

May 2, 2013

Federal Communications Commission
Office of the secretary
445 12th Street, SW
Room TW-A325
Washington DC 20554

Appeal – CC Docket 96-45 and 02-6

USAC Appeal Decision Date: January 18, 2013
Form 471 Number: 812790
FRN Numbers: 2230868, 2217045 and 2230831
Funding Year: 2011
Billed Entity Name: Springfield Public Schools
BEN: 136699
Service Providers, respectively: ATT Mobility, Office of Public Utilities and United Communications
SPIN Numbers respectively: 143025240, 143004961 and 143003866

Contact Information:

Name: Joseph Bascio
Interim Director of Business Services
Address: 1900 West Monroe
Springfield, IL 62704
Phone: 217-525-3040
Fax: 217-525-7910
e-mail: jbasccio@sps186.org

Funding Commitment Decision Letter: The Funding Commitment Decision Letter is dated April 11, 2012. A Form 486 had been filed on October 17, 2012. The Service Start Date is June 19, 2012.

Requested Action: We request that USAC reconsider our application and grant approval to a Service Start Date of 07/01/2011 after reviewing the following statements.

Our basis for this appeal:

We had written an appeal to USAC on January 2, 2013. USAC denied it on January 18, 2013. The first issue is to request a waiver of the 60 days that is typically granted to applicants to file an appeal. The contact person is no longer with the district so we did not receive the appeal notice in that 60 day window. As you can see, this request for a waiver is a result of the reorganization in district personnel. It ties in with the initial request below to waive the 120 day rule for filing the Form 486.

We are presenting no new evidence here. We are simply escalating our original arguments to the FCC Appeal level. The basis of the appeal is the reorganization of staff in the district. In 2011 the Director of Business Services oversaw the erate program for Springfield School District 186. Four administrative people left the district either as a result of retirement or incompetence. It was not until late summer of 2012 that a new team had been assembled to drive the needs of the district, with erate being one of the critical components. Now the staff includes the Director of Technology, the Manager of Data and Information Systems, the Administrative Assistant for Technology, the Interim Director of Business Services and the Purchasing Director. There have been a number of role changes and two other people have been appointed to assist in the erate process from the district. Subsequently, the district hired BTU Consultants in October, 2012 to oversee the erate program. BTU Consultants pointed out that the Form 486 was late in being filed for Funding Year 2011. The Form was filed on October 17, 2012 and the Service Start date was posted as June 19, 2012. This appeal is to request approval for a Service Start Date of 7/1/2011 as a result of complete upper management reorganization at the end of the Funding Year 2011.

Summary:

The SLD's current Service Start date of June 19, 2012 would mean that the district would receive approximately 1/24 of the requested funds of \$237,044.00. This represents a significant out of pocket loss to the district. Springfield School District 186 would make good use of those dollars for the students in the district. You can see that the district was operating on "automatic pilot" before new administrative people had been appointed. The district has indicated its commitment to the erate program by hiring an outside consultant so that the erate program does not "fall through the cracks". Springfield School District 186 would appreciate consideration for USAC to move the Service Start Date to July 1, 2011. We request that the SLD re-consider this application based on the evidence included in this appeal.

Thank you.

Sincerely,

(filed electronically via SLD website)

Joseph Bascio

Interim Director of Business Services

Springfield School District 186

Phone: 217-525-3040

Email: jbascio@sps186.org

Attachment below:

1. SLD appeal filed January 2, 2013
2. USAC denial response to the SLD appeal – *we do not have a copy of it because the contact person has left. We learned of this through the SDL Hotline.*

Filed: January 2, 2013

Contact Information:

Name: Susan Ruff
Director of Technology
Address: 1900 West Monroe
Springfield, IL 62704
Phone: 217-525-3015
Fax: 217-525-7910
e-mail: sruff@sps186.org

SLD Action being appealed: This is an appeal in regard to the Service Start Date of June 19, 2012 for the Form 486 had been filed for FY 2011 on October 17, 2012. The Funding Commitment Decision Letter is dated April 11, 2012.

School Year:	2012
Applicant Name:	Springfield School District 186
Form 471 Application#:	812790
Billed Entity #:	136699
FRN #:	2230868, 2217045, 2230647 and 2230831.

Funding Commitment Decision Letter:

The Funding Commitment Decision Letter is dated April 11, 2012. A Form 486 had been filed on October 17, 2012. The Service Start Date is June 19, 2012.

Requested Action:

We request that USAC reconsider our application and grant approval to a Service Start Date of 7/1/2011 after reviewing the following statements.

Our basis for this appeal:

The basis of the appeal is the reorganization of staff in the district. In 2011 the Director of Business Services oversaw the erate program for Springfield School District 186. Four administrative people left the district either to retirement or incompetence. It was not until late summer of 2012 that a new team had been assembled to drive the needs of the district, with erate being one of the critical components. Now the staff includes the Director of Technology, the Manager of Data and Information Systems, the Administrative Assistant for Technology, the Business Manager and the Purchasing Director. There have been a number of role changes and two other people have been appointed to assist in the erate process from the district. Subsequently, the district hired BTU Consultants in October, 2012 to oversee the erate program. BTU Consultants pointed out that the Form 486 is late in being filed. The Form was filed on October 17, 2012 and the Service Start date was posted as June 19, 2012. This appeal is to request approval for a Service Start Date of 7/1/2011 as a result of a complete upper management reorganization at the end of the Funding Year 2011.

Summary:

The SLD's current Service Start date of June 19, 2012 would mean that the district would receive approximately 1/24 of the requested funds of \$237,044.00. This represents a significant out of pocket loss to the district. Springfield School District 186 would make good use of those dollars for the students in the district. You can see that the district was operating on "automatic pilot" before new administrative people had been appointed. The district has indicated its commitment to the erate program by hiring an outside consultant so that the erate program does not "fall through the cracks". Springfield School District 186 would appreciate consideration for USAC to move the Service Start Date to July 1, 2011. We request that the SLD re-consider this application based on the evidence included in this appeal.

Thank you.

Sincerely,

(filed electronically via SLD website)

Susan Ruff

Director of Technology

Springfield School District 186