

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

In the Matter of)

Request for Review of Decision of the)
Universal Service Administrator)

Pender County School District)
North Carolina)

CC Docket No. 02-6

FCC Form 471 Application #: 836862

FRN 2388626 (FY 2012)

To: Chief, Wireline Competition Bureau

SUPPLEMENT TO REQUEST FOR REVIEW

John W. Hughes
Pender County School District
c/o New Hope Foundation
One Valentine Lane
Chapel Hill, NC 27516
(919) 968-4332
jhughes@newhopetech.org

*Contracted Consultant & Contact for
Pender County School District*

Dated: January 21, 2013

TABLE OF CONTENTS

SUMMARY..... 1

I. STATEMENT OF THE DISTRICT’S INTEREST IN THE REQUEST 3

II. INTRODUCTION – BASIS FOR DENIAL 3

III. KEY BACKGROUND FACTS..... 3

 A. The District..... 3

 B. The Underlying Denial Finding 4

 C. SLD Guidance and Procedures Used by the District to Complete FCC
 Form 471’s and Make Corrections As a Result of Ministerial and Clerical
 Errors 4

IV. STANDARD OF REVIEW AND GOVERNING PRECEDENT 7

VI. ARGUMENT 9

 A. The District’s Response to the Denial Finding that the District Did Not
 Adhere to the Guidance Relative to Ministerial and Clerical Errors..... 10

 B. The District’s Response to the Denial Finding The the District Requested
 Additional Funds Not Included in the FCC From 471. 12

VII. REQUEST FOR WAIVER..... 12

 A. The Law 12

 B. Limited Request for Waiver of the Commission’s Rules, Including Rules
 Relating to Surveys..... 13

VIII. CONCLUSION AND REQUEST FOR RELIEF..... 15

SUMMARY

This Supplement is a replacement for a Supplement dated January 15, 2012 and withdrawn on January 16, 2013.

This Supplement is made to a Request for Review (“Request”) filed on December 21, 2012 by the Pender County School District (the “District” or “Pender County”). The Request being supplemented herein involves primarily the propriety of the District’s submission to the Schools and Libraries Division of the Universal Services Administrative Company (collectively, “USAC”) of a request to remove certain billed entities (BEN’s) that were to receive certain eligible services supported under the Schools and Libraries Support Mechanism (“E-Rate Program”) administered by the Schools and Libraries Division of the Universal Services Administrative Company (collectively, “USAC”). USAC contends that the request did not meet the standard for a clerical & ministerial error.

The District respectfully submits that the grounds on which USAC justifies their decision cannot be sustained. The District followed the applicable rules in requesting the removal of the entities and has provided supporting documentation to USAC to support its contention.

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

In the Matter of)	
)	
Request for Review of Decision of the)	CC Docket No. 02-6
Universal Service Administrator)	
)	
Pender County School District)	FCC Form 471 Application #: 836862
North Carolina)	

To: Chief, Wireline Competition Bureau

SUPPLEMENT TO REQUEST FOR REVIEW

Pender County School District (the “District” or “Pender County”), acting through counsel and pursuant to and in accordance with Sections 54.719-54.721 of the Federal Communication Commission’s (“FCC” or “Commission”) rules, hereby supplements its previously-filed Request for Review (“Request”).¹ Therein, the District sought review of USAC’s denial of the District’s appeal (“Appeal”) for Funding Years (“FY”) 2012.

¹ On December 21, 2012 the District filed a Request with the Commission (See Exhibit 1) seeking review of the denial of the August 28, 2012 District appeal (See Exhibit 2 and 3) filed with the Schools and Libraries Division of the Universal Service Administrative Company (collectively, “USAC”) relating to the captioned FRNs. The District USAC Appeal contested the USAC Funding Commitment Decision Letter (“FCDL” and See Exhibit 4) relating to those FRNs. The Request was timely filed on December 21, 2012. Section 54.720(b) of the Commission’s rules requires the filing of an appeal with the FCC “within sixty (60) days of issuance” of a decision by USAC. The Decision Letter is dated October 23, 2012, and 60 days thereafter would be December 22, 2012. Since the Request was filed on December 21, 2012, which is 59 days from the date of the Decision Letters, it was timely filed.

I. STATEMENT OF THE DISTRICT’S INTEREST IN THE REQUEST

The District had standing to file its appeal because Section 54.719(c) of the Commission’s rules provides that, “[a]ny person aggrieved by an action taken by a division of the Administrator ... may seek review from the Federal Communications Commission.”² In this case, the District is directly aggrieved by USAC’s Decision Letter, which seeks to deny funding for E-Rate Program funds for FY 2012.

II. INTRODUCTION- BASIS FOR DENIAL

This USAC Decision Letter affirms a decision relating to the captioned FRNs and was based on an exchange of information between USAC and the District.

Based on the Decision Letter the principal reason that became the basis for the denial was “After review of the supporting the documentation used at the time of the filing the FCC Form 471, it has been determined that it does not support the requested change [of the removal of one entity], therefore your request to remove this entity is denied.” The District respectfully disagrees with the justification for the denial and requests that it be rescinded in full. The rationale for this disagreement is presented below.

III. KEY BACKGROUND FACTS

A. The District

The District serves over 8,000 students in grades kindergarten through twelfth grade. Pender County’s student population has increased by 32% in the past 20 years. The District enjoys strong community support for its schools, partnerships with business and faith based organizations, and substantial parental involvement. Student achievement ranks among the top

² 47 C.F.R. § 54.719(c).

tier of all North Carolina school districts. Diversity in the District is evidenced by the over 18 languages spoken by students and their families. In order to improve the quality of instruction in this poor part of North Carolina the District must update its educational services. The District's goal is to "empower[] all students to become successful in a global society."

B. The Underlying Denial Finding

Based on the Decision Letter the principal reason that became the basis for the denial was "After review of the supporting the documentation used at the time of the filing the FCC Form 471, it has been determined that it does not support the requested change [of the removal of one entity], therefore your request to remove this entity is denied."

C. SLD Guidance and Procedures Used by the District to Complete Form 471's and Make Corrections As a Result of Ministerial & Clerical Errors

The District each year makes a determination of what Erate fundable services it will need for the next school year and completes a FCC Form 470 listing those services. Bids are received in the succeeding twenty-eight (28) day period and at the conclusion of twenty-eight days each bid is scored according to a decision matrix and the winning bidder is awarded a contract for the particular service in question. The District also determines the number of NSLP qualified students using either the number of NSLP participants or the result of an alternative income survey conducted according to USAC guidance. Each school and non instructional entity is listed on a District prepared spreadsheet which lists each school's entity number, its enrollment, its number of NSLP qualified students, and the method of calculating the school's discount (either NSLP of alternative survey) (See Exhibit 7).

The FCC Form 471 for Priority 1 is then completed by entering the applicable District information in Blocks 1 and 2. Block 4 contains the discount information and calculation for each entity receiving service. The District completes this Block by transferring the discount information for the entire District from Block 4 of the previous year's Priority 1 471 application onto the current year's Priority 1 application and then updating any information needed as per the aforementioned spreadsheet. This saves the district the time of manually re-entering each entity into the Priority 1 Block 4 section of the application.

The FCC Form 471 for Priority 2 is then completed by entering the applicable District information in Blocks 1 & 2. Block 4 contains the discount information and calculation for each entity receiving service. The Priority 2 application usually contains less entities than the Priority 1 application therefore the District completes this Block by transferring the discount information for the entire District from Block 4 of the current year and just completed Priority 1 471 application onto the Priority 2 application and then deleting entities until it balances with the information from the aforementioned discount spreadsheet. This saves the district the time of manually re-entering each entity into the Priority 2 Block 4 section of the application. Block 5 contains the information about each winning service provider including the contracted amount for which funding will be requested. This information is obtained from the decision matrixes and the service provider quotes or contracts. Block 6 is completed by entering the appropriate information about the District and making the appropriate certifications.

In the instance of FCC Form 471 # 836862 for Priority 2 services the District made an error in completing the form. One entity was included in Block 4, Worksheet 1495565, which should not have been included. This entity was not listed on the discount spreadsheet (which was prepared prior to the completion of the FCC Form 471) prepared by the district and which was

used to complete the Block 4 worksheet. Quite simply, this entity should have been eliminated when the Block 4 data was transferred from the Priority 1 application and its inclusion was the result of a clerical error.

The guidance posted to the USAC website (<http://www.universalservice.org/sl/applicants/step02/clerical-errors.aspx>) at the time of the FY 2012 applications relative to ministerial & clerical errors states that:

“Ministerial and clerical (M&C) errors are defined as data entry errors or mistakes applicants made on the FCC Form 470 or FCC Form 471. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error.” (Order FCC 11-60, released April 14, 2012). USAC can process Requests to correct M&C errors up until the time that a Funding Commitment Decision Letter (FCDL) is issued.

Allowable Corrections

- Spelling errors
- Simple addition, subtraction, multiplication or division errors
- Transposed letters and/or numbers
- Misplaced decimal points
- Other punctuation marks (hyphens, periods, commas, etc.) included or not included or misplaced
- Failing to enter an item from the source list (e.g., NSLP data, uploaded Block 4 data, FRN, etc.)
- Incorrect citations such as:
 - FCC Form 470 number
 - Discount percent
 - Urban/rural status
 - Contract number
 - Billing Account Number/Multiple Billing Account Numbers
 - FCC Form 471 Block 4 worksheet entries
- Updates or changes to contact person and/or consultant information
- Errors in dollars figures on an FRN
- Adding or removing entities accidentally omitted or included in FCC Form 471 Block 4
- Accidental omission of FRNs from the FCC Form 471
- Changing the amount budgeted for ineligible services (Item 25d, “necessary resources”) in FCC Form 471 Block 6
- Changing the service delivery time period (e.g., month-to-month to contractual, recurring to non-recurring)
- Mis-keying the Service Provider Identification Number (SPIN) or Service Provider Name
- Corrective SPIN changes
- Correcting the annual charges for recurring charges
- Incorrectly identifying ineligible charges and/or services or products

Request to correct M&C errors should be submitted to USAC as soon as the errors are detected by the applicant. USAC will accept and process Request until an FCDL is issued.”

The District notified USAC on August 1, 2012 of the error in Block 4 of application 836862 and requested that the entity in question be removed due to a ministerial & clerical error. USAC on that same day confirmed receipt of the notice and request (See Exhibits 5). On August 13, 2012 USAC sent a FCDL to the District denying the funding request (See Exhibit 4). As the District notified USAC of the error before the FCDL was issued, the notice requirement of the guidance was met.

The District then filed a Letter of Appeal on August 28, 2012 with USAC (See Exhibit 3). A USAC Program Compliance reviewer on September 26, 2012 requested clarification of the appeal in an email to the District's consultant which was answered via email by the consultant back to the reviewer on October 8, 2012 (see Exhibit 6). The District provided copies of the Block 4 input documents in the form of the aforementioned discount spreadsheets that the district used to complete Block 4, Worksheet 1495565. These spreadsheets clearly demonstrate that the entity in question was not intended to be included in Worksheet 1495565. The District also provided vendor quotes and these documents detail the individual entities that were to receive service and they clearly show that the entities to receive service are identical to ones listed on the Block 4 input spreadsheets and do not include the entity that the RAL requested to be deleted..

IV. STANDARD OF REVIEW AND GOVERNING FCC PRECEDENT

USAC's authority to administer the E-Rate Program is limited to implementing and applying the Commission's rules and the Commission's interpretations of those rules as found in agency adjudications.³ USAC is not empowered to make policy, interpret any unclear rule

³ 47 C.F.R. § 54.702(c).

promulgated by the Commission,⁴ or to create the equivalent of new guidelines.⁵ USAC is responsible for “administering the universal support mechanisms in an efficient, effective, and competitively neutral manner.”⁶ The Commission’s review of the Decision Letter is *de novo*, without being bound by any findings of USAC.⁷

Furthermore the *de novo* review in this case must consider the following relevant FCC precedents:

- Until an E-Rate Program rule is adopted, an applicant cannot be expected to comply with it.⁸

- Compliance with ministerial and clerical error standards must be measured “as they existed at [the] time” of the alleged violation.⁹

- Clarifications or changes to E-Rate Program rules and policies are normally to be applied prospectively by USAC.¹⁰

- USAC should not be denying funding “where the applicant made a good faith effort to comply with the funding guidelines” and should inform the applicants prior to denying funding

⁴ *Id.*

⁵ *Changes to the Board of Directors of the Nat’l Exchange Carrier Ass’n, Inc., Third Report and Order*, 13 FCC Rcd 25058, 25066-67 (1998).

⁶ 47 C.F.R. § 54.701(a).

⁷ 47 C.F.R. § 54.723.

⁸ *See Request 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, Order*, 23 FCC Rcd 8735, 8737 ¶6 (2007).

⁹ *See In the Matter of Request for Review of Decisions of the Universal Service Administrator by Colegio Nuestra Senora del Carmen et al., Schools and Libraries Universal Support Mechanism, Order*, 23 FCC Rcd 15568, 15573 ¶12 (Telecom. Access Pol. Div. 2008).

¹⁰ *See Request for Review of the Decision of the Universal Service Administrator by Ysleta, Independent School District, El Paso, Texas, Schools and Libraries Universal Support Mechanism, Order*, 18 FCC Rcd 26406, 26419-23 ¶¶26-38 (2003); *Request for Review of the Decision of the Universal Service Administrator by Winston Salem/Forsyth County School District, Winston-Salem North Carolina, Schools and Libraries Universal Support Mechanism, Order*, 18 FCC Rcd 26457, 26462 ¶13 (2003).

of “any errors..., along with a specific explanation of how the applicant can remedy such errors.”¹¹

- The Commission noted that it “has vested in USAC the responsibility of administering the application process for the schools and libraries universal service support mechanism;” pursuant to that authority, USAC developed procedures relating to the application and appeals process and in *Bishop Perry*, the Commission applied the 47 C.F.R. § 1.3 waiver rule to allow a limited waiver of USAC procedures.¹²

A review of the Request in light of these standards and precedent will reveal that the Decision Letter was not supported by FCC law or policies. Most fundamentally, USAC failed to explain why it decided to ignore the District’s request to remove the entity or the explanation of its ministerial and clerical errors and the guidance posted to the USAC website relative to ministerial and clerical errors. This action flies in the face of repeated Commission admonitions that applicants should have the opportunity to correct their mistakes and that USAC must explain its actions.

VI. ARGUMENT

As previously noted, the Decision is based on the assertions that the District did not comply with the ministerial and clerical error procedures, which conclusions are discussed in detail and refuted by Pender County as follows:

¹¹ *Request for review of the Decision of the Universal service Administrator Academia Claret, Puerto Rico, et al.*, 21 FCC Rcd 10703, 10709 ¶14 (Wireline Compet. Bur. 2006).

¹² *Request for Review of Decision by the Universal Service Administrator by Bishop Perry Middle School, Order*, 21 FCC Rcd 5316, 5618 ¶4 (2006)(“*Bishop Perry Order*”).

A. The District's Response to the Denial Finding that the District Did Not Adhere to the Guidance Relative to Ministerial and Clerical Errors

Decision Letter Assertion – “A Form 471 Receipt Acknowledgement Letter (RAL) was sent to Pender County School District on March 28, 2012. The RAL lists allowable clerical and ministerial corrections to the FCC Form 471 including modifications to Block 4. Corrections may be submitted up to the time that funds are committed. The Funding Commitment Decision letter was issued on August 13 2012. On July 20, 2012, Pender County School District requested to correct a ministerial or clerical error by the removal of [one entity] from Block 4 Worksheet No: 1495565 for FRN 2388626. During the appeal review process, Pender County School District was asked to confirm their request to remove this entity from Block 4, and provide supporting documentation to determine whether or not a ministerial and clerical error occurred. According to FCC Order (FCC 11-60) ministerial and clerical errors are defined as follows: “The applicant can amend its forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentations until a FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error.” After review of the supporting documentation used at the time of the filing of the FCC Form 471, it has been determined that it does not support the requested change, therefore your request to remove the entity is denied.”

The District's Response -- As stated earlier, The District determines the number of NSLP qualified students using either the number of NSLP participants or the result of an alternative income survey conducted according to USAC guidance. Each school and non instructional entity is listed, prior to preparing and completing the FCC Form 471, on a District prepared spreadsheet (See Exhibit 7) which lists each school's entity number, its enrollment, its number of NSLP qualified students, and the method of calculating the school's discount (either NSLP of alternative survey). These items are the necessary elements that have to be entered into each entity's section of the Block 4.

The FCC Form 471 for Priority 1 is then completed by entering the applicable District information in Blocks 1 & 2. Block 4 contains the discount information and calculation for each entity receiving service. The District completes this Block by transferring the discount information for the entire District from Block 4 of the previous year's Priority 1 471 application

onto the current year's Priority 1 application and then updating any information needed as per the aforementioned spreadsheet. This saves the district the time of manually re-entering each entity into the Priority 1 Block 4 section of the application.

The FCC Form 471 for Priority 2 is then completed by entering the applicable District information in Blocks 1 & 2. Block 4 contains the discount information and calculation for each entity receiving service. The District completes this Block by transferring the discount information for the entire District from Block 4 of the current year and just completed Priority 1 471 application onto the Priority 2 application and then deleting entities until it balances with the information from the aforementioned spreadsheet. This saves the district the time of manually re-entering each entity into the Priority 2 Block 4 section of the application. Block 5 contains the information about each winning service provider including the contracted amount for which funding will be requested. This information is obtained from the decision matrixes and the service provider quotes or contracts. Block 6 is completed by entering the appropriate information about the District and making the appropriate certifications.

In the instance of FCC Form 471 # 836862 Worksheet No:1495565 for Priority 2 services, the District made an error in completing the form. The entity in question was not deleted from Block 4 of the Priority 2 application when the upload was done from the Priority 1 application. This entity was not listed on the discount spreadsheet prepared by the district and which was used to complete the Block 4 worksheet. Quite simply, this entity should have been eliminated when the Block 4 data was transferred from the Priority 1 application and its inclusion was the result of a clerical error.

Additionally the quote supplied by the service provider lists the service to be provided to each entity and the entity mistakenly included on Block 4 was not included in the quote. Clearly

this error meets the standard of the “kinds of errors that a typist might make when entering data from one list to another”.

B. The District’s Response to the Denial Finding that the District Requested Additional Funds That Were Not Included in the FCC Form 471

Decision Letter Assertion – “Your appeal Request additional funds that were not included in the FCC Form 471 that you are appealing.”

The District’s Response – The District respectfully submits that this assertion is simply incorrect.

VII. REQUEST FOR WAIVER

A. The Law

The Commission’s rules allow waiver of a Commission rule “for good cause shown.”¹³ The Commission has extended this waiver authority to limited waivers of USAC rules. For example, in the *Bishop Perry Order*, the Commission noted that it “has vested in USAC the responsibility of administering the application process for the schools and libraries universal service support mechanism.”¹⁴ Pursuant to that authority, USAC developed procedures relating

¹³ 47 C.F.R. § 1.3.

¹⁴ *Bishop Perry Order*, ¶4.

to the application and appeals process.¹⁵ Thus, in *Bishop Perry*, the Commission applied the 47 C.F.R. § 1.3 waiver rule to allow a limited waiver of USAC procedures.¹⁶

The FCC has established the following guidance for determining whether waiver is appropriate:

A rule may be waived where the particular facts make strict compliance inconsistent with the public interest. In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis. In sum, waiver is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule.¹⁷

B. Limited Request for Waiver of the Commission’s Rules, Including Rules Relating to Ministerial and Clerical Errors

Strict compliance with the Commission’s rules would not be in the public interest. In *Bishop Perry*, the FCC granted 196 appeals of decisions denying funding due to “clerical or ministerial errors in the application.”¹⁸ In that case, the FCC found good cause to waive the minimum processing standards established by USAC, finding that “rigid compliance with the application procedures does not further the purposes of section 254(h) or serve the public interest.”¹⁹ Many of the appeals in *Bishop Perry* involved staff mistakes or mistakes made as a

¹⁵ The *Bishop Perry Order* dealt with USAC application procedures known as “minimum processing standards.” *Id.*

¹⁶ *Id.*

¹⁷ *Request for Review by Richmond County School District*, 21 FCC Rcd 6570, 6572 ¶5 (2006 (internal references omitted) (citing *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) and *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), *aff’d*, 459 F.2d 1203 (D.C. Cir. 1972)).

¹⁸ *Bishop Perry Order*, ¶1.

¹⁹ *Id.*, ¶11. The Commission departed from prior Commission precedent, noting that the departure was, “warranted and in the public interest.” *Id.*, ¶9. The Commission noted that many of the rules at issue were procedural, and that a waiver is consistent with the purposes of Section 254, which directs the

result of staff not being available.²⁰ The Commission granted the waivers for good cause, noting that:

[T]he primary jobs of most of the people filling out these forms include school administrators, technology coordinators and teachers, as opposed to positions dedicated to pursuing federal grants, especially in small school districts. Even when a school official has learned how to correctly navigate the application process, unexpected illnesses or other family emergencies can result in the only official who knows the process being unavailable to complete the application on time. Given that the violation at issue is procedural, not substantive, we find that the complete rejection of each of these applications is not warranted. Notably, at this time, there is no evidence of waste, fraud or abuse, misuse of funds, or a failure to adhere to core program requirements. Furthermore, we find that denial of funding in these cases would inflict undue hardship on the applicants.²¹

The Commission directed USAC to allow applicants the opportunity to fix ministerial and clerical errors and concluded that such an opportunity would “improve the efficiency and effectiveness of the Fund.”²² The District clearly falls into the same category. A limited waiver of this rule will not adversely affect any other applicant. The Commission may also taken into consideration “hardship, equity, or more effective implementation of overall policy on an individual basis.”²³ In this case, deviation from the Commission’s rules would better serve the public interest than strict application of the appeal filing deadline. Moreover, the overwhelming contemporaneous evidence proves that the District took steps to attempt to properly complete Block 4 of the FCC Form 471 application in question. Thus, any errors in this case should not be

Commission to “enhance ... access to advanced telecommunications and information services for all public and non-profit elementary and secondary school classrooms, health care providers and libraries.”
Id.

²⁰ *Id.*, ¶13.

²¹ *Id.*, ¶14.

²² *Id.*, ¶23.

²³ *Request for Waiver of the Decision of the Universal Service Administrator by Owensboro Public Schools, Owensboro, Kentucky, Order*, 21 FCC Rcd 10047, ¶5 (2006).

considered substantive, and there is no evidence of waste, fraud or abuse, misuse of funds, or a failure to adhere to core program requirements.²⁴

VIII. CONCLUSION AND REQUEST FOR RELIEF

First, the District requests the Commission to make a finding that USAC failed to properly apply its ministerial and clerical guidance rules and based on the evidence submitted, there has been no rule violation. The District respectfully requests that the Commission grant this Request and direct USAC to approve the 471 application within 30 days.

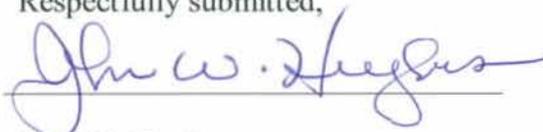
Second, in the alternative, if necessary, the Commission should waive the ministerial and clerical rule, because there is no evidence of waste, fraud, or abuse, or failure to comply with the core program requirements, and the District complied with the ministerial and clerical guidance requirements. The mistakes at the heart of this appeal are not substantive errors and, thus, a limited waiver would be in the public interest. At all times the District made a good faith effort to comply with the Commission's rules and there is no evidence of waste, fraud or abuse.

In the spirit of the *Bishop Perry Order*, the Commission should grant the Request. The District has demonstrated good cause for a limited waiver of the Commission's rules: any mistakes that were made with respect to the Block 4 entries were not substantive and inadvertent; there is no evidence of waste, fraud, or abuse, and the District complied with core program

²⁴ Where there is no evidence of any intent to defraud or misuse the funds of the E-Rate program and in such circumstances, when combined with the other factual circumstances, there is not grounds to justify the harsh penalty of a denial of these funds. *See generally Request for Waiver of the Decision of the Universal Services Administrator by Barberton City School, Barberton, Ohio et al., Schools and Libraries Universal Service Support Mechanism, Order*, 23 FCC Rcd 15526, 15530 ¶7 (Telecom. Access Pol. Div. 2008). Considerations of equity and hardship also support such a result. *See generally Request for Review of Decisions of the Universal Service Administrator by Approach Learning and Assessment Centers et al, Schools and Libraries Universal Service Support Mechanism, Order*, 23 FCC Rcd 15510-15513-14 ¶8 (Telecom. Access Pol. Div. 2008). *See Request for Review of Decision of the Universal Service Administrator by Radford City Schools, Radford, Virginia, Schools and Libraries Universal Support Mechanism, Order*, 23 FCC Rcd 15451, 15453 ¶4 (Telecom. Access Pol. Div. 2008).

requirements; and the public interest would be served by permitting the District to have this application approved.

Respectfully submitted,

A handwritten signature in blue ink, reading "John W. Hughes", written over a horizontal line.

John W. Hughes
Pender County School District
c/o New Hope Foundation
One Valentine Lane
Chapel Hill, NC 27516
(919) 968-4332

*Contracted Consultant & Contact
for Pender County School District*

Dated: January 21, 2013

CERTIFICATE OF SERVICE

I, John W. Hughes, certify on this 21st day of January, 2013, a copy of the foregoing Supplement to Request for Review has been served via electronic mail or first class mail, postage pre-paid, to the following:

Priya Aiyar
Legal Advisor to Chairman Genachowski
Federal Communications Commission
445 12th Street, S.W.
Pender, D.C. 20554
Priya.Aiyar@fcc.gov

Randy Clarke
Legal Counsel to the Bureau Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Pender, D.C. 20554
Randy.Clarke@fcc.gov

Gina Spade
Assistant Division Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Pender, D.C. 20554
Gina.Spade@fcc.gov

Sharon Gillette
Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Pender, D.C. 20554
Sharon.Gillette@fcc.gov

Trent Harkrader
Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Pender, D.C. 20554
Trent.Harkrader@fcc.gov

Letter of Appeal
Schools and Libraries Division-
Correspondence Unit
100 S. Jefferson Road
P.O. Box 902
Whippany, NJ 07981
appeals@sl.universalservice.org

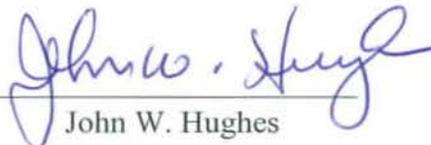

John W. Hughes

Exhibit 1

Exhibit 1

New Hope Foundation
One Valentine Lane
Chapel Hill, NC 27516

December 21, 2012

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Appeal of USAC Decision On Appeal of Administrators Decision on Appeal in CC
Docket No. 02-6**

Applicant Name:	Pender County School District
Billed Entity Number:	127007
Funding Year	2012
Form 471 App. Number:	836862
Funding Request Numbers:	2388626

Dear Ms. Dortch:

Pender County School District of Pender County, North Carolina ("Pender County" or "District"), acting through counsel and pursuant to Sections 54.719-54.721 of the Commission's rules¹, hereby timely files this Request for Review or Waiver ("Appeal"). The Appeal requests Commission review of the adverse decision of the Administrator of the Universal Service Administrative Company ("USAC") denying the funding request(s) enumerated above for Funding Year 2012.²

More specifically, on October 23, 2012, USAC's Schools and Libraries Division ("SLD") issued a decision denying an appeal filed by Pender County with USAC. In its decision on appeal USAC held that its previously-issued determination to deny funds³ was justified based on findings that the District failed to properly provide sufficient evidence that the applicant made a clerical and ministerial error in the preparation of its FCC Form 471. Specifically the decision stated that the

¹ 47 C.F.R. §§ 54.719-54.721.

² Administrator's Decision on Appeal - Funding Year 2012 - 2013, Pender County School District (October 23, 2012), attached as Exhibit 1.

³Funding Commitment Decision Letter, August 13, 2012 ("FCDL").

Ms. Marlene H. Dortch
December 21, 2012
Page 2

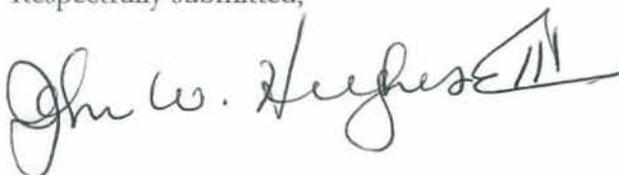
documentation provided by District to support the fact that a clerical and ministerial error was made at the time of the preparation of the applicant's FCC Form 471 does not support the requested removal of one entity from Block 4 of the FCC Form 471.

We respectively disagree with this decision. We responded upon the request of USAC reviewers on October 8, 2012 and included the documentation that was used to input the list of entities in Block 4 of FCC Form 471 at the time that Form was prepared, submitted, and certified. The documents offer positive proof that indeed a clerical and ministerial error was made at the time of the preparation of the form. Further we submitted to USAC a RAL correction form on August 1, 2012 notifying USAC of the error and requesting that the error be corrected. Such notification was made prior to the issuance of the FCDL.

Pender County is aggrieved by USAC's October 23, 2012 decision and submits that for various reasons outlined in its original August 28, 2012 appeal to USAC and others that the decision is unjustified and in error. Specifically, the decision regarding the fact of whether a clerical and ministerial error was made in the preparation of the applicant's FCC Form 471 is unwarranted and unjustified under the rules, policies and requirements governing the correction of clerical and ministerial errors.

Pender County will supplement this Appeal with a full discussion of the facts, the District's position and supporting arguments.

Respectfully submitted,

A handwritten signature in black ink that reads "John W. Hughes III". The signature is written in a cursive style with a prominent, stylized "H" at the end.

John W. Hughes III
Consultant to Pender County School District
New Hope Foundation
One Valentine Lane
Chapel Hill, NC 2716

Exhibit 2



Universal Service Administrative Company
Schools & Libraries Division

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

October 23, 2012

John Hughes
New Hope Technology Foundation
1 Valentine Lane
Chapel Hill, NC 27516

Re: Applicant Name: PENDER COUNTY SCHOOL DISTRICT
Billed Entity Number: 127007
Form 471 Application Number: 836862
Funding Request Number(s): 2388626
Your Correspondence Dated: August 28, 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): 2388626
Decision on Appeal: **Denied**
Explanation:

- A Form 471 Receipt Acknowledgment Letter (RAL) was sent to Pender County School District on March 28, 2012. The RAL lists allowable clerical and ministerial error corrections to the FCC Form 471 including modifications to Block 4. Corrections may be submitted up to the time that funds are committed. The Funding Commitment Decision Letter was issued on August 13, 2012. On July 20, 2012, Pender County School District requested to correct a ministerial or clerical error by the removal of BEN 29695 North Topsail ES from Block 4 Worksheet No. 1495565 for FRN 2388626. During the appeal review process, Pender County School District was asked to confirm their request to remove this entity from Block 4, and provide supporting documentation to determine whether or not a ministerial and clerical error occurred. According to FCC Order (FCC 11-60), ministerial and clerical errors are defined as follows: "The applicant can

amend its forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error". After review of the supporting documentation used at the time of the filing of the FCC Form 471, it has been determined that it does not support the requested change, therefore your request to remove this entity is denied.

- Your appeal requests additional funds that were not included in the FCC Form 471 that you are appealing. FCC rules require that funding requests must be submitted via an FCC Form 471. *See* 47 C.F.R. sec. 54.504(a). Considerations for funding requests depend on the date the FCC Form 471 is received and the amount of funds available if it is received after the close of the filing window. *See* 47 C.F.R. sec. 54.507(g)(1)(i)-(v). The FCC directed USAC to allow applicants to amend their forms to correct clerical and ministerial errors on their FCC Forms 470, FCC Form 471 applications, or associated documentation until an FCDL is issued. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error. *See* In the Matter of Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Order, FCC 11-60 para. 5 (rel. April 14, 2011).
- The FCC's Bishop Perry Order directed USAC "to provide all E-rate applicants with an opportunity to correct ministerial and clerical errors on their FCC Form 470 or FCC Form 471, and an additional opportunity to file the required certifications" without posting new FCC Forms 470 and 471. *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, File Nos. SLD-487170, et al., CC Docket No. 02-6, *Order*, 21 FCC Rcd 5316-5317, FCC 06-54 para. 23 (May 19, 2006) (Bishop Perry Order). As a result, USAC sends an applicant a Receipt Acknowledgement Letter (RAL) when the FCC Form 471 has been successfully data entered and provides the applicant with an opportunity to make allowable corrections to its FCC Form 471. *See* www.usac.org/sl.

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

Exhibit 3

Exhibit 3

August 28, 2012

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

This letter of appeal is filed on behalf of:

Pender County School District
BEN 127007

by:

John W. Hughes
Contracted Consultant for Alexander County School District
New Hope Foundation
One Valentine Lane
Chapel Hill, NC 27516
jhughes@newhopetech.org
(919)968-4332

and is an appeal of a FCDL for 471 Application 836862 dated August 13, 2012 for:

FRN 2388626
Enterprise Systems Corporation
SPIN 143027887
\$416,005.37 Pre Discount Amount

On August 1, 2012 we filed a RAL for this application (attached) and received a receipt confirmation email (attached) from the SLD on August 1, 2012. USAC guidance on the submission of RAL's found on the SLD website at <http://www.universalservice.org/si/applicants/step02/clerkal-errors.aspx> states that an example of a correctable mistake is "Adding or removing entities accidentally omitted or included in FCC Form 471 Block 4". Such was the case in this application. On August 13, 2012 we received a FCDL (attached) for this application stating that the FRN's had been denied as "the funding cap will not provide for Internal Connections at your approved discount level to be funded". The guidance found at <http://www.universalservice.org/si/applicants/step02/clerkal-errors.aspx> further states that "USAC will accept and process (M&C) requests until an FCDL is issued". Our request of August 1, 2012 was submitted and received by USAC prior to the issuance of the FCDL but never processed. We respectfully ask that the FCDL denial be withdrawn and our request be processed according to USAC guidance.

Thank you,

John W. Hughes
For Pender County School District

Sharie Montgomery

From: Sharie Montgomery
Sent: Wednesday, August 29, 2012 4:41 PM
To: 'sldcaseattachments@sl.universalservice.org'
Subject: RE: SLD Inquiry #: 22-407590 Received
Attachments: 2012 Pender Co. appeal.pdf

Please see attached appeal.

Sharie Montgomery
 New Hope Foundation
 919.968.4332 office
 919.929.9074 fax

From: sldcaseattachments@sl.universalservice.org [mailto:sldcaseattachments@sl.universalservice.org]
Sent: Wednesday, August 29, 2012 4:32 PM
To: Sharie Montgomery
Subject: SLD Inquiry #: 22-407590 Received

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-407590.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

You indicated in your submission that you wish to send us an attachment. To submit an attachment, please reply to this message and attach your attachment to the reply. Any additional information you wish to provide should be included in the attachment, not added to the text of this email.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl.

Thank you.

Here is the information you submitted:

[FirstName]=Sharie [LastName]=Montgomery [JobTitle]=Consultant [EmailAddress]=smontgomery@newhopetech.org [WorkPhone]=9199684332 [FaxPhone]=9199299074 [PreviousCaseNumber]=0 [FormType]=Appeal [Owner]=APPEALS [DateSubmitted]=8/29/2012 4:31:37 PM [AttachmentFlag]=Y[FRN]=2388626 [FormType]=FCDL [ApplicationNumber]=836862 [Question2]=We are appealing the denial of all FRN's in the above application. Please see attachments for details.

8/29/2012

Exhibit 4

Exhibit 4



Universal Service Administrative Company

Schools and Libraries Division

FUNDING COMMITMENT DECISION LETTER
(Funding Year 2012: 07/01/2012 - 06/30/2013)

August 13, 2012

John Hughes
PENDER COUNTY SCHOOL DISTRICT
1 Valentine Lane
Chapel Hill, NC 27516

Re: Form 471 Application Number: 836862
Billed Entity Number (BEN): 127907
Billed Entity FCC RN: 0011966090
Applicant's Form Identifier: 2012 P2 redo

Thank you for your Funding Year 2012 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, \$370,244.78 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 836862 as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2012," 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

3. 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.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. 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 USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC 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

If you wish to appeal a decision in this letter to 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 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 in the Reference Area of 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.

OBLIGATION TO PAY NON-DISCOUNT PORTION

Applicants are required to pay the non-discount portion of the cost of the products and/or services to their service provider(s). Service providers are required to bill applicants for the non-discount portion. The FCC stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If USAC is being billed via the FCC Form 474, the service provider must bill the applicant at the same time it bills USAC. If USAC is being billed via the FCC Form 472, the applicant pays the service provider in full (the non-discount plus discount portion) and then seeks reimbursement from USAC. If you are using a trade-in as part of your non-discount portion, please refer to our website for more information.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company

FUNDING COMMITMENT REPORT
Billed Entity Name: PENDER COUNTY SCHOOL DISTRICT
BEN: 127007
Funding Year: 2012

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

Form 471 Application Number: 836862
Funding Request Number: 2388626
Funding Status: Not Funded
Category of Service: Internal Connections
Form 470 Application Number: 779540001019117
SPIN: 143027887
Service Provider Name: Enterprise Systems Corporation
Contract Number: N/A
Billing Account Number: 910-259-2187
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2012
Service End Date: N/A
Contract Award Date: 03/20/2012
Contract Expiration Date: 09/30/2013
Shared Worksheet Number: 1495565
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: \$416,005.37
Pre-discount Amount: \$416,005.37
Discount Percentage Approved by the USAC: 89%
Funding Commitment Decision: \$0.00 - Srvc/Discnt will NOT be funded
Funding Commitment Decision Explanation: DR: Given Program demand, the funding cap will not provide for Internal Connections and/or Basic Maintenance of Internal Connections at your approved discount level to be funded. Please see <http://www.universalservice.org/sl> for further details.

FCDL Date: 08/13/2012

Wave Number: 006

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2013

Consultant Name: New Hope Technology Foundation

Consultant Number (CRN): 16054699

Consultant Employer: New Hope Technology Foundation

Exhibit 5

Exhibit 5

John Hughes

From: sldcaseattachments@sl.universalservice.org**Sent:** Wednesday, August 01, 2012 4:31 PM**To:** John Hughes**Subject:** SLD Inquiry #: 22-397880 Received

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-397880.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

You indicated in your submission that you wish to send us an attachment. To submit an attachment, please reply to this message and attach your attachment to the reply. Any additional information you wish to provide should be included in the attachment, not added to the text of this email.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl.

Thank you.

Here is the information you submitted:

[FirstName]=John [LastName]=Hughes [JobTitle]=Consultant [EmailAddress]=jhughes@vistatm.com [WorkPhone]=9199684332 [FaxPhone]=9199299074 [PreviousCaseNumber]=0 [FormType]=Other [Owner]=TCSB [DateSubmitted]=8/1/2012 4:30:39 PM [AttachmentFlag]=Y[Question2]=Pls see attached RAL for 471 # 836862 Pender

8/1/2012

Please remove the following Entities that we accidentally included in our application due to a clerical error:

Application #	836862	
Worksheet #	1495565	
Entity Name & #	North Topsail ES	29695
Applicant Name	Pender County Schools	
Applicant BEN #	127007	

Respectively Submitted by



John Hughes, Contracted Consultant
New Hope Foundation
jhughes@newhopetech.org
(919)968-4334

John Hughes

From: sldnoreply@sl.universalservice.org
Sent: Wednesday, August 01, 2012 6:10 PM
To: John Hughes
Subject: RE: Initial Contact 22-397089

Thank you for your inquiry. You have indicated that you intended to submit attachments with your inquiry; however, we have not received them at this time. Please send your attachments to sldcaseattachments@sl.universalservice.org

If you have any further questions, please feel free to contact our Schools and Libraries Helpline at 1-888-203-8100. Please remember to visit our website for updates: <http://www.usac.org/sl>

Thank you,
Schools and Libraries Division
Universal Service Administrative Company

-----Original Message-----

From: jhughes@newhoptech.org
Subject: Initial Contact

[FirstName]=John
[LastName]=Hughes
[JobTitle]=Contracted Consultant
[EmailAddress]=jhughes@newhoptech.org
[WorkPhone]=9199684332
[FaxPhone]=9199299074
[PreviousCaseNumber]=0

[FormType]=Other
[Owner]=TCSB
[DateSubmitted]=8/1/2012 3:17:20 PM
[AttachmentFlag]=Y[Question2]=Please see the attached RAL for 471 # 836862 for Pender County Schools

**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1

Block 2 & 3

Block 4

Block 5

Block 6

Misc

471 Application No: 836862
Form Status: CERTIFIED - In Window
Out of Window Letter Date: Not applicable

Funding Year: 7/1/2012 - 6/30/2013
RAL Date: 03/28/2012

Cert. Postmark Date: 03/20/2012

Block 4: Worksheets

Worksheet A No: 1495565

Student Count: 5492

Weighted Product (Sum. Column 8): 4895.1

Shared Discount: 89%

- ✓ 1. Name of School: BURGAW ELEMENTARY SCHOOL
- 2. Entity Number: 29674 NCES: 37 03570 0001
 New School Construction: N Administrative Entity N
- 3. Urban or Rural: Rural
- 4. Total # of Students : 499 5. # of Students Eligible for NSLP: 425
- 6. %Students Eligible for NSLP (#5 / #4): 85.170%
- 7. Discount % from Discount Matrix: 90% 8. Weighted Product for Calculating Share Discount (#4 * #7): 449.1
- 9. Entity Sub-Type: 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: BURGAW MIDDLE SCHOOL
- 2. Entity Number: 29673 NCES: 37 03570 1463
 New School Construction: N Administrative Entity N
- 3. Urban or Rural: Rural
- 4. Total # of Students : 235 5. # of Students Eligible for NSLP: 197
- 6. %Students Eligible for NSLP (#5 / #4): 83.829%
- 7. Discount % from Discount Matrix: 90% 8. Weighted Product for Calculating Share Discount (#4 * #7): 211.5
- 9. Entity Sub-Type: 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: CAPE FEAR ELEMENTARY SCHOOL
- 2. Entity Number: 209643 NCES: 37 03570 0166
 New School Construction: N Administrative Entity N
- 3. Urban or Rural: Rural
- 4. Total # of Students : 511 5. # of Students Eligible for NSLP: 386
- 6. %Students Eligible for NSLP (#5 / #4): 75.538%
- 7. Discount % from Discount Matrix: 90% 8. Weighted Product for Calculating Share Discount (#4 * #7): 459.9
- 9. Entity Sub-Type: 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: CAPE FEAR MIDDLE SCHOOL
- 2. Entity Number: 209644 NCES: 37 03750 0199
 New School Construction: N Administrative Entity N
- 3. Urban or Rural: Rural
- 4. Total # of Students : 475 5. # of Students Eligible for NSLP: 372
- 6. %Students Eligible for NSLP (#5 / #4): 78.315%
- 7. Discount % from Discount Matrix: 90% 8. Weighted Product for Calculating Share Discount (#4 * #7): 427.5
- 9. Entity Sub-Type: 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: HEIDE TRASK HIGH SCHOOL
- 2. Entity Number: 222803 NCES: 37 03750 6855
 New School Construction: N Administrative Entity N
- 3. Urban or Rural: Rural

4. Total # of Students : 672
 5. # of Students Eligible for NSLP: 519
 6. %Students Eligible for NSLP (#5 / #4): 77.232%
 7. Discount % from Discount Matrix: 90%
 8. Weighted Product for Calculating Share Discount (#4 * #7): 604.8
 9. Entity Sub-Type:
 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: MALPASS CORNER ELEMENTARY SCHOOL
 2. Entity Number: 29671
 New School Construction: N
 NCES: 37 03570 895
 Administrative Entity N
 3. Urban or Rural: Rural
 4. Total # of Students : 488
 5. # of Students Eligible for NSLP: 430
 6. %Students Eligible for NSLP (#5 / #4): 88.114%
 7. Discount % from Discount Matrix: 90%
 8. Weighted Product for Calculating Share Discount (#4 * #7): 439.2
 9. Entity Sub-Type:
 10. Alt. Disc. Mech: N

1. Name of School: NORTH TOPSAIL ELEMENTARY SCH
 2. Entity Number: 29695
 New School Construction: N
 NCES:
 Administrative Entity N
 3. Urban or Rural: Rural
 4. Total # of Students : 477
 5. # of Students Eligible for NSLP: 277
 6. %Students Eligible for NSLP (#5 / #4): 58.071%
 7. Discount % from Discount Matrix: 80%
 8. Weighted Product for Calculating Share Discount (#4 * #7): 381.6
 9. Entity Sub-Type:
 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: PENDER COUNTY SCHOOL BOARD
 2. Entity Number: 16030383
 New School Construction: N
 NCES: 37 03570 0000
 Administrative Entity Y
 3. Urban or Rural: Rural
 4. Total # of Students : 0
 5. # of Students Eligible for NSLP: 0
 6. %Students Eligible for NSLP (#5 / #4):
 7. Discount % from Discount Matrix: 83%
 8. Weighted Product for Calculating Share Discount (#4 * #7): 0
 9. Entity Sub-Type:
 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: PENDER EARLY COLLEGE HIGH SCHOOL
 2. Entity Number: 16038944
 New School Construction: N
 NCES: 37 03570 196
 Administrative Entity N
 3. Urban or Rural: Rural
 4. Total # of Students : 211
 5. # of Students Eligible for NSLP: 159
 6. %Students Eligible for NSLP (#5 / #4): 75.355%
 7. Discount % from Discount Matrix: 90%
 8. Weighted Product for Calculating Share Discount (#4 * #7): 189.9
 9. Entity Sub-Type:
 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: PENDER HIGH SCHOOL
 2. Entity Number: 29672
 New School Construction: N
 NCES: 37 03570 1466
 Administrative Entity N
 3. Urban or Rural: Rural
 4. Total # of Students : 630
 5. # of Students Eligible for NSLP: 486
 6. %Students Eligible for NSLP (#5 / #4): 77.142%
 7. Discount % from Discount Matrix: 90%
 8. Weighted Product for Calculating Share Discount (#4 * #7): 567
 9. Entity Sub-Type:
 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: PENDERLEA ELEMENTARY SCHOOL
 2. Entity Number: 29748
 New School Construction: N
 NCES: 37 03570 01467
 Administrative Entity N

- 3. Urban or Rural: Rural
- 4. Total # of Students : 542
- 5. # of Students Eligible for NSLP: 407
- 6. %Students Eligible for NSLP (#5 / #4): 75.092%
- 7. Discount % from Discount Matrix: 90%
- 8. Weighted Product for Calculating Share Discount (#4 * #7): 487.8
- 9. Entity Sub-Type:
- 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: ROCKY POINT ELEMENTARY SCHOOL
- 2. Entity Number: 29715
- NCES:
- New School Construction: N
- Administrative Entity N
- 3. Urban or Rural: Rural
- 4. Total # of Students : 516
- 5. # of Students Eligible for NSLP: 432
- 6. %Students Eligible for NSLP (#5 / #4): 83.720%
- 7. Discount % from Discount Matrix: 90%
- 8. Weighted Product for Calculating Share Discount (#4 * #7): 464.4
- 9. Entity Sub-Type:
- 10. Alt. Disc. Mech: N

- ✓ 1. Name of School: WEST PENDER MIDDLE SCHOOL
- 2. Entity Number: 29670
- NCES: 37 03570 1471
- New School Construction: N
- Administrative Entity N
- 3. Urban or Rural: Rural
- 4. Total # of Students : 236
- 5. # of Students Eligible for NSLP: 200
- 6. %Students Eligible for NSLP (#5 / #4): 84.745%
- 7. Discount % from Discount Matrix: 90%
- 8. Weighted Product for Calculating Share Discount (#4 * #7): 212.4
- 9. Entity Sub-Type:
- 10. Alt. Disc. Mech: N

[Previous](#)

[Display Entire Application](#)



Universal Service Administrative Company

Schools and Libraries Division

FORM 471 RECEIPT ACKNOWLEDGMENT LETTER
(Funding Year 2012: 07/01/2012 - 06/30/2013)

March 28, 2012

John Hughes
PENDER COUNTY SCHOOL DISTRICT
1 Valentine Lane
Chapel Hill, NC 27516

Re: Form 471 Application Number: 836862
Funding Year 2012: 07/01/2012 - 06/30/2013
Applicant's Form Identifier: 2012 P2 redo
Billed Entity Number: 127007

Your certified FCC Form 471, "Services Ordered and Certification Form," requested \$416,005.37 in total Schools and Libraries Program (Program) pre-discount costs for services. A copy of this information has been provided to the service provider(s) whose Service Provider Identification Number(s) (SPIN) is featured on this Form 471.

USAC provides a separate Form 471 Receipt Acknowledgment Letter (RAL) with a RAL Funding Requests Report (Report) for each application certified within the application window. The Report summarizes the information provided to USAC. A space is provided for you to make allowable corrections to any clerical errors or errors that you realize may result in reduction or denial of funding. USAC will perform a complete analysis before funds are committed. If additional errors are found during our review we will attempt to contact you for clarification before making a decision that results in denials or reductions.

Review this Report to verify that the information accurately reflects your request. If the information is accurate, file this letter with your records.

DO NOT SEND CORRECTIONS TO THE CLIENT SERVICE BUREAU. To make corrections, please do the following:

- Corrections may be made until a Funding Commitment Decision Letter for this Form 471 Application is issued.
- If you would like to request a correction to a field that does not appear in the attached Report, print a copy of your Form 471 and clearly note your requested correction.
- If contact information provided above is incorrect, note any correction above and submit a signed copy of this page as a correction.
- Indicate any corrections you wish to make in the Report in the spaces indicated.
- Sign where indicated, and provide your name, title, contact information and date.
- Submit a copy of your marked-up RAL to the email address, fax number or mailing address posted in the "Form 471 RAL" page of our website.
- Retain a copy of the RAL and any submitted corrections.

REMINDERS REGARDING THE RAL

- This letter does NOT contain any decisions concerning your requests for discounts.
- Funding requests that did not pass Minimum Processing Standards are not included in the Report following this letter.
- See "Guide to USAC Letter Reports" posted in the Reference Area of our website for a description of each individual field in the following Report.

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

Form 471 836862 RAL Funding Requests Report

Block 4

THIS REPORT DOES NOT CONTAIN ANY DECISIONS CONCERNING YOUR REQUESTS FOR DISCOUNTS.

USE THIS REPORT TO LIST OR INDICATE CORRECTIONS YOU WISH TO MAKE TO YOUR FORM 471.

Follow the guidance posted on the Form 471 RAL page on our website to make allowable corrections. All corrections - including corrections to new fields - are subject to review for Program compliance and approval.

Corrections Submitted by:

Signature: J. Hughes Date: 7/20/2012

Printed Name: J. Hughes

Title: Consultant

Email, Fax Number or Phone Number: jhughes@newhopetech.org
919.968.4332 (O) 919.929.9074 (F)

Item	Data Entered on FCC Form 471	Make Corrections Here
------	------------------------------	-----------------------

1a. Name of Billed Entity	PENDER COUNTY SCHOOL DISTRICT	Corrections not allowed
3. Billed Entity Number	127007	Corrections not allowed
6. Contact Person's Name	John Hughes	
6. Preferred mode of contact	Email	
6c. Contact Phone	919-968-4332	
6d. Contact Fax	919-929-9074	
6e. Email	jhughes@newhopetech.org	
6f. Holiday/vacation/summercontact information - if provided		

6g. Consultant Name	New Hope Technology Foundation
Consultant Number	16054699
Consultant Employer	New Hope Technology Foundation

The Billed Entity name, address, phone and fax numbers cannot be changed via the RAL correction process.

Form 471 836862 RAL Funding Requests Report

FRN: 2388626

IF YOU WISH TO CANCEL THIS FRN, PLEASE CHECK HERE _____



Item #	Data Entered on FCC Form 471	Make Corrections Here
11. Category of Service	Internal Connections	
12. 470 App#	779540001019117	
13. SPIN	143027887	
14. Service Provider Name	Enterprise Systems Corporation	
15b. Contract Number	N/A	
16a. Billing Account Number	910-259-2187	
16b. Multiple Billing Account Numbers	N	
18. Contract Award Date	03/20/2012	
19. Service Start Date	07/01/2012	
20a. Service End Date		
20b. Contract Expiration Date	09/30/2013	
22. Block 4 Entity or Worksheet No	1495565	
23a. Monthly Charges	\$0.00	
23b. Ineligible Monthly Amt	\$0.00	
23c. Eligible Monthly Amt	\$0.00	
23d. Number of months of service	12	
23e. Annual Pre-discount Amount for eligible recurring charges	\$.00	Calculated - Not Input
23f. Annual Non-Recurring (One-Time) Charges	\$416,005.37	
23g. Ineligible Non-Recurring Amount	\$0.00	
23h. Annual Pre-discount Amount for eligible Non-Recurring charges	\$416,005.37	Calculated - Not Input
23i. Total Pre-discount Amt	\$416,005.37	Calculated - Not Input
23j. Discount from Block 4	89	See Block 4 Above
23k. Funding Commitment Request	\$370,244.78	Calculated - Not Input
25f. Service provider assistance with funding	No	

Exhibit 6


John Hughes

From: John Hughes
Sent: Monday, October 08, 2012 6:45 PM
To: 'Herbst, Gary'
Subject: RE: RAL Change/Appeal of FY2012 FCC Form #8356862, FRN #2388626--Pender County School District

Attachments: 471 Data Entry.xlsx

Our answers to your questions are in red below. Please let me know if you need anything further.

John Hughes

O - (919)968-4332

M - (919)593-2841

F - (919)929-9074

Go Heels!

From: Herbst, Gary [mailto:Gary.HERBST@sl.universalservice.org]
Sent: Thursday, October 04, 2012 4:17 PM
To: John Hughes; 'John Hughes@1-919-929-9074'
Cc: Barry.pace@dpi.nc.gov
Subject: RAL Change/Appeal of FY2012 FCC Form #8356862, FRN #2388626--Pender County School District

Dear John Hughes:

Response Due Date: October 11, 2012

You were recently sent a written request for additional information needed by the Program Compliance team in order to process your Appeal/RAL Change Request of FY2012 FCC Form 471 #836862. This is a reminder that the response due date is approaching. To date, none of the requested information has been received. The information needed to complete the review is listed below.

We received your request to update Block #4 (and/or Block #5/Item #22) of Form 471 #836862, FRN #2388626. However, your request was incomplete. Please provide all of the information below in order for your request to be reviewed:

1. Indicate your revision to the dollars requested based on the share of FRN #2388626 for North Topsail Elementary School. If there are no dollars associated with North Topsail Elementary School, you must provide an explanation of why not.
2. Provide source documentation used at the time of filing of your Form 471 indicating the entities that were scheduled to receive service on FRN #2388626. Examples of source documentation are contracts that cite all recipients of service, contract amendments documenting additional service to the entity in question, vendor quotes citing locations where products will be installed, RFPs etc.
3. Program rules have changed effective with FY2005 for the funding of Internal Connections. Starting in FY2005, eligible entities will only be able to receive support for Internal Connections in two of every five

10/8/2012

funding years. For each eligible entity, the five-year period begins in any year, starting with FY2005, in which that entity receives support for Internal Connections. Further information about the "Two in Five Rule" for Internal Connections can be found at http://www.universalservice.org/res/documents/sl/pdf/about_outreach/tip-sheet-two-in-five-rule.pdf.

ANSWER:

The requirements for correcting a Ministerial & Clerical Error are very straightforward according to the SLD guidance found at <http://www.universalservice.org/sl/applicants/step02/clerical-errors.aspx>. They are copied in red below from the foregoing citation:

Ministerial and clerical (M&C) errors are defined as data entry errors or mistakes applicants made on the FCC Form 470 or FCC Form 471. "Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error." (Order FCC 11-60, released April 14, 2011). USAC can process requests to correct M&C errors up until the time that a Funding Commitment Decision Letter (FCDL) is issued.

Allowable Corrections

- Spelling errors
- Simple addition, subtraction, multiplication or division errors
- Transposed letters and/or numbers
- Misplaced decimal points
- Other punctuation marks (hyphens, periods, commas, etc.) included or not included or misplaced
- Failing to enter an item from the source list (e.g., NSLP data, uploaded Block 4 data, FRN, etc.)
- Incorrect citations such as:
 - FCC Form 470 number
 - Discount percent
 - Urban/rural status
 - Contract number
 - Billing Account Number/Multiple Billing Account Numbers
 - FCC Form 471 Block 4 worksheet entries
- Updates or changes to contact person and/or consultant information
- Errors in dollars figures on an FRN
- Adding or removing entities accidentally omitted or included in FCC Form 471 Block 4
- Accidental omission of FRNs from the FCC Form 471
- Changing the amount budgeted for ineligible services (Item 25d, "necessary resources") in FCC Form 471 Block 6
- Changing the service delivery time period (e.g., month-to-month to contractual, recurring to non-recurring)
- Mis-keying the Service Provider Identification Number (SPIN) or Service Provider Name
- Corrective SPIN changes
- Correcting the annual charges for recurring charges
- Incorrectly identifying ineligible charges and/or services or products

Requests to correct M&C errors should be submitted to USAC as soon as the errors are detected by the applicant. USAC will accept and process requests until an FCDL is issued.

In this case we were indeed "removing (an) entit(y)ies accidentally.....included in FCC From 471 Block 4". We also submitted the errors to USAC as soon as they were detected and before the FCDL was issued. We therefore complied with the requirements of the guidance.

Further I am providing you with the input documents that we used from which we made an error that is best described as the "kind of error that a typist might make when entering data from one list to another".

Just to be clear we created two lists of entities when we started to complete our 471's for FY 2012.....one for the Priority 1 application and one for the Priority 2 application. A copy of the two workbooks used for the FY 2012 applications contained in the file is attached (see attached "471 Data Entry.xlsx"). We entered the entities contained in the tab entitled "Priority 1 2012" when we populated Block 4 of the Priority 1 application and should have entered the entities contained in the tab entitled "Priority 2 2012" when we populated Block 4 of the Priority 2 application (application 836862 and the application in question in this review). We mistakenly uploaded the FY 2011 data instead of the FY 2012 data. We made a clerical typist error as described in the first paragraph of the guidance quoted above in red by not entering the correct list. The list in itself should suffice to prove that our assertion is correct and meets the criteria as outlined in the guidance.

In many cases, the PIA reviewer can determine whether the correction is allowable and, if so, complete the correction without requesting additional information. However when the nature of the correction is not apparent to the PIA reviewer, the PIA reviewer may request the appropriate source documentation to determine whether the correction is allowable. Source documentation is the documentation containing the information used to prepare the form (e.g., Item 21 Attachment, contract, vendor quote, NSLP data, etc.).

The fact that we have submitted the input documents that we used to populate Block 4 of the application should be adequate to conclude that we make a clerical error and should satisfy the requirement above, i.e. (e.g., Item 21 Attachment, contract, vendor quote, NSLP data, etc.).

I respectfully submit that we have satisfied all the requirements of the guidance listed at <http://www.universalservice.org/sl/applicants/step02/clerical-errors.aspx> and ask that you process our RAL as submitted.

Please fax or e-mail the requested information to my attention. If you have any questions please feel free to contact me.

It is important that we receive all of the information requested so we can complete our review.

If we do not receive the information within 15 calendar days, your application will be reviewed using the information currently on file. If you need additional time to prepare your response, please let me know as soon as possible.

Should you wish to cancel this application, or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s); along with the application number and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

A copy of this letter is being sent to the North Carolina E Rate Coordinator for informational purposes.

Thank you in advance for your valuable time in this matter.

Sincerely,

Gary Herbst
Associate Manager, Program Compliance
30 Lanidex Plaza West | Parsippany, NJ 07054
T: 973.581.5144 | F: 973.599.6525
g Herbst@sl.universalservice.org

10/8/2012

Confidentiality Notice: *The information in this e-mail and any attachments thereto is intended for the named recipient(s) only. This e-mail, including any attachments, may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is **STRICTLY PROHIBITED**. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.*

10/8/2012



"There is nothing more important than our customers."

QUOTATION

Quote: ETS-0101203
 Quote Name: PCS Base - Pender
 Issued Date: 3/15/2012
 Quote Rev: 3

Currency: USD
 Quote Type: Standard Quote
 Quote Valid Through: 12/28/2012

Exchange rate: 1
 Terms:

Sales Team	
Sales Contact: Larry Cothorn	Sales Contact: Henry Hartman
Company: Enterprise Systems	Company: Enterasys Networks
Phone:	Phone: (919) 303-7730
Cell:	Cell: (919) 656-4157
Email: lcothorn@enter-sys.com	Email: hhartman@enterasys.com

Quote To: Pender County Schools
 925 Penderlea Hwy
 Burgaw,NC 28425
Contact: Landon Scism
Phone: (910) 259-2187
Cell:
Fax: (910) 259-0133

#	Part Number	Qty	Description	List Price	Net Price	Extended Net Price
Board of Education						
1	C5G124-48	2	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$5,544.20
2	C5G124-48P2	2	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 8,995.00	\$3,418.10	\$6,836.20

3	MGBIC-LC01	11	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$2,069.10
4	B5G124-24P2	3	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$4,098.30
5	B5G124-48	1	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$1,746.10
6	B5G124-48P2	3	B5 (48) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 5,995.00	\$2,278.10	\$6,834.30
7	STK-CAB-LONG	1	1M STACKING CABLE - B5/C5 ONLY	\$ 250.00	\$95.00	\$95.00
8	STK-CAB-SHORT	5	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$380.00
9	PS-ESU-1	1	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$2,500.00
Equipment Subtotal						\$27,603.20
Installation and Configuration Subtotal						\$2,500.00

Burgaw Elementary

10	C5G124-48	2	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$5,544.20
11	C5G124-48P2	1	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 8,995.00	\$3,418.10	\$3,418.10
12	MGBIC-LC01	8	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$1,504.80
13	B5G124-24P2	1	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$1,366.10

14	B5G124-48	6	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$10,476.60
15	B5G124-48P2	2	B5 (48) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 5,995.00	\$2,278.10	\$4,556.20
16	STK-CAB-LONG	2	1M STACKING CABLE - B5/C5 ONLY	\$ 250.00	\$95.00	\$190.00
17	STK-CAB-SHORT	7	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$532.00
18	PS-ESU-1	1	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$2,500.00
Equipment Subtotal						\$27,588.00
Installation and Configuration Subtotal						\$2,500.00

Burgaw Middle

19	C5G124-48	2	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$5,544.20
20	C5G124-48P2	1	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 8,995.00	\$3,418.10	\$3,418.10
21	MGBIC-LC01	8	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$1,504.80
22	B5G124-24P2	2	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$2,732.20
23	B5G124-48	4	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$6,984.40
24	STK-CAB-LONG	1	1M STACKING CABLE - B5/C5 ONLY	\$ 250.00	\$95.00	\$95.00

25	STK-CAB-SHORT	6	30CM STACKING CABLE - B5/C5 ONLY	\$200.00	\$76.00	\$456.00
26	PS-ESU-1	1	Installation and Configuration Services	\$2,500.00	\$2,500.00	\$2,500.00
Equipment Subtotal						\$20,734.70
Installation and Configuration Subtotal						\$2,500.00

Cape Fear Elementary

27	C5G124-48	1	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$7,295.00	\$2,772.10	\$2,772.10
28	C5G124-48P2	1	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$8,995.00	\$3,418.10	\$3,418.10
29	MGBIC-LC01	2	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$495.00	\$188.10	\$376.20
30	B5G124-48	5	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$4,595.00	\$1,746.10	\$8,730.50
31	B5G124-48P2	1	B5 (48) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$5,995.00	\$2,278.10	\$2,278.10
32	STK-CAB-LONG	1	1M STACKING CABLE - B5/C5 ONLY	\$250.00	\$95.00	\$95.00
33	STK-CAB-SHORT	7	30CM STACKING CABLE - B5/C5 ONLY	\$200.00	\$76.00	\$532.00
34	PS-ESU-1	1	Installation and Configuration Services	\$2,500.00	\$2,500.00	\$2,500.00
Equipment Subtotal						\$18,202.00
Installation and Configuration Subtotal						\$2,500.00

Cape Fear Middle

35	C5G124-48	1	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$2,772.10
36	C5G124-48P2	1	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 8,995.00	\$3,418.10	\$3,418.10
37	MGBIC-LC01	7	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$1,316.70
38	B5G124-24P2	1	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$1,366.10
39	B5G124-48	6	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$10,476.60
40	B5G124-48P2	1	B5 (48) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 5,995.00	\$2,278.10	\$2,278.10
41	STK-CAB-LONG	1	1M STACKING CABLE - B5/C5 ONLY	\$ 250.00	\$95.00	\$95.00
42	STK-CAB-SHORT	8	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$608.00
43	PS-ESU-1	1	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$2,500.00
Equipment Subtotal						\$22,330.70
Installation and Configuration Subtotal						\$2,500.00

Heide Trask High

44	C5G124-48	2	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$5,544.20
----	-----------	---	--	-------------	------------	------------

45	C5G124-48P2	2	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 8,995.00	\$3,418.10	\$6,836.20
46	MGBIC-LC01	17	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$3,197.70
47	B5G124-48	15	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$26,191.50
48	B5G124-48P2	5	B5 (48) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 5,995.00	\$2,278.10	\$11,390.50
49	B5G124-24	2	B5 (24) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 2,795.00	\$1,062.10	\$2,124.20
50	B5G124-24P2	1	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$1,366.10
51	STK-CAB-LONG	6	1M STACKING CABLE - B5/C5 ONLY	\$ 250.00	\$95.00	\$570.00
52	STK-CAB-SHORT	21	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$1,596.00
53	PS-ESU-1	2	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$5,000.00
Equipment Subtotal						\$58,816.40
Installation and Configuration Subtotal						\$5,000.00

Malpass Corner

54	C5G124-48	3	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$8,316.30
55	C5G124-48P2	2	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 8,995.00	\$3,418.10	\$6,836.20

56	MGBIC-LC01	5	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$940.50
57	B5G124-48	3	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$5,238.30
58	B5G124-48P2	2	B5 (48) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 5,995.00	\$2,278.10	\$4,556.20
59	STK-CAB-LONG	2	1M STACKING CABLE - B5/C5 ONLY	\$ 250.00	\$95.00	\$190.00
60	STK-CAB-SHORT	8	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$608.00
61	PS-ESU-1	1	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$2,500.00

Equipment Subtotal

\$26,685.50

Installation and Configuration Subtotal

\$2,500.00

Pender Early College

70	C5G124-48	1	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$2,772.10
71	C5G124-48P2	3	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 8,995.00	\$3,418.10	\$10,254.30
72	MGBIC-LC01	5	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$940.50
73	B5G124-24	2	B5 (24) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 2,795.00	\$1,062.10	\$2,124.20
74	D2G124-12-POL	1	12 PORT 10/100/1000 SWITCH WITH POLICY	\$ 1,690.00	\$642.20	\$642.20

75	STK-CAB-SHORT	2	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$152.00
76	PS-ESU-1	1	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$2,500.00
Equipment Subtotal						\$16,885.30
Installation and Configuration Subtotal						\$2,500.00

Pender High

77	C5G124-48	2	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed	\$ 7,295.00	\$2,772.10	\$5,544.20
78	C5G124-48P2	5	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high	\$ 8,995.00	\$3,418.10	\$17,090.50
79	MGBIC-LC01	18	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$3,385.80
80	B5G124-48	8	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$13,968.80
81	B5G124-24	3	B5 (24) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 2,795.00	\$1,062.10	\$3,186.30
82	B5G124-24P2	4	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$5,464.40
83	STK-CAB-LONG	4	1M STACKING CABLE - B5/C5 ONLY	\$250.00	\$95.00	\$380.00
84	STK-CAB-SHORT	20	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$1,520.00
85	PS-ESU-1	3	Installation and Configuration Services	\$2,500.00	\$2,500.00	\$7,500.00

			Equipment Subtotal			\$50,540.00
			Installation and Configuration Subtotal		\$7,500.00	

Penderlea

86	C5G124-48	2	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$5,544.20
87	MGBIC-LC01	9	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$1,692.90
88	B5G124-48	3	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$5,238.30
89	B5G124-24	1	B5 (24) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 2,795.00	\$1,062.10	\$1,062.10
90	B5G124-24P2	2	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$2,732.20
91	STK-CAB-SHORT	6	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$456.00
92	PS-ESU-1	1	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$2,500.00
			Equipment Subtotal			\$16,725.70
			Installation and Configuration Subtotal		\$2,500.00	

Rocky Point

101	C5G124-48	2	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed	\$ 7,295.00	\$2,772.10	\$5,544.20
102	C5G124-48P2	3	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high	\$ 8,995.00	\$3,418.10	\$10,254.30

103	MGBIC-LC01	10	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$1,881.00
104	B5G124-48	4	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$6,984.40
105	B5G124-48P2	6	B5 (48) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2)dedicated stacking ports and external RPS connector	\$ 6,995.00	\$2,278.10	\$13,668.60
106	B5G124-24	1	B5 (24) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 2,795.00	\$1,062.10	\$1,062.10
107	B5G124-24P2	1	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$1,366.10
108	STK-CAB-LONG	2	1M STACKING CABLE - B5/C5 ONLY	\$ 250.00	\$95.00	\$190.00
109	STK-CAB-SHORT	12	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$912.00
110	PS-ESU-1	2	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$5,000.00
Equipment Subtotal						\$41,862.70
Installation and Configuration Subtotal						\$5,000.00

West Pender

146	C5G124-48	1	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$2,772.10
147	C5G124-48P2	1	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 8,995.00	\$3,418.10	\$3,418.10
148	MGBIC-LC01	7	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550 M, LC SFP	\$ 495.00	\$188.10	\$1,316.70

149	B5G124-48	3	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$5,238.30
150	B5G124-24P2	3	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$4,098.30
151	STK-CAB-SHORT	8	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$608.00
152	PS-ESU-1	1	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$2,500.00
Equipment Subtotal						\$17,451.50
Installation and Configuration Subtotal						\$2,500.00

E-rate Equipment Summary

155	C5G124-48	21	C5 (48) 10/100/1000 RJ45 ports , (4) combo SFP ports, (2) high speed dedicated stacking ports and external RPS connector	\$ 7,295.00	\$2,772.10	\$58,214.10
156	C5G124-48P2	22	C5 (48) 10/100/1000 AT-PoE RJ45 ports , (4) combo SFP ports, (2) high	\$ 8,995.00	\$3,418.10	\$75,198.20
157	MGBIC-LC01	107	1 Gb, 1000Base-SX, IEEE 802.3 MM, 850 nm Short Wave Length, 220/550	\$ 495.00	\$188.10	\$20,126.70
158	B5G124-48	58	B5 (48) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 4,595.00	\$1,746.10	\$101,273.80
159	B5G124-48P2	20	B5 (48) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 5,995.00	\$2,278.10	\$45,562.00
160	B5G124-24	9	B5 (24) 10/100/1000 RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 2,795.00	\$1,062.10	\$9,558.90
161	B5G124-24P2	18	B5 (24) 10/100/1000 AT-POE RJ45 ports, (4) combo SFP ports, (2) dedicated stacking ports and external RPS connector	\$ 3,595.00	\$1,366.10	\$24,589.80

162	STK-CAB-LONG	20	1M STACKING CABLE - B5/C5 ONLY	\$ 250.00	\$95.00	\$1,900.00
163	STK-CAB-SHORT	110	30CM STACKING CABLE - B5/C5 ONLY	\$ 200.00	\$76.00	\$8,360.00
164	D2G124-12-POL	1	12 PORT 10/100/1000 SWITCH WITH POLICY	\$ 1,690.00	\$642.20	\$642.20
165	PS-ESU-1	16	Installation and Configuration Services	\$ 2,500.00	\$ 2,500.00	\$40,000.00

	Product Subtotal	\$345,425.70
	Maintenance Subtotal	
	Installation and Configuration Services Subtotal	\$40,000.00
	E-rate Eligible Total	\$385,425.70
	Sales Tax	\$ 30,579.67
	Total	\$416,005.37



50 Minuteman Road
Andover, MA 01810
(978)-684-1000

Delivering on our promises. On-time. On-budget.

Pender County Schools
 Priority 1 471
 FY 2011

School Name	BEN	Enrollment	Responses	NLSP Eligible	%	Projected NSLP	Discount	Survey
Burgaw Elementary	29674	499	441	376	85%	425	90%	Yes
Burgaw Middle School	29673	235	212	178	84%	197	90%	Yes
Cape Fear Elementary	209643	511	496	375	76%	386	90%	Yes
Cape Fear Middle	209644	475	442	346	78%	372	90%	Yes
Heide Trask High School	222803	672	578	446	77%	519	90%	Yes
Malpass Corner Elementary	29671	488	379	334	88%	430	90%	Yes
North Topsail Elementary	29695	477	449	261	58%	277	80%	Yes
Pender Early College High	16038944	211	138	104	75%	159	90%	Yes
Pender High School	29672	630	416	321	77%	486	90%	Yes
Penderlea Elementary	29748	542	369	277	75%	407	90%	Yes
Rocky Point Elementary	29715	516	483	404	84%	432	90%	Yes
South Topsail Elementary	16057267	494	461	178	39%	191	70%	Yes
Topsail Elementary	29698	510	508	251	49%	252	70%	Yes
Topsail High School	29696	1059	910	404	44%	470	70%	Yes
Topsail Middle School	29697	834	806	398	49%	412	70%	Yes
West Pender Middle	29670	236	215	182	85%	200	90%	Yes
County Board	16030383	0		0		0%	83%	NIF

Pender County Schools
 Priority 2 471
 FY 2011

School Name	BEN	Enrollment	Responses	NLSP Eligible	%	Projected NSLP	Discount	Survey
Burgaw Elementary	29674	499	441	376	85%	425	90%	Yes
Burgaw Middle School	29673	235	212	178	84%	197	90%	Yes
Cape Fear Elementary	209643	511	496	375	76%	386	90%	Yes
Cape Fear Middle	209644	475	442	346	78%	372	90%	Yes
Heide Trask High School	222803	672	578	446	77%	519	90%	Yes
Malpass Corner Elementary	29671	488	379	334	88%	430	90%	Yes
North Topsail Elementary	29695	477	449	261	58%	277	80%	Yes
Pender Early College High	16038944	211	138	104	75%	159	90%	Yes
Pender High School	29672	630	416	321	77%	486	90%	Yes
Penderlea Elementary	29748	542	369	277	75%	407	90%	Yes
Rocky Point Elementary	29715	516	483	404	84%	432	90%	Yes
West Pender Middle	29670	236	215	182	85%	200	90%	Yes
County Board	16030383	0		0		0%	83%	NIF

Exhibit 7

Pender County Schools
 Priority 1 471
 FY 2012

School Name	BEN	Enrollment	Responses	NLSP Eligible	%	Projected NSLP	Discount	Survey
Burgaw Elementary	29674	499	441	376	85%	425	90%	Yes
Burgaw Middle School	29673	235	212	178	84%	197	90%	Yes
Cape Fear Elementary	209643	511	496	375	76%	386	90%	Yes
Cape Fear Middle	209644	475	442	346	78%	372	90%	Yes
Heide Trask High School	222803	672	578	446	77%	519	90%	Yes
Malpass Corner Elementary	29671	488	379	334	88%	430	90%	Yes
North Topsail Elementary	29695	477	449	261	58%	277	80%	Yes
Pender Early College High	16038944	211	138	104	75%	159	90%	Yes
Pender High School	29672	630	416	321	77%	486	90%	Yes
Penderlea Elementary	29748	542	369	277	75%	407	90%	Yes
Rocky Point Elementary	29715	516	483	404	84%	432	90%	Yes
South Topsail Elementary	16057267	494	461	178	39%	191	70%	Yes
Topsail Elementary	29698	510	508	251	49%	252	70%	Yes
Topsail High School	29696	1059	910	404	44%	470	70%	Yes
Topsail Middle School	29697	834	806	398	49%	412	70%	Yes
West Pender Middle	29670	236	215	182	85%	200	90%	Yes
County Board	16030383	0		0		0%	83%	NIF

Exhibit 7

Pender County Schools
 Priority 2 471
 FY 2012

School Name	BEN	Enrollment	Responses	NLSP Eligible	%	Projected NSLP	Discount	Survey
Burgaw Elementary	29674	499	441	376	85%	425	90%	Yes
Burgaw Middle School	29673	235	212	178	84%	197	90%	Yes
Cape Fear Elementary	209643	511	496	375	76%	386	90%	Yes
Cape Fear Middle	209644	475	442	346	78%	372	90%	Yes
Heide Trask High School	222803	672	578	446	77%	519	90%	Yes
Malpass Corner Elementary	29671	488	379	334	88%	430	90%	Yes
Pender Early College High	16038944	211	138	104	75%	159	90%	Yes
Pender High School	29672	630	416	321	77%	486	90%	Yes
Penderlea Elementary	29748	542	369	277	75%	407	90%	Yes
Rocky Point Elementary	29715	516	483	404	84%	432	90%	Yes
West Pender Middle	29670	236	215	182	85%	200	90%	Yes
County Board	16030383	0		0		0%	83%	NIF