-9628		
15.	Monthly Charges	11.75
16.	Plexar II-Basic Station - ICB	4.82
17.	Rural Mi. Chrg-2nd Zone - ICB	9.38
Total Charges for 405 348-9628		25.95
Charges for 405 359-1819		
18.	Monthly Charges	11.75
19.	Plexar II-Basic Station - ICB	4.82
20.	Rural Mi. Chrg-2nd Zone - ICB	9.38
Total Charges for 405 359-1819		25.95
Charges for 405 359-3150		
21.	Monthly Charges	11.75
22.	Plexar II-Basic Station - ICB	4.82

### News You Can Use Summary

- PREVENT DISCONNECT
  - LONG DIST. PROVIDERS
  - UNIVERSAL SVC FEE
- For "News You Can Use" for additional information

Local Services provided by AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma, or AT&T Texas based upon the service address location.

GO GREEN - Enroll in paperless billing.

Printed on Recycled Paper

Return bottom portion with your check in the enclosed envelope.



**Plans and Services**

**Monthly Service - Oct 27 thru Nov 26 - Continued**

1. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3150</b>	<b>25.95</b>
<b>Charges for 405 359-3151</b>	
2. Monthly Charges	11.75
3. Plexar II-Basic Station - ICB	4.82
4. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3151</b>	<b>25.95</b>
<b>Charges for 405 359-3152</b>	
5. Monthly Charges	11.75
6. Plexar II-Basic Station - ICB	4.82
7. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3152</b>	<b>25.95</b>
<b>Charges for 405 359-3153</b>	
8. Monthly Charges	11.75
9. Plexar II-Basic Station - ICB	4.82
10. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3153</b>	<b>25.95</b>
<b>Charges for 405 359-3154</b>	
11. Monthly Charges	11.75
12. Plexar II-Basic Station - ICB	4.82
13. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3154</b>	<b>25.95</b>
<b>Charges for 405 359-3155</b>	
14. Monthly Charges	11.75
15. Plexar II-Basic Station - ICB	4.82
16. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3155</b>	<b>25.95</b>
<b>Charges for 405 359-3157</b>	
17. Basic Local Service - Business	17.00
<b>Charges for 405 359-3162</b>	
18. Monthly Charges	11.75
19. Plexar II-Basic Station - ICB	4.82
20. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3162</b>	<b>25.95</b>
<b>Charges for 405 359-3163</b>	
21. Monthly Charges	11.75
22. Plexar II-Basic Station - ICB	4.82
23. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3163</b>	<b>25.95</b>
<b>Charges for 405 359-3164</b>	
24. Monthly Charges	11.75
25. Plexar II-Basic Station - ICB	4.82
26. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3164</b>	<b>25.95</b>
<b>Charges for 405 359-3166</b>	
27. Monthly Charges	11.75
28. Plexar II-Basic Station - ICB	4.82

**Monthly Service - Oct 27 thru Nov 26 - Continued**

29. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3166</b>	<b>25.95</b>
<b>Charges for 405 359-3169</b>	
30. Monthly Charges	11.75
31. Plexar II-Basic Station - ICB	4.82
32. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3169</b>	<b>25.95</b>
<b>Charges for 405 359-3171</b>	
33. Monthly Charges	11.75
34. Plexar II-Basic Station - ICB	4.82
35. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3171</b>	<b>25.95</b>
<b>Charges for 405 359-3172</b>	
36. Monthly Charges	11.75
37. Plexar II-Basic Station - ICB	4.82
38. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3172</b>	<b>25.95</b>
<b>Charges for 405 359-3173</b>	
39. Monthly Charges	11.75
40. Plexar II-Basic Station - ICB	4.82
41. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3173</b>	<b>25.95</b>
<b>Charges for 405 359-3174</b>	
42. Monthly Charges	11.75
43. Plexar II-Basic Station - ICB	4.82
44. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3174</b>	<b>25.95</b>
<b>Charges for 405 359-3175</b>	
45. Monthly Charges	11.75
46. Plexar II-Basic Station - ICB	4.82
47. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3175</b>	<b>25.95</b>
<b>Charges for 405 359-3176</b>	
48. Monthly Charges	11.75
49. Plexar II-Basic Station - ICB	4.82
50. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3176</b>	<b>25.95</b>
<b>Charges for 405 359-3177</b>	
51. Monthly Charges	11.75
52. Plexar II-Basic Station - ICB	4.82
53. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3177</b>	<b>25.95</b>
<b>Charges for 405 359-3178</b>	
54. Monthly Charges	11.75
55. Plexar II-Basic Station - ICB	4.82
56. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3178</b>	<b>25.95</b>





**Plans and Services**

**Monthly Service - Oct 27 thru Nov 26 - Continued**

<b>Charges for 405 359-3179</b>	
1. Monthly Charges	11.75
2. Plexar II-Basic Station - ICB	4.82
3. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3179</b>	<b>25.95</b>
<b>Charges for 405 359-3180</b>	
4. Monthly Charges	11.75
5. Plexar II-Basic Station - ICB	4.82
6. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3180</b>	<b>25.95</b>
<b>Charges for 405 359-3181</b>	
7. Monthly Charges	11.75
8. Plexar II-Basic Station - ICB	4.82
9. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3181</b>	<b>25.95</b>
<b>Charges for 405 359-3189</b>	
10. Monthly Charges	11.75
11. Plexar II-Basic Station - ICB	4.82
12. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3189</b>	<b>25.95</b>
<b>Charges for 405 359-3190</b>	
13. Monthly Charges	11.75
14. Plexar II-Basic Station - ICB	4.82
15. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3190</b>	<b>25.95</b>
<b>Charges for 405 359-3191</b>	
16. Monthly Charges	11.75
17. Plexar II-Basic Station - ICB	4.82
18. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3191</b>	<b>25.95</b>
<b>Charges for 405 359-3196</b>	
19. Monthly Charges	11.75
20. Plexar II-Basic Station - ICB	4.82
21. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3196</b>	<b>25.95</b>
<b>Charges for 405 359-3197</b>	
22. Monthly Charges	11.75
23. Plexar II-Basic Station - ICB	4.82
24. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3197</b>	<b>25.95</b>
<b>Charges for 405 359-3198</b>	
25. Monthly Charges	11.75
26. Plexar II-Basic Station - ICB	4.82
27. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3198</b>	<b>25.95</b>
<b>Charges for 405 359-3199</b>	
28. Monthly Charges	11.75
Plexar II-Basic Station - ICB	4.82

**Monthly Service - Oct 27 thru Nov 26 - Continued**

30. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 359-3199</b>	<b>25.95</b>
<b>Charges for 405 844-1051</b>	
31. Basic Local Service - Business	17.00
<b>Charges for 405 844-1084</b>	
32. Basic Local Service - Business	17.00
<b>Charges for 405 844-1100</b>	
33. Basic Local Service - Business	17.00
<b>Charges for 405 844-1832</b>	
34. Basic Local Service - Business	17.00
<b>Charges for 405 844-1844</b>	
35. Monthly Charges	11.75
36. Plexar II-Basic Station - ICB	4.82
37. Rural Mi. Chrg-2nd Zone - ICB	9.38
<b>Total Charges for 405 844-1844</b>	<b>25.95</b>
<b>Charges for 405 844-1956</b>	
38. Basic Local Service - Business	17.00
<b>Total Monthly Service</b>	<b>1,810.00</b>

**Additions and Changes to Service**

This section of your bill reflects charges and credits resulting from account activity.

Item	Quantity	Monthly Rate	Amount Billed
<b>Activity on Oct 1, 2012</b>			
(Monthly Charges are Prorated from Oct 1, 2012 through Oct 26, 2012)			
39. Federal Universal Service Fee	5		.04
40. Federal Universal Service Fee	4		.03
41. Federal Universal Service Fee	4		.03
42. Federal Universal Service Fee	3		.03
43. Federal Universal Service Fee	9		.08
44. Federal Universal Service Fee	4		.03
45. Federal Universal Service Fee	3		.03
46. Federal Universal Service Fee	4		.03
47. Federal Universal Service Fee	1		.10
48. Federal Universal Service Fee	1		.10
49. Federal Universal Service Fee	1		.10
50. Federal Universal Service Fee	1		.10
51. Federal Universal Service Fee	1		.10
52. Federal Universal Service Fee	1		.10
<b>Total Additions and Changes to Service</b>			<b>.90</b>

**Surcharges and Other Fees**

53. Federal Subscriber Line Charge	230.58
54. Federal Subscriber Line Credit	126.27CR
55. 911 Fee	6.90
56. Federal Universal Service Fee	11.04
57. Other Surcharges and Fees	3.84
58. OK Universal Service Fee	24.70
<b>Total Surcharges and Other Fees</b>	<b>150.79</b>



DEER CREEK SCHOOLS  
 SUPERINTENDENTS OFFICE  
 20825 N MACARTHUR BLVD  
 EDMOND OK 73012 - 9342

Page 4 of 4  
 Account Number 405 348-6101 501 4  
 Billing Date Oct 27, 2012

**Plans and Services**

Taxes	
1. Federal	28.99
2. State and Local	.00
<b>Total Taxes</b>	<b>28.99</b>

**Total Plans and Services 1,990.68**

**News You Can Use**

**PREVENT DISCONNECT**  
 Thank you for being a valued customer. Please be aware that all charges must be paid each month to keep your account current and prevent collection activities. We are required to inform you that certain charges contained in the State tariff, associated taxes, fees and surcharges which include but are not limited to: basic local service, intra-state long distance calls, as well as call waiting, call forwarding and other call management type services **MUST** be paid in order to prevent interruption of basic local service. These charges are already included in the Total Amount Due and are \$1990.68. Also, neglecting to pay for other charges such as voice mail, InLine®, wireless, inter-state long distance, and Internet may result in these services being interrupted.

**LONG DIST PROVIDERS**  
 Our records indicate that you have selected Hi-Plains NTS or a company that resells their services as your primary local toll carrier and Hi-Plains NTS or a company that resells their services as your primary long distance carrier. Please contact us if this does not agree with your records.

**UNIVERSAL SVC FEE**  
 Effective 10/1/2012, the Federal Universal Service Fee has increased. This fee supports telecommunication needs of low-income households, consumers living in high-cost areas, schools, libraries and rural hospitals. Your current bill reflects the change. For more information, please contact an AT&T Service Representative at the phone number listed on the front of your bill.

**Terms and Conditions**

**LATE PAYMENT INFORMATION**  
 Please contact the provider which has billed any charges you question or dispute prior to your bill due date. Payments for charges due that are not received prior to your next bill date are subject to a 1.500% late payment charge.  
 For a complete listing of Terms and Conditions, please refer to:  
 - The inside of the AT&T White Pages directory, or  
 - Visit us on the web at [att.com/terms](http://att.com/terms)





DEER CREEK SCHOOLS  
 SUPERINTENDENTS OFFICE  
 20825 N MACARTHUR BLVD  
 EDMOND OK 73012 - 9342

Page 1 of 3  
 Account Number 405348-6100 409 1  
 Billing Date Oct 27, 2012  
 Web Site att.com

**Bill-At-A-Glance**

Previous Bill	5,358.87
Payment - Thank You!	5,358.87CR
Adjustments	.00
Balance	.00
Current Charges	1,853.30
<b>Total Amount Due</b>	<b>\$1,853.30</b>
Amount Due in Full By	Nov 19, 2012

**Detail of Payments and Adjustments**

Item No.	Date	Description	Adjustments	Payments
1.	9-28	Payment		3,428.46
2.	10-12	Payment		1,929.41
<b>Totals</b>				<b>5,358.87</b>

**Plans and Services**

**Monthly Service - Oct 27 thru Nov 26**

<b>Charges for 405 348-6100</b>	
3. Monthly Charges	44.50
4. Calling Line Identification	5.00
5. Calling Line Identification	5.00
6. Direct In Dial 1st 100 Numbers	5.00
7. Direct In Dial 1st 100 Numbers	5.00
8. Smarttrunk-Prim Rate Interface	258.40
9. Smarttrunk-Prim Rate Interface	258.40
10. Two-Way Service	7.06
11. Two-Way Service	7.06
12. Two-Way Service	7.06
13. Two-Way Service	7.06
14. Two-Way Service	7.06
15. Two-Way Service	7.06
16. Two-Way Service	7.06
17. Two-Way Service	7.06
18. Two-Way Service	7.06
19. Two-Way Service	7.06
20. Two-Way Service	7.06
21. Two-Way Service	7.06
22. Two-Way Service	7.06
23. Two-Way Service	7.06
24. Two-Way Service	7.06
25. Two-Way Service	7.06
26. Two-Way Service	7.06
27. Two-Way Service	7.06
28. Two-Way Service	7.06
29. Two-Way Service	7.06
30. Two-Way Service	7.06
31. Two-Way Service	7.06
32. Two-Way Service	7.06
33. Two-Way Service	7.06
34. Two-Way Service	7.06
35. Two-Way Service	7.06
36. Two-Way Service	7.06
37. Two-Way Service	7.06

**Billing Summary**

Billing Questions? Visit <a href="http://att.com/billing">att.com/billing</a> Page		
<b>Plans and Services</b>	1	1,853.30
1 800 559-7928		
Payment Arrangements:		
1 800 924-1743		
Service Changes:		
1 800 499-7928		
Repair Services:		
1 800 286-8313		
<b>Total Current Charges</b>		<b>1,853.30</b>

**News You Can Use Summary**

- PREVENT DISCONNECT
  - UNIVERSAL SVC FEE
  - LONG DIST. PROVIDERS
- See "News You Can Use" for additional information

Local Services provided by AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma, or AT&T Texas based upon the service address location.

GO GREEN - Enroll in paperless billing.

Return bottom portion with your check in the enclosed envelope.

Total Amount **DUE** **\$1,853.30**  
 BY Nov 19, 2012



Billing Date Oct 27, 2012

Account Number **405 348-6100 409 1**  
 Please include your account number on your check

DEER CREEK SCHOOLS  
 SUPERINTENDENTS OFFICE  
 20825 N MACARTHUR BLVD  
 EDMOND OK 73012 - 9342

Make check payable to:  
 AT&T  
 PO BOX 105414  
 ATLANTA GA 30348-5414

9707 40534861004091 200000000000 148010000000000000000185330



**Plans and Services**

**Monthly Service - Oct 27 thru Nov 26 - Continued**

1. Two-Way Service	7.06
2. Two-Way Service	7.06
3. Two-Way Service	7.06
4. Two-Way Service	7.06
5. Two-Way Service	7.06
6. Two-Way Service	7.06
7. Two-Way Service	7.06
8. Two-Way Service	7.06
9. Two-Way Service	7.06
10. Two-Way Service	7.06
11. Two-Way Service	7.06
12. Two-Way Service	7.06
13. Two-Way Service	7.06
14. Two-Way Service	7.06
15. Two-Way Service	7.06
16. Two-Way Service	7.06
17. Two-Way Service	7.06
18. Two-Way Service	7.06
Total Charges for 405 348-6100	906.06
<b>Charges for 405 216-0557</b>	
19. Monthly Charges	55.01
<b>Charges for 405 359-2292</b>	
20. Monthly Charges	55.01
<b>Charges for 405 359-2909</b>	
21. Monthly Charges	55.01
<b>Charges for 405 359-2961</b>	
22. Monthly Charges	55.01
<b>Charges for 405 844-4086</b>	
23. Monthly Charges	55.01
<b>Charges for 405 844-4092</b>	
24. Monthly Charges	55.01
<b>Charges for 405 844-4109</b>	
25. Monthly Charges	55.01
<b>Charges for 405 844-4126</b>	
26. Monthly Charges	55.01
<b>Total Monthly Service</b>	<b>1,346.14</b>

**Additions and Changes to Service**

This section of your bill reflects charges and credits resulting from a account activity.

Item No.	Description	Quantity	Monthly Rate	Amount Billed
<b>Activity on Oct 1, 2012</b>				
(Monthly Charges are Prorated from Oct 1, 2012 through Oct 26, 2012)				
27.	Federal Universal Service Fee	2		2.39
28.	Federal Universal Service Fee	1		.10
29.	Federal Universal Service Fee	1		.10
30.	Federal Universal Service Fee	1		.10

**Additions and Changes to Service - Continued**

Item No.	Description	Quantity	Monthly Rate	Amount Billed
31.	Federal Universal Service Fee	1		.10
32.	Federal Universal Service Fee	1		.10
33.	Federal Universal Service Fee	1		.10
34.	Federal Universal Service Fee	1		.10
35.	Federal Universal Service Fee	1		.10
<b>Total Additions and Changes to Service</b>				<b>3.19</b>

**Directory Assistance**

<b>Multiple Listing Requests</b>				
36.	1	Call(s) billed at \$1.89 each		1.89

**Surcharges and Other Fees**

37.	Federal Subscriber Line Charge			98.82
38.	911 Fee			62.10
39.	Federal Universal Service Fee			37.20
40.	Other Surcharges and Fees			16.20
41.	OK Universal Service Fee			70.20
42.	Federal End User Port Charge			98.02
<b>Total Surcharges and Other Fees</b>				<b>382.54</b>

**Taxes**

43.	Federal			48.26
44.	State and Local			71.28
<b>Total Taxes</b>				<b>119.54</b>

**Total Plans and Services 1,853.30**

**News You Can Use**

**PREVENT DISCONNECT**

Thank you for being a valued customer. Please be aware that all charges must be paid each month to keep your account current and prevent collection activities. We are required to inform you that certain charges contained in the State tariff, associated taxes, fees and surcharges which include but are not limited to: basic local service, intra-state long distance calls, as well as call waiting, call forwarding and other call management type services MUST be paid in order to prevent interruption of basic local service. These charges are already included in the Total Amount Due and are \$1821.05. Also, neglecting to pay for other charges such as voice mail, InLine®, wireless, inter-state long distance, and Internet may result in these services being interrupted.

**LONG DIST. PROVIDERS**

Our records indicate that you have selected Hi-Plains NTS or a company that resells their services as your primary local toll carrier and Hi-Plains NTS or a company that resells their services as your primary long distance carrier. Please contact us if this does not agree with your records.



DEER CREEK SCHOOLS  
SUPERINTENDENTS OFFICE  
20825 N MACARTHUR BLVD  
EDMOND OK 73012 - 9342

**Page** 3 of 3  
**Account Number** 405 348-6100 409 1  
**Billing Date** Oct 27, 2012

## News You Can Use

### UNIVERSAL SVC FEE

Effective 10/1/2012, the Federal Universal Service Fee has increased. This fee supports telecommunication needs of low-income households, consumers living in high-cost areas, schools, libraries and rural hospitals. Your current bill reflects the change. For more information, please contact an AT&T Service Representative at the phone number listed on the front of your bill.

## Terms and Conditions

### LATE PAYMENT INFORMATION

Please contact the provider which has billed any charges you question or dispute prior to your bill due date. Payments for charges due that are not received prior to your next bill date are subject to a 1.500% late payment charge.

For a complete listing of Terms and Conditions, please refer to:

- The inside of the AT&T White Pages directory, or
- Visit us on the web at [att.com/terms](http://att.com/terms)

# **ATTACHMENT 3**

**Email Correspondence  
May 9, 2012**

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Letter of Appeal

Deer Creek Independent School Dist, Form 471 Application Number 873159, FRN 2382660  
Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444

## Mandy Godfrey

---

**From:** Tony Brancich  
**Sent:** Wednesday, May 09, 2012 7:47 PM  
**To:** Kanyuck, William  
**Cc:** bkanyuck@sl.universalservice.org; Heather Winstead; Mandy Godfrey  
**Subject:** RE: 2012 FCC E-Rate Application #873159 for DEER CREEK INDEPENDENT SCHOOL DIST

Bill,

I have left the district but still have email access to address concerns such as these as my replacement will not be onboard until June 1. In my absence my office manager, Heather Winstead, can assist with some materials. Her email address is [winsteadh@deercreek.k12.ok.us](mailto:winsteadh@deercreek.k12.ok.us).

Question 1: FRN 2382660

I believe these surcharges were calculated by our vendor based on overage averages from last year's CRIS report. I would accept eliminating these from our request for the purpose of expediting the other clearly-eligible items.

Question 2: FRN 2383207

Ms. Winstead can provide you a copy of the contract that delineates the charges of one-time and monthly.

Question 3: FRN 2382660

I agree that the ineligible items should be removed.

Please let me know if you need any additional information.

Thanks!

Tony Brancich  
Former-IT Director, Deer Creek Public Schools

---

From: Kanyuck, William [Bill.Kanyuck@sl.universalservice.org]  
Sent: Tuesday, May 08, 2012 8:15 AM  
To: Tony Brancich  
Subject: 2012 FCC E-Rate Application #873159 for DEER CREEK INDEPENDENT SCHOOL DIST

Tony Brancich:

REVISED (with third question added)

Response Due Date: May 23, 2012

The Program Integrity Assurance (PIA) team is in the process of reviewing all Funding Year 2012 Form 471 Applications 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 2011 Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

I:

## Mandy Godfrey

---

**From:** Kanyuck, William [Bill.Kanyuck@sl.universalservice.org]  
**Sent:** Tuesday, May 08, 2012 8:16 AM  
**To:** Tony Brancich  
**Subject:** 2012 FCC E-Rate Application #873159 for DEER CREEK INDEPENDENT SCHOOL DIST

Tony Brancich:

REVISED (with third question added)

### **Response Due Date: May 23, 2012**

The Program Integrity Assurance (PIA) team is in the process of reviewing all Funding Year 2012 Form 471 Applications 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 2011 Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

**I:**  
FRN 2382660:  
Your Online Item 21 Attachment lists surcharges at \$261.76. What type of surcharges, please list.

**II:**  
FRN 2383207: Provide a copy of your Edline Web Hosting bill that will support your request of a one-time charge and monthly charge.

**III:**  
Based on documentation that you have provided, we have determined that FRN 2382660 includes ineligible items. According to program rules, USAC is unable to fund ineligible products or services. The charges associated with ineligible items must be identified and removed. Listed below are the ineligible items and their associated costs:

### **5 Additional Listings \$30.00**

Please confirm that you agree with the cost allocation and the ineligible item(s) should be removed from the FRN. \_\_\_\_\_  
Yes or \_\_\_\_\_ No

### **What to do if you disagree**

#### **Option I**

If you do not agree with the cost allocation, provide an alternative cost allocation identifying the cost(s) for the ineligible item(s). Such a cost allocation must be based on tangible criteria and reach a realistic result. For further information, see "Cost Allocation Guidelines for Products and Services" located in the Reference Area of the SLD Web site at: <http://www.usac.org/sl/applicants/step06/cost-allocation-guidelines-products-services.aspx>.

#### **Option II**

If you do not agree with our eligibility assessment of your product(s) or service(s), then you may provide third party supporting documentation dated on or before the FCC Form 471 window close date (e.g., vendor bill, contract, service agreement, etc.) to show why this product(s) or service(s) is eligible.

#### **Option III**

You may request to remove the ineligible item(s) from this FRN and place the item(s) in a new FRN. Would you like to split the FRN? \_\_\_\_\_ Yes or \_\_\_\_ No.

If yes, you must provide the information requested below:

- o Modify the current FCC Form 471 Block 5 FRN to remove the ineligible cost.
- o Complete Block 5 information for the original FRN (pre and post-split FRN).
- o Provide us with the information for the new FRN. Complete the FCC Form 471, Block 5 attached.

# **ATTACHMENT 4**

## **Item 21 Attachments**

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Letter of Appeal

Deer Creek Independent School Dist, Form 471 Application Number 873159, FRN 2382660

Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444

Application Number: **873159**

Applicant Name: DEER CREEK INDEPENDENT SCHOOL DIST

Billed Entity Number: 139733

FRN: 2382660    Funding Category: TELCOMM SERVICES  
 Submitted: 3/20/2012 4:54:27 PM    Service Provider: Southwestern Bell Telephone Company  
 SPIN: 143004662  
 Attachment Number: DialTone12-13  
 Narrative description of this Funding Request: Basic phone service for entire district  
 Further information: These lines provide POTS and digital phone service to a central phone system that distributes across the district.  
 Number of Line Items: 6

Service Type	Service Description	Number of Telecom Lines (if applicable)	25
1 of 6 POTS	new business lines for high school and middle school additional buildings		
<b>Recurring Charges</b>		<b>Non Recurring Charges</b>	
<b>Monthly Recurring Charges</b>	\$425.00	<b>One-time non-recurring charges</b>	\$0.00
<b>Less Ineligible Amount (if any)</b>	\$0.00	<b>Less Ineligible Amount (if any)</b>	\$0.00
<b>Number of Months</b>	12	<b>Eligible non-recurring charges</b>	<b>\$0.00</b>
<b>Eligible recurring charges</b>	<b>\$5,100.00</b>		
		<b>Line item TOTAL \$5100</b>	

Service Type	Service Description	Number of Telecom Lines (if applicable)	5
2 of 6 Other Telephone Service	5 Additional Listings		
<b>Recurring Charges</b>		<b>Non Recurring Charges</b>	
<b>Monthly Recurring Charges</b>	\$30.00	<b>One-time non-recurring charges</b>	\$0.00
<b>Less Ineligible Amount (if any)</b>	\$0.00	<b>Less Ineligible Amount (if any)</b>	\$0.00
<b>Number of Months</b>	12	<b>Eligible non-recurring charges</b>	<b>\$0.00</b>
<b>Eligible recurring charges</b>	<b>\$360.00</b>		
		<b>Line item TOTAL \$360</b>	

Service Type	Service Description	Number of Telecom Lines (if applicable)	36
3 of 6 Centrex	36 station system		
<b>Recurring Charges</b>		<b>Non Recurring Charges</b>	
<b>Monthly Recurring Charges</b>	\$1,844.50	<b>One-time non-recurring charges</b>	\$0.00
<b>Less Ineligible Amount (if any)</b>	\$0.00	<b>Less Ineligible Amount (if any)</b>	\$0.00
<b>Number of Months</b>	12	<b>Eligible non-recurring charges</b>	<b>\$0.00</b>
<b>Eligible recurring charges</b>	<b>\$22,134.00</b>		
		<b>Line item TOTAL \$22134</b>	

Service Type	Service Description	Number of Telecom Lines (if applicable)	69
4 of 6 DTS - ISDN-PRI	Three PRIs		
<b>Recurring Charges</b>		<b>Non Recurring Charges</b>	
<b>Monthly Recurring Charges</b>	\$1,460.52	<b>One-time non-recurring charges</b>	\$0.00
<b>Less Ineligible Amount (if any)</b>	\$0.00	<b>Less Ineligible Amount (if any)</b>	\$0.00
<b>Number of Months</b>	12	<b>Eligible non-recurring charges</b>	<b>\$0.00</b>
<b>Eligible recurring charges</b>	<b>\$17,526.24</b>		
		<b>Line item TOTAL \$17526.24</b>	

Service Type	Service Description		
5 of 6 POTS	existing business lines		
		<b>Number of Telecom Lines (if applicable)</b>	6
<b>Recurring Charges</b>		<b>Non Recurring Charges</b>	
<b>Monthly Recurring Charges</b>	\$102.00	<b>One-time non-recurring charges</b>	\$0.00
<b>Less Ineligible Amount (if any)</b>	\$0.00	<b>Less Ineligible Amount (if any)</b>	\$0.00
<b>Number of Months</b>	12		
<b>Eligible recurring charges</b>	<b>\$1,224.00</b>	<b>Eligible non-recurring charges</b>	<b>\$0.00</b>
			<b>Line item TOTAL \$1224</b>

Service Type	Service Description		
6 of 6 Other	surcharges		
		<b>Number of Telecom Lines (if applicable)</b>	42
<b>Recurring Charges</b>		<b>Non Recurring Charges</b>	
<b>Monthly Recurring Charges</b>	\$261.76	<b>One-time non-recurring charges</b>	\$0.00
<b>Less Ineligible Amount (if any)</b>	\$0.00	<b>Less Ineligible Amount (if any)</b>	\$0.00
<b>Number of Months</b>	12		
<b>Eligible recurring charges</b>	<b>\$3,141.12</b>	<b>Eligible non-recurring charges</b>	<b>\$0.00</b>
			<b>Line item TOTAL \$3141.12</b>

FRN total: \$49,485.36  
 Funding Requested on 471: \$49,485.36  
 Difference: \$0.00

FRN: 2382752 Funding Category: TELCOMM SERVICES  
 Submitted: 3/20/2012 5:10:33 PM Service Provider: AT&T Mobility  
 SPIN: 143025240  
 Attachment Number: Cellular12-13  
 Narrative description of this Funding Request: Cellular and Push-To-Talk service for district  
 Further information:  
 Number of Line Items: 2

Service Type	Service Description		
1 of 2 Cellular (including PCS)	Push To Talk		
		<b>Number of Telecom Lines (if applicable)</b>	85
<b>Recurring Charges</b>		<b>Non Recurring Charges</b>	
<b>Monthly Recurring Charges</b>	\$1,104.15	<b>One-time non-recurring charges</b>	\$0.00
<b>Less Ineligible Amount (if any)</b>	\$0.00	<b>Less Ineligible Amount (if any)</b>	\$0.00
<b>Number of Months</b>	12		
<b>Eligible recurring charges</b>	<b>\$13,249.80</b>	<b>Eligible non-recurring charges</b>	<b>\$0.00</b>
			<b>Line item TOTAL \$13249.8</b>

Service Type	Service Description		
2 of 2 Cellular (including PCS)	Cellular voice plus Push To Talk		
		<b>Number of Telecom Lines (if applicable)</b>	30
<b>Recurring Charges</b>		<b>Non Recurring Charges</b>	
<b>Monthly Recurring Charges</b>	\$1,379.70	<b>One-time non-recurring charges</b>	\$0.00
<b>Less Ineligible Amount (if any)</b>	\$0.00	<b>Less Ineligible Amount (if any)</b>	\$0.00
<b>Number of Months</b>	12		
<b>Eligible recurring charges</b>	<b>\$16,556.40</b>	<b>Eligible non-recurring charges</b>	<b>\$0.00</b>
			<b>Line item TOTAL \$16556.4</b>

FRN total: \$29,806.20  
 Funding Requested on 471: \$29,806.20  
 Difference: 0.00

# **ATTACHMENT 5**

## **Letter of Agency**

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Letter of Appeal

Deer Creek Independent School Dist, Form 471 Application Number 873159, FRN 2382660

Kellogg & Sovereign Consulting, LLC Phone: 580-332-1444



## **LETTER OF AGENCY - E-Rate Funding Years 2011-2015**

I authorize Jane Kellogg, Debi Sovereign, Mel Van Patten, and/or Mandy Harmon Wood - representatives of Kellogg & Sovereign® Consulting, LLC (collectively "KSLLC") – to submit Federal Communications Commission ("FCC") Forms 470, 471, 486, 500, 472 and other forms requested by the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") on behalf of our school and/or school district. We also authorize the aforementioned representatives to act as our agents in soliciting and receiving proposals, and preparing comparisons of proposals from service providers.

Name of Applicant (USAC Entity #): **DEER CREEK INDEPENDENT SCHOOL DISTRICT (BEN# 139733)**

Although not exclusive, KSLLC is specifically authorized to conduct the following actions:

- ♦ Prepare and submit documentation on behalf of the Applicant to USAC and/or the FCC in compliance with E-Rate program rules and regulations.
- ♦ Act as our agent in working with representatives of the FCC, USAC, and/or SLD to provide information as requested during application review, selective reviews, site visits, audits and any other activity associated with review of our applications.
- ♦ Prepare Requests for Proposal ("RFPs") to be posted to the KSLLC website and distributed to appropriate service providers.
- ♦ Provide information to service providers as needed to clarify information in RFPs and Forms 470.
- ♦ Solicit and receive proposals from service providers for requested services.
- ♦ Complete contracts for eligible E-Rate services as specifically directed by the Applicant's authorized representative.

**I also understand that in submitting these forms on our behalf, representatives of Kellogg & Sovereign® Consulting, LLC are making certifications for our school and/or school district. By signing this letter of agency under oath, I make the following certifications as required by the FCC<sup>1</sup>:**

I certify that the school(s) I represent are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entities I represent will secure access separately or through this program, to all of the resources including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that I have considered what financial resources should be available to cover these costs. I certify that the entities I represent will secure access to all of the resources to pay the discounted charges for eligible services from funds to which access will be secured in the applicable funding year(s). I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

I certify that, if required by Commission rules, all of the individual school(s) I represent are covered by technology plans that cover all 12 months of the applicable funding year(s), and that have been or will be approved by a state or other authorized body or an SLD-certified technology plan approver prior to the commencement of service.

I authorize Kellogg & Sovereign® Consulting, LLC to post my Form 470 and (if applicable) make my RFP available for at least 28 days before the applicant considers all bids received and selects service providers. I certify that all bids submitted will be carefully considered and the bid(s) selected will be for the most cost-effective service or

<sup>1</sup> Certifications per FCC Forms 470, 471 and 486. <http://www.usac.org/sl/tools/forms.aspx> 5/15/2012

equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology plan goals.

I certify that I will review all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities I represent will comply with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. §§ 54.500, 54.513. Additionally, I certify that the entity or entities listed on our forms have or will not receive anything of value or a promise of anything of value, other than services and equipment sought by means of forms submitted with the Schools & Libraries Division, from the service provider, or any representative or agent thereof or any consultant in connection with the request for services.

I certify that I and the entity(ies) I represent will comply with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There will be signed contracts covering all of the services listed on the Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the form for, receipt of, and delivery of services receiving schools and libraries discounts. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) I represent. I certify that I am authorized to sign this Letter of Agency and all information to be provided to Kellogg & Sovereign® Consulting, LLC for the E-Rate submission will be true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to the associated applications have complied with the terms, conditions, and purposes of this program, that no kickbacks were or will be paid to anyone and that false statements on FCC forms can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on our FCC forms, or any person associated in any way with my entity and/or the entities listed on our FCC forms, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the funding requests listed on our FCC forms are for discounts for products or services that contain both eligible and ineligible components that Kellogg & Sovereign® Consulting, LLC on our behalf will allocate the cost of the contract to eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504(g)(1),(2).

I certify that funding requests included on the related FCC forms will not constitute a request for internal connections services, except basic maintenance services, in violation of the Commission requirement that eligible

entities are not eligible for such support more than twice every five funding years as required by the Commission's rules at 47 C.F. R. § 54.506(c).

I certify that the non-discount portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services featured on the applicable FCC forms will be net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

I certify that prior to the commencement of service, the school(s) I represent will be in compliance with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l).

I certify that I am authorized to sign this Letter of Agency and, to the best of my knowledge, information and belief, all information provided to KLLC for E-Rate submission is true. If any of the statements made above are incorrect, fraudulent or misleading, the undersigned and their institution agrees to indemnify KSLLC, its members, employees and agents of any and all liability, legal fees or actions that may arise from the incorrect, fraudulent or misleading statement(s).

Applicant Name, City, State: DEER CREEK INDEPENDENT SCHOOL DISTRICT, EDMOND, OK (BEN# 139733)

Signature of Authorized Person: Mandy E. Godfrey Date: 11-26-12

Printed Name of Authorized Person: Mandy E. Godfrey Title: Director of Technology

*This authorization shall remain in effect until KSLLC is notified of its cancellation in writing via certified mail.*