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October 8, 2013

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

RE: Reference CC Docket No. 02-6 Request for Reviews and Request for Waivers

Appellant/BEN: Sno-Isle Rural Libraries System, BEN #145230

Contact: Claire O’Flaherty, E-rate Expertise, PO Box 7053, Tacoma, WA 98417-0053
Cell: 253-320-0664, Email: claire@erateexpertise.com

Sno-Isle Rural Libraries has discovered grave errors in the administration of our E-rate program management. Since the beginning of Sno-Isle Libraries’ program participation in 1998, a total of \$1,277,165 in E-rate funds were approved and committed to our rural libraries. Unfortunately, not a single BEAR form was filed for reimbursement during this period of participation due to a senior staff member’s misunderstanding of how such reimbursements were to occur and lack of dedicated time. We have been advised by the USAC Ombudsman to outline the history of our applications and the FCC decisions needed to try to address this very difficult situation. We are requesting your review of the information attached to this letter which includes specific requests for actions/decisions by the FCC.

An internal review of the E-rate program last year discovered our former Administrative Services Director, who managed our E-rate applications, was overwhelmed by many other high priority duties and deadlines within his scope of work. These duties included preparing and managing the budgets for the Sno-Isle Rural Libraries System, preparing financial reports, overseeing the maintenance requirements of our rural library facilities, supervising our accounting, purchasing and payroll functions, managing our treasury requirements, and supervising our mailroom and front desk. Based on a download of data from the USAC database, it

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was determined that several 486 forms were not filed over the years; and to this date, we have been unable to locate relevant computer or hard copy files. It is our belief this senior staff member assumed vendor's bills reflected E-rate discount amounts and therefore he did not file required BEAR forms and did not understand USAC PIA inquiry requests. A conclusion of the internal review is that this former staff member did not have the dedicated time and apparently lacked the knowledge necessary to effectively manage our E-rate applications.

We worked with the USAC Ombudsman to obtain copies of the forms filed and some of the correspondence between our Library and USAC. The attached Funding History Report shows the 471 Application numbers, whether a 486 form was filed, and the requested, committed and disbursed amounts. Note that all of the funding requests and commitments were for Priority 1 items. Our Library has also been CIPA compliant since the time this requirement was enacted.

We have done our best to explain this very complex situation in our documentation. We recognize that more issues or information needs may arise as these documents are reviewed. We are willing to cooperate in every way possible to ensure you get the information you need to fairly evaluate and resolve this unfortunate situation.

We would like to assure you that Sno-Isle Library takes this situation very seriously and we have made several changes to ensure that the program is properly administered in the future. The Library hired a new Administrative Services Director and also an experienced consultant who is dedicated to our E-rate applications. Both the new Administrative Services Director and the IT Manager attended the Fall 2012 USAC Training Seminar. We changed our procedures to ensure that several senior staff members are involved in E-rate decision-making. The 470 and 471 forms for the 2012-13 program year were filed on time and all program rules were strictly followed.

We acknowledge that our former staff member did not understand many of the E-Rate program rules and was overwhelmed with the other duties of his position which resulted in several errors on our past E-rate applications. However, in light of the extreme magnitude of this situation, we ask for your understanding of our predicament and we hope that you can help us reclaim some of these vital funds that were committed to our Library. We firmly believe that there was no intentional misconduct or attempts to defraud the E-rate program. This is a very unfortunate case of human error that has caused great losses to our rural library system and our patrons at a time when the demand for our services is increasing and our funds are

decreasing. We greatly appreciate your careful consideration of our appeal. If you have any questions or need further information, please contact our consultant Claire O'Flaherty at Claire@erateexpertise.com or 253-320-0664.

Sincerely,



Jonalyn Woolf-Ivory
Executive Director
Sno-Isle Rural Libraries



Gary Sitzman
Administrative Services Director
Sno-Isle Rural Libraries

Attachments:

1. Sno-Isle Library E-rate Funding History Report
2. Statement of Facts and Request for Appeals and Waivers
3. 2011 486 Form Electronically Submitted on August 14, 2012
4. 2011 486 Receipt Notification Letter with Revised Start Date
5. 2009 486 Form Signed/Paper Submitted on November 20, 2012
6. 2010 486 Form Signed/Paper Submitted on November 20, 2012
7. Email dated 7/27/11 to Jonalyn Woolf-Ivory confirming funds were received
8. 2011 Invoice Deadline Extension Request
9. 2011 Funding Commitment Decision Letter
10. February, 2012 email correspondence between PIA & Sno-Isle Library re: 2011 application
11. Copy of Frontier Bill Date 01/19/11
12. 2012 Funding Commitment Decision Letter
13. 2005 Funding Commitment Decision Letter
14. LOA between Sno-Isle Library and E-rate Expertise

Sno-Isle Rural Library District E-rate Funding History

FY	471 #	FRNs	Funded	Req Amt	Total Committed	Disbursed	486 Filed
2012	875656	2	0	\$62,778.15	\$0.00	\$0.00	No
2011	821891	2	2	\$109,452.48	\$61,666.08	\$0.00	No*
2010	769113	3	3	\$101,715.31	\$101,715.31	\$0.00	No*
2009	691322	4	4	\$146,712.41	\$146,712.41	\$0.00	No*
2008	637629	4	4	\$151,684.68	\$143,257.76	\$0.00	Yes
2007	586757	4	2	\$317,848.44	\$5,109.00	\$0.00	Yes
2006	538951	4	3	\$190,064.16	\$175,907.84	\$0.00	Yes
2005	489285	5	0	\$165,895.95	\$0.00	\$0.00	No
2004	434583	6	6	\$54,181.43	\$54,181.43	\$0.00	No
2003	382691	5	5	\$146,453.34	\$143,446.13	\$0.00	No
2002	na	0	0	\$0.00	\$0.00	\$0.00	No
2001	266305	4	4	\$158,384.21	\$127,838.38	\$0.00	No
2000	190290	10	10	\$161,799.96	\$144,617.40	\$601.23	Yes
1999	148960	7	7	\$104,902.06	\$104,902.06	\$0.00	Yes for 5 of 7 FRNs
1998	30571; 84254; 85219; 31423	4	4	\$67,811.71	\$67,811.71	\$0.00	Yes
				\$1,939,684.29	\$1,277,165.51		

Dif between Requests and Commits: \$662,518.78

* Notes on 486 Forms:

These 486 forms were filed late after a consultant was hired to correct the situation.

The 486 form for 2011 was filed on 8/14/12 and rec'd a Revised Service Start Date of 4/17/12.

An Invoice Deadline Extension Request for 2011 is still pending with USAC.

The 486 forms for 2010 & 2009 were submitted on 11/20/2012 and denied due to missed deadline.

**Statement of Facts and Requests for Appeal and Waivers
for Sno-Isle Rural Library**

486 Forms:

486 forms were filed for program years 1998-2000 and 2006-2008. We filed 486 forms for 2009 and 2010 on November 20, 2012 and the forms and funding commitments were denied because they were beyond the 486 deadlines for those program years. We filed the 2011 486 form on August 14, 2012 and the Service Start Date was revised to April 17, 2012. We request that the 486 deadlines be waived to allow for the following actions:

1. Change the Revised 2011 Service Start Date to July 1, 2011.
2. Reverse the denial of the 486 forms for 2009 and 2010, with a Service Start Date of July 1st for each program year.
3. Allow the Library to submit 486 forms for program years 2001 and 2003-5 and accept them without modifying the Service Start Dates.

BEAR Forms/Reimbursements:

No BEAR forms were filed for Program Years 1998-2012. One SPI form for \$601.23 was apparently filed by one service provider in 2000. We believe that our former staff member did not understand E-rate program procedures and he thought that discounted rates were automatically being applied to our bills. Whenever he was questioned about the program by our Library Director, IT Manager or outside vendors, he always indicated that everything was on track. Please see the attached email exchanges that support this assertion. On 10/24/12 we submitted an Invoice Deadlines Extension Request for 2011, but we have not heard back from USAC on this request.

1. Waive the Invoicing Deadline for Program Years 1998-2012 so that the library can submit BEAR forms for reimbursements.
2. Accept our Invoice Deadline Extension Request for 2011.

Document Retention Requirements:

We assure you that we have made our best efforts to locate the missing files and computer documents but we have been unsuccessful. We now have copies of all the E-rate forms filed and we have invoices for at least the past seven years.

1. In light of the fact that all of the E-rate files have gone missing, we request the FCC waive the document retention requirements for our participation in the program from 1998-2012.

Contracting Rules:

The former Administrative Services Director never informed other staff members about contracting requirements for the E-rate Program. In a few cases, contracts may have been signed by the IT Manager, but the services were still listed as MTM on the 471 forms and 470 forms were filed each year. Since Sno-Isle is primarily a rural library system, our technology options have been limited to only 1 provider for these services. We corrected this situation by posting a 470 for 2013, waiting the required 28 days, selecting vendors according to program rules, negotiating contracts with start dates of July 1, 2013, and listing the services as Contracted Services on the 471 form.

1. We request the FCC make an allowance for any contracted services listed as MTM on past 471 forms in light of the fact that 470 forms were filed each year and alternative vendors were not available in our service area.

2012-13 Program Year:

In our 471 application for 2012, both funding requests were denied because the referenced 470 form was from the prior program year. The stated reason for denial on the FCDL is: "A FCC Form 470 was not posted for requested tariff or month-to-month services for Funding Year 2012. FCC Rules require that requested tariff or month-to-month services be posted on a FCC Form 470 each Funding Year." At the time of filing this application, our former Administrative Services Director had indicated that he was changing his methods of applying so that he would not have to file 470 forms each year, however, he continued to classify the service as MTM. 470 forms were filed in all program years prior to 2012. We are not aware of him signing any contracts, although as stated previously, a few contracts may have been in place from prior years with the only vendors that can provide services for our system. The former Administrative Services Director clearly did not understand the contracting rules for E-rate and that he needed to file a 470 form each year if it was a MTM service.

1. We request the FCC waive the 470 and contracting requirements for this program year and commit funds to the following FRNs:
 - a. FRN 2390692 for Frontier Communications Northwest, Inc. (SPIN 143004786)
 - b. FRN 2390693 for Whidbey Telephone Company (SPIN 143002608)

2011-12 Program Year:

The FRNs in our 2011 471 application # 821891 were modified by USAC to exclude certain ineligible items. One of the items in FRN # 2238487 with SPIN # 143004786 for Frontier Communications was modified "to remove the ineligible products/service...Advanced Data Services - \$1,838.25". In an email on 2/7/12, our former Administrative Services Director told PIA that "The Advanced Data Services, as I now understand it, is the charge for providing phone service over our T-1 lines. I think it is the equivalent of a surcharge and is likely not eligible...". He was correct in describing the item as charges for a T-1 line that provides phone service, but his conclusion that it is ineligible is not correct. T-1 lines as part of a phone services are eligible for E-rate funding.

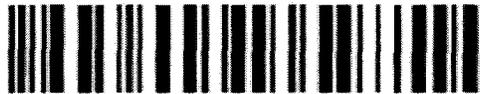
1. We request the FCC reverse the USAC decision to remove the funding for Advanced Data Services in this funding request for eligible T-1 line/Phone Services and restore the \$1,838.25 in monthly recurring pre-discount costs to our funding request. Given the 58% discount on this FRN, the monthly commitment amount should be increased by \$1,066.18 and the annual commitment should be increased by \$12,794.16.

2005-6 Program Year:

This entire 471 application # 489285 was denied because of "Insufficient documentation...Applicant has not provided sufficient documentation to determine the eligibility of this item." We understand from the Ombudsman that PIA requested information on this application, but no response was received. We do not have any documentation on which items were in question or what information was needed.

1. We request the FCC to reopen the review of this application so that we can respond to their questions and resolve any issues that were outstanding.

FCC Form 486	Do Not Write in this Area		Approval by OMB 3060-0853 Estimated time per response: 1.5 hours
Schools and Libraries Universal Service Receipt of Service Confirmation Form			
To be completed by the Billed Entity Please read instructions before completing. (You can also file online at www.usac.org/sl .)			
Applicant's Form Identifier SILYr2011 (Create your own code to identify THIS Form 486)		Form 486 Application#: 915589 (To be assigned by administrator)	
Block 1: Billed Entity Information			
1. Name of Billed Entity SNO ISLE REGIONAL LIBRARY			
2. Billed Entity Number 145230		3. Funding Year July 1, 2011 through June 30, 2012	
4. Complete Mailing Address of Billed Entity Street Address, P.O. Box, or Route Number 7312 35TH AVE NE			
City MARYSVILLE		State WA	Zip Code 98271 -
Telephone Number 360-651-7009	Extension	Fax Number 360-651-7151	
5. Contact Person Information Contact Person Name Claire O'Flaherty			
Street Address, P.O. Box or Route Number 5520 N 43rd St			
City Tacoma			
State WA		Zip Code 98407 -	
Check the box next to the preferred mode of contact. (At least one box MUST be checked.)			
<input type="checkbox"/> Telephone Number 253-752-4737		<input type="checkbox"/> Fax Number	
<input checked="" type="checkbox"/> Email Address claire@erateexpertise.com			



0486010103

Entity Number	145230	Applicant's Form Identifier	SILYr2011
Contact Person	Claire O'Flaherty	Phone Number	253-752-4737
Block 2: Early Filing Information and CIPA Waiver Requests			
6a. Early Filing			
CHECK THE BOX BELOW IF THE FRNS ON THIS FORM 486 ARE FOR SERVICES STARTING ON OR BEFORE JULY 31 OF THE FUNDING YEAR.			
<input type="checkbox"/> The Funding Requests listed in Block 3 have been approved by USAC as shown in my Funding Commitment Decision Letter (FCDL). I have confirmed with the service provider(s) featured in those Funding Requests that these services will start on or before July 31 of the Funding Year.			
Remember: Early filing using Item 6a is an option if and ONLY if services will start within the month of July of the relevant Funding Year, all relevant certifications in Block 4 can be accurately made, and the Form 486 is postmarked on or before July 31 of the Funding Year.			
6b. CIPA Waiver			
CHECK THE BOX BELOW IF YOU ARE REQUESTING A WAIVER OF CIPA REQUIREMENTS FOR THE SECOND FUNDING YEAR AFTER APRIL 20, 2001 IN WHICH YOU HAVE APPLIED FOR DISCOUNTS IF YOU AS THE BILLED ENTITY ARE THE ADMINISTRATIVE AUTHORITY.			
<input type="checkbox"/> I am providing notification that, as of the date of the start of discounted services, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the schools or libraries represented in the Funding Request Number(s) on this Form 486 will be brought into compliance with the CIPA requirements before the start of the Third Funding Year after April 20, 2001 in which they apply for discounts.			
6c. CIPA Waiver for Libraries for Funding Year 2004			
CHECK THE BOX BELOW IF YOU ARE REQUESTING A WAIVER OF CIPA REQUIREMENTS FOR FUNDING YEAR 2004 IF YOU AS THE BILLED ENTITY ARE THE ADMINISTRATIVE AUTHORITY FOR THE LIBRARY(IES) REPRESENTED ON THIS FORM 486.			
<input type="checkbox"/> I am providing notification that, as of the date of the start of discounted services in Funding Year 2004, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the libraries represented in the Funding Request Number(s) on this Form 486 will be brought into compliance with the CIPA requirements before the start of the Funding Year 2005.			



0486010203

Entity Number	145230	Applicant's Form Identifier	SILYr2011
Contact Person	Claire O'Flaherty	Phone Number	253-752-4737

Block 3: Service Information

7. Please provide the following information for each Form 471 Block 5 (Discount Funding Request) item for which the Billed Entity is indicating that the named service provider may begin submitting invoices to SLD. You will need your FCDL for some of the information required below.

Remember: The FRNs listed below must be from the same Funding Year as is listed in Block 1, Item 3.
 If you need additional pages, please label them 4A, 4B, 4C, etc. and indicate the number in the space provided here:
 Page 3

(A) 471 Application Number From FCDL	(B) Funding Request Number (FRN) From FCDL	(C) Service Provider Identification Number (SPIN) From FCDL	(D) Service Provider Name From FCDL	(E) Funding Year Service Start Date (Earliest Date that Discounted Services Will Begin)
821891	2238487	143004786	Frontier Communications Northwest, Inc.	7/1/2011
821891	2238488	143002608	Whidbey Telephone Company	7/1/2011



0486010303

Entity Number	145230	Applicant's Form Identifier	SILYr2011
Contact Person	Claire O'Flaherty	Phone Number	253-752-4737

Block 4: Certifications and Signature

8. I certify that the entity(ies) receiving discounted services as indicated on this Form 486 are covered by technology plan(s) that have been approved by a state or other authorized body ? a USAC-certified technology plan approver ? prior to the commencement of service and that cover all 12 months of the funding year. If applicable, provide the name(s) of the organization(s) that approved a technology plan for any eligible entity that is receiving services covered under this Form 486. If EVERY FRN listed in the Form 486 is for basic telephone service only, enter "NONE" here.

None

9. I certify that the services listed on this Form 486 have been, are planned to be, or are being provided to all or some of the eligible entities identified in the Form 471 application(s) cited above. I certify that there are signed contracts covering all of the services listed on this Form 486 except for those services provided on a tariff or month-to-month basis. I certify that I am authorized to submit this receipt of service confirmation on behalf of the above-named Billed Entity; that I have examined this request; and that, to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

10. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the services receive an appropriate share of benefits from those services. I recognize that I may be audited pursuant to this application and will retain for five years any and all records, including Forms 479 where required, that I rely upon to complete this form and, if audited, will make available to the Administrator such records.

NOTES FOR COMPLETING THE CERTIFICATIONS IN ITEM 11: A Billed Entity who is the Administrative Authority must check Item 11a or 11b or 11c. Check only ONE item. If the Billed Entity is not the Administrative Authority, skip to Item 11d. A Billed Entity who represents one or more Administrative Authorities must check Item 11d or 11e. (See the Form 486 Instructions for Item 11, "Special Notes for Billed Entities Who Represent One or More Administrative Authorities.") A Billed Entity who represents one or more Administrative Authorities in Funding Years after Funding Year 2001 and who checks Item 11d must check Item 11f or 11g. (See the Form 486 Instructions for Item 11, "Special Notes for Billed Entities Who Represent One or More Administrative Authorities.")

IF THIS FORM PERTAINS TO A FUNDING YEAR PRIOR TO FUNDING YEAR 2001 (THE FUNDING YEAR BEGINNING JULY 1, 2001), SKIP TO ITEM 12.



0486010403

Entity Number	146230	Applicant's Form Identifier	SILYr2011
Contact Person	Claire O'Flaherty	Phone Number	253-752-4737

11. FOR A BILLED ENTITY WHO IS THE ADMINISTRATIVE AUTHORITY:

I certify that as of the date of the start of discounted services:

a. the recipient(s) of service represented in the Funding Request Number(s) on this Form 486 has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (i).

b. pursuant to the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (i), the recipient(s) of service represented in the Funding Request Number(s) on this Form 486:

(FOR SCHOOLS and FOR LIBRARIES IN THE FIRST FUNDING YEAR FOR PURPOSES OF CIPA) is (are) undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA for the next funding year, but has (have) not completed all requirements of CIPA for this funding year.

(FOR FUNDING YEAR 2003 ONLY: FOR LIBRARIES IN THE SECOND OR THIRD FUNDING YEAR FOR PURPOSES OF CIPA) is (are) in compliance with the requirements of CIPA under 47 U.S.C. § 254(i) and undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA under 47 U.S.C. § 254(h) for the next funding year.

c. the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (i), does not apply because the recipient(s) of service represented in the Funding Request Number(s) on this Form 486 is (are) receiving discount services only for telecommunications services.

FOR A BILLED ENTITY WHO REPRESENTS ONE OR MORE ADMINISTRATIVE AUTHORITIES

d. I certify as the Billed Entity for the consortium that I have collected duly completed and signed Forms 479 from all eligible members of the consortium.

e. I certify as the Billed Entity for the consortium that the only services that have been approved for discounts under the universal service support mechanism on behalf of eligible members of the consortium are telecommunications services, and therefore the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (i), do not apply.

For Funding Years after Funding Year 2001: If you checked Item 11d above, check ONE of the boxes below:

f. I certify that some or all of the eligible consortium members checked Form 479 Item 6d or Item 6e to seek a CIPA Waiver, and upon request from the Administrator I can provide this information. OR

g. I certify that no eligible consortium members checked Form 479 Item 6d or Item 6e to seek a CIPA Waiver.

The certification language above is not intended to fully set forth or explain all the requirements of the statute.

¹ See the Form 486 Instructions for Item 11, "Special Notes for Billed Entities Who Represent One or More Administrative Authorities."

The certification language above is not intended to fully set forth or explain all the requirements of the statute.



0486010503

FCC Form
486

Do Not Write In This Area

Entity Number	145230	Applicant's Form Identifier	SILYr2011
Contact Person	Claire O'Flaherty	Phone Number	253-752-4737

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

12. Signature of authorized person		13. Date	
_____		8/14/2012 6:12:57 PM	
14. Printed name of authorized person			
Gary Sitzman			
15. Title or position of authorized person			
Administrative Services Director			
16a. Street Address, P.O. Box, or Route Number			
7312 35th Ave NE			
City			
Marysville			
State		Zip Code	
WA		98271 -	
16b. Telephone number of authorized person		Extension	16c. Fax number of authorized person
360-651-7009			360-651-7001
16d. Email address of authorized person			
GSitzman@sno-isle.org			



Entity Number	145230	Applicant's Form Identifier	SILYr2011
Contact Person	Claire O'Flaherty	Phone Number	253-752-4737

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERMs, Paperwork Reduction Act Project (3060-0853), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0853

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Please submit this form to:

SLD Form 486
P. O. Box 7026
Lawrence, Kansas 66044-7026

For express delivery services or U.S. Postal Service, Return Receipt Requested, send this form to:

SLD Forms
ATTN: SLD Form 486
3833 Greenway Drive
Lawrence, Kansas 66046
888-203-8100



0486010703



Universal Service Administrative Company
Schools & Libraries Division

FORM 486 NOTIFICATION LETTER
(Funding Year 2011: 07/01/2011 - 06/30/2012)

October 2, 2012

Claire O'Flaherty
SNO ISLE REGIONAL LIBRARY
5520 N 43rd St
Tacoma, WA 98407

Re: Form 486 Application Number: 915589
Applicant's Form 486 Identifier: SILYr2011

This letter is to notify you that the Universal Service Administrative Company (USAC) has received and accepted an FCC Form 486, Receipt of Service Confirmation Form, from you. This notification is to confirm the information that you provided. This information is being shared with the service provider whose SPIN you identified on each Funding Request Number (FRN).

You may be receiving this letter to revise or correct a previous Form 486 Notification Letter. The information contained in this letter supersedes any previous notification you may have received, including, but not limited to, a previously adjusted Service Start Date or previously reduced funding commitment.

NEXT STEPS

Discuss with your service provider whether you would like discounts on your bills or to pay your bills in full and be reimbursed for discounts.

Invoice USAC before the invoice deadline using the applicant invoice (BEAR Form - FCC Form 472) for reimbursements after paying the bills in full or the service provider invoice (SPI Form - FCC Form 474) for discounts. Whichever method you choose, you must pay your non-discount portion, as stated in Program rules. Program rules also require that participants maintain all documentation for at least five years after delivery of discount service.

TO APPEAL THE SERVICE START DATE/FUNDING COMMITMENT CHANGE DECISION

If you wish to appeal the Service Start Date change(s) and/or funding commitment adjustment(s) indicated in this letter, your appeal must be received by USAC or postmarked within 60 days of the above date on 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 email address for the person who can most readily discuss this appeal with us.

DUPLICATE LETTER

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 or service provider name, if different than appellant,
 - applicant BEN and service provider SPIN,
 - Form 486 Number 915589 and FRN(s) as assigned by USAC,
 - "Form 486 Notification Letter for Funding Year 2011", AND
 - the exact text or the decision that you are appealing.
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 an applicant, please provide a copy of your appeal to the service provider(s) affected by the USAC's decision. If you are a service provider, please provide a copy of your appeal to the applicant(s) affected by the USAC's decision.
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 us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us on paper, send your appeal to:

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

You have the option of filing an appeal with USAC or directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted on our website. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

A guide to the data reported in our letter reports is posted in the Reference Area of our website. Complete Program information, including invoice deadlines is also posted on our website. You may also contact our Client Service Bureau by email using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736, or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

FORM 486 NOTIFICATION LETTER REPORT
(Funding Year 2011)

Funding Request Number: 2238487
Form 471 Application Number: 821891
Service Provider Name: Frontier Communications Northwest, Inc.
Service Provider Identification Number: 143004786
Billing Account Number: N/A
Service Start Date: 04/17/2012*
Service Start Date Change Explanation: 120-DAY 486 DEADLINE
Adjusted Funding Commitment: \$14,256.96

Funding Request Number: 2238488
Form 471 Application Number: 821891
Service Provider Name: Whidbey Telephone Company
Service Provider Identification Number: 143002608
Billing Account Number: N/A
Service Start Date: 04/17/2012*
Service Start Date Change Explanation: 120-DAY 486 DEADLINE
Adjusted Funding Commitment: \$1,159.55

FCC Form 486

Do Not Write in this Area

Approval by OMB
3060-0853
Estimated time
per response: 1.5 hoursSchools and Libraries Universal Service
Receipt of Service Confirmation Form

To be completed by the Billed Entity

Please read instructions before completing.

(You can also file online at www.usac.org/sl.)Applicant's Form Identifier
(Create your own code to identify THIS Form 486)

SIL 2009

Form 486 Application#:
(To be assigned by administrator)

Block 1: Billed Entity Information

1. Name of Billed Entity

Sno Isle Regional Library

2. Billed Entity Number

145230

3. Funding Year July 1, 2009 through June 30, 2010

4. Complete Mailing Address of Billed Entity

Street Address, P.O. Box, or Route Number

7312 35th Ave NE

City

Marysville

State

WA

Zip Code

98271

Telephone Number

360-651-7009

Extension

Fax Number

360-651-7151

5. Contact Person Information

Contact Person Name

Claire O'Flaherty

Street Address, P.O. Box or Route Number

5520 N. 43rd St.

City

Tacoma

State

WA

Zip Code

98407

Check the box next to the preferred mode of contact. (At least one box MUST be checked.)

 Telephone Number

Extension

 Fax Number

253-320-0664

 Email Address

claire@erateexpertise.com



0486010103

Entity Number 145230 Applicant's Form Identifier SIL 2009
Contact Person Claire O'Flaherty Phone Number 253-320-0664

Block 2: Early Filing Information and CIPA Waiver Requests

6a. Early Filing

CHECK THE BOX BELOW IF THE FRNS ON THIS FORM 486 ARE FOR SERVICES STARTING **ON OR BEFORE** JULY 31 OF THE FUNDING YEAR.

- The Funding Requests listed in Block 3 have been approved by USAC as shown in my Funding Commitment Decision Letter (FCDL). I have confirmed with the service provider(s) featured in those Funding Requests that these services will start on or before July 31 of the Funding Year.

Remember: Early filing using Item 6a is an option if and ONLY if services will start within the month of July of the relevant Funding Year, all relevant certifications in Block 4 can be accurately made, and the Form 486 is postmarked on or before July 31 of the Funding Year.

6b. CIPA Waiver

CHECK THE BOX BELOW IF YOU ARE REQUESTING A WAIVER OF CIPA REQUIREMENTS FOR THE SECOND FUNDING YEAR AFTER APRIL 20, 2001 IN WHICH YOU HAVE APPLIED FOR DISCOUNTS IF YOU AS THE BILLED ENTITY ARE THE ADMINISTRATIVE AUTHORITY.

- I am providing notification that, as of the date of the start of discounted services, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the schools or libraries represented in the Funding Request Number(s) on this Form 486 will be brought into compliance with the CIPA requirements before the start of the Third Funding Year after April 20, 2001 in which they apply for discounts.

6c. CIPA Waiver for Libraries for Funding Year 2004

CHECK THE BOX BELOW IF YOU ARE REQUESTING A WAIVER OF CIPA REQUIREMENTS FOR FUNDING YEAR 2004 IF YOU AS THE BILLED ENTITY ARE THE ADMINISTRATIVE AUTHORITY FOR THE LIBRARY(IES) REPRESENTED ON THIS FORM 486.

- I am providing notification that, as of the date of the start of discounted services in Funding Year 2004, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the libraries represented in the Funding Request Number(s) on this Form 486 will be brought into compliance with the CIPA requirements before the start of the Funding Year 2005.



Entity Number 145230 Applicant's Form Identifier SIL 2009
 Contact Person Claire O'Flaherty Phone Number 253-320-0664

Block 3: Service Information

7. Please provide the following information for each Form 471 Block 5 (Discount Funding Request) item for which the Billed Entity is indicating that the named service provider may begin submitting invoices to SLD. You will need your FCDL for some of the information required below.
 Remember: The FRNs listed below must be from the same Funding Year as is listed in Block 1, Item 3.
 If you need additional pages, please label them 4A, 4B, 4C, etc. and indicate the number in the space provided here: Page 3

	(A) 471 Application Number From FCDL	(B) Funding Request Number (FRN) From FCDL	(C) Service Provider Identification Number (SPIN) From FCDL	(D) Service Provider Name From FCDL	(E) Funding Year Service Start Date (Earliest Date that Discounted Services Will Begin)
1	691322	1895599	143000677	Verizon Wireless	07-01-09
2	691322	1895668	143004786	Verizon Northwest, Inc	07-01-2009
3	691322	1903599	143004786	Verizon Northwest, Inc	07-01-2009
4	691322	1903710	143002608	Whidbey Telephone Company	07-01-2009
5					
6					
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8					
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11					
12					



Entity Number 145230 Applicant's Form Identifier SIL 2009
Contact Person Claire O'Flaherty Phone Number 253-752-4737

Block 4: Certifications and Signature

8. I certify that the entity(ies) receiving discounted services as indicated on this Form 486 are covered by technology plan(s) that have been approved by a state or other authorized body – a USAC-certified technology plan approver – prior to the commencement of service and that cover all 12 months of the funding year. If applicable, provide the name(s) of the organization(s) that approved a technology plan for any eligible entity that is receiving services covered under this Form 486. If EVERY FRN listed in the Form 486 is for basic telephone service only, enter "NONE" here.

WA State Library

9. I certify that the services listed on this Form 486 have been, are planned to be, or are being provided to all or some of the eligible entities identified in the Form 471 application(s) cited above. I certify that there are signed contracts covering all of the services listed on this Form 486 except for those services provided on a tariff or month-to-month basis. I certify that I am authorized to submit this receipt of service confirmation on behalf of the above-named Billed Entity; that I have examined this request; and that, to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

10. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the services receive an appropriate share of benefits from those services. I recognize that I may be audited pursuant to this application and will retain for five years any and all records, including Forms 479 where required, that I rely upon to complete this form and, if audited, will make available to the Administrator such records.

NOTES FOR COMPLETING THE CERTIFICATIONS IN ITEM 11: A Billed Entity who is the Administrative Authority must check Item 11a or 11b or 11c. Check only ONE item. If the Billed Entity is not the Administrative Authority, skip to Item 11d. A Billed Entity who represents one or more Administrative Authorities must check Item 11d or 11e. (See the Form 486 Instructions for Item 11, "Special Notes for Billed Entities Who Represent One or More Administrative Authorities.") A Billed Entity who represents one or more Administrative Authorities in Funding Years after Funding Year 2001 and who checks Item 11d must check Item 11f or 11g. (See the Form 486 Instructions for Item 11, "Special Notes for Billed Entities Who Represent One or More Administrative Authorities.")

IF THIS FORM PERTAINS TO A FUNDING YEAR PRIOR TO FUNDING YEAR 2001 (THE FUNDING YEAR BEGINNING JULY 1, 2001), SKIP TO ITEM 12.



Entity Number 145230 Applicant's Form Identifier 51L 2009
Contact Person Claire O'Flaherty Phone Number 253-320-0664

11. FOR A BILLED ENTITY WHO IS THE ADMINISTRATIVE AUTHORITY:

I certify that as of the date of the start of discounted services:

- a. the recipient(s) of service represented in the Funding Request Number(s) on this Form 486 has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l).
- b. pursuant to the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), the recipient(s) of service represented in the Funding Request Number(s) on this Form 486:

(FOR SCHOOLS and FOR LIBRARIES IN THE FIRST FUNDING YEAR FOR PURPOSES OF CIPA) is (are) undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA for the next funding year, but has (have) not completed all requirements of CIPA for this funding year.

(FOR FUNDING YEAR 2003 ONLY: FOR LIBRARIES IN THE SECOND OR THIRD FUNDING YEAR FOR PURPOSES OF CIPA) is (are) in compliance with the requirements of CIPA under 47 U.S.C. § 254(l) and undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA under 47 U.S.C. § 254(h) for the next funding year.

- c. the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), does not apply because the recipient(s) of service represented in the Funding Request Number(s) on this Form 486 is (are) receiving discount services only for telecommunications services.

FOR A BILLED ENTITY WHO REPRESENTS ONE OR MORE ADMINISTRATIVE AUTHORITIES ¹:

- d. I certify as the Billed Entity for the consortium that I have collected duly completed and signed Forms 479 from all eligible members of the consortium.
- e. I certify as the Billed Entity for the consortium that the only services that have been approved for discounts under the universal service support mechanism on behalf of eligible members of the consortium are telecommunications services, and therefore the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), do not apply.

For Funding Years after Funding Year 2001: If you checked Item 11d above, check ONE of the boxes below:

- f. I certify that some or all of the eligible consortium members checked Form 479 Item 6d or Item 6e to seek a CIPA Waiver, and upon request from the Administrator I can provide this information; OR
- g. I certify that no eligible consortium members checked Form 479 Item 6d or Item 6e to seek a CIPA Waiver.

The certification language above is not intended to fully set forth or explain all the requirements of the statute.

¹ See the Form 486 Instructions for Item 11, "Special Notes for Billed Entities Who Represent One or More Administrative Authorities."

The certification language above is not intended to fully set forth or explain all the requirements of the statute.

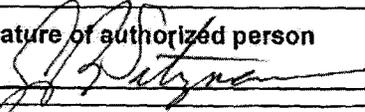


0 4 8 6 0 1 0 5 0 3

Do Not Write In This Area

Entity Number	145230	Applicant's Form Identifier	SIL 2009
Contact Person	Claire O'Flaherty	Phone Number	253-320-0664

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

12. Signature of authorized person	13. Date
	11/20/2012
14. Printed name of authorized person	
Gary Sitzman	
15. Title or position of authorized person	
Administrative Services Director	
16a. Street Address, P.O. Box, or Route Number	
7312 35 th Ave NE	
City	
Marysville	
State	Zip Code
WA	98271
16b. Telephone number of authorized person	16c. Fax number of authorized person
360-651-7009	360-651-7001
16d. Email address of authorized person	
gsitzman@sno-isle.org	



0486010603

Entity Number 145230 Applicant's Form Identifier SIL 2009
Contact Person Claire O'Flaherty Phone Number 253-320-0664

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Act Project (3060-0853), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0853.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Please submit this form to:

SLD Form 486
P. O. Box 7026
Lawrence, Kansas 66044-7026

For express delivery services or U.S. Postal Service, Return Receipt Requested, send this form to:

SLD Forms
ATTN: SLD Form 486
3833 Greenway Drive
Lawrence, Kansas 66046
888-203-8100



FCC Form 486	Do Not Write in this Area		Approval by OMB 3060-0853 Estimated time per response: 1.5 hours
Schools and Libraries Universal Service Receipt of Service Confirmation Form			
To be completed by the Billed Entity Please read instructions before completing.		(You can also file online at www.usac.org/sl .)	
Applicant's Form Identifier (Create your own code to identify THIS Form 486) SIL2010		Form 486 Application#: To be assigned by administrator	
Block 1: Billed Entity Information			
1. Name of Billed Entity Sno Isle Regional Library			
2. Billed Entity Number 145230		3. Funding Year July 1, 2010 through June 30, 2011	
4. Complete Mailing Address of Billed Entity Street Address, P.O. Box, or Route Number 7312 354th Ave NE			
City Marysville		State WA	Zip Code 98271
Telephone Number 360-651-7009		Extension	
		Fax Number 360-651-7151	
5. Contact Person Information			
Contact Person Name Claire O'Flaherty			
Street Address, P.O. Box or Route Number 5520 N. 43rd St.			
City Tacoma			
State WA		Zip Code 98407	
Check the box next to the preferred mode of contact. (At least one box MUST be checked.)			
<input type="checkbox"/> Telephone Number		<input type="checkbox"/> Fax Number	
253-320-0664			
<input checked="" type="checkbox"/> Email Address		Claire@erateexpertise.com	



0486010103

Entity Number 145230 Applicant's Form Identifier SIL 2010
Contact Person Claire O'Flaherty Phone Number 253-320-0664

Block 2: Early Filing Information and CIPA Waiver Requests

6a. Early Filing

CHECK THE BOX BELOW IF THE FRNS ON THIS FORM 486 ARE FOR SERVICES STARTING *ON OR BEFORE* JULY 31 OF THE FUNDING YEAR.

- The Funding Requests listed in Block 3 have been approved by USAC as shown in my Funding Commitment Decision Letter (FCDL). I have confirmed with the service provider(s) featured in those Funding Requests that these services will start on or before July 31 of the Funding Year.

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6c. CIPA Waiver for Libraries for Funding Year 2004

CHECK THE BOX BELOW IF YOU ARE REQUESTING A WAIVER OF CIPA REQUIREMENTS FOR FUNDING YEAR 2004 IF YOU AS THE BILLED ENTITY ARE THE ADMINISTRATIVE AUTHORITY FOR THE LIBRARY(IES) REPRESENTED ON THIS FORM 486.

- I am providing notification that, as of the date of the start of discounted services in Funding Year 2004, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the libraries represented in the Funding Request Number(s) on this Form 486 will be brought into compliance with the CIPA requirements before the start of the Funding Year 2005.

