

Letter of Appeal

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December 1, 2013

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Received & Inspected
DEC 08 2013
FCC Mail Room

CC Docket No. 02-6

From:

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

RE: Below please find a copy of the Letters of Appeal our company filed with the Schools & Libraries Correspondence Unit requesting the discontinuance of Commitment Adjustments for the following:

Applicant Name: Yeshiva Viznitz D'Khal Torath Chaim
Billed Entity Number: 152310
Applicant Contact Person: Israel Neiman

Form 471: 808014
FRN(s): 2193578
Funding Year: 2011
Form 471: 758364
FRN(s): 2049387
Funding Year: 2010
Form 471: 690235
FRN(s): 1891561, 1891597, 1891197
Funding Year: 2009
Form 471: 620614
FRN(s): 1709726, 1709732
Funding Year: 2008
Form 471: 575464
FRN(s): 1590899, 1590917, 1590831
Funding Year: 2007

In response to the Letter of Appeal we received the Administrator's Decision on Appeal indicating "Denied" for the following FRNs:

1590831, 1891561, 1891597

In addition, we received we received the Administrator's Decision on Appeal indicating that our Letter of Appeal had been received later that 60 days from the date of the Commitment Adjustments Letter and therefore they were not permitted to consider our Appeal. We received this response for the following FRNs:

1590899, 1590917, 1891197, 2193578, 2049387

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Regarding FRNs 1709726 and 1709732 we do not have any record of having yet received an Administrator's Decision on Appeal. However based on the other Administrator's Decision on Appeal we are assuming they will be denied and we are asking the Commission to include them in this Letter of Appeal.

Applicant Name: NS Community Improvement Council Head Start
Billed Entity Number: 16041028
Applicant Contact Person: Hindy Diamant

Form 471: 805150
FRN(s): 2182782, 2182805
Funding Year: 2011
Form 471: 756208
FRN(s): 2043578
Funding Year: 2010
Form 471: 685013
FRN(s): 1873629, 1873584, 18733658, 1873604
Funding Year: 2009

In response to the Letter of Appeal we received the Administrator's Decision on Appeal indicating that our Letter of Appeal had been received later than 60 days from the date of the Commitment Adjustments Letter and therefore they were not permitted to consider our Appeal. We received this response for the following FRNs:

2182782, 2182805, 2043578, 1873629, 1873584, 18733658, 1873604

Applicant Name: Mosdos Sanz Klausenburg of Monsey
Billed Entity Number: 16040091
Applicant Contact Person: Abraham Spitzer

Form 471: 803682
FRN(s): 2178663, 2178326, 2178351
Funding Year: 2011

In response to the Letter of Appeal we received the Administrator's Decision on Appeal indicating "Denied" for the following FRNs:

2178663

In response to the Letter of Appeal we received the Administrator's Decision on Appeal indicating that our Letter of Appeal had been received later than 60 days from the date of the Commitment Adjustments Letter and therefore they were not permitted to consider our Appeal. We received this response for the following FRNs:

2178326, 2178351

In the Administrator's Decision on Appeal indicating "Denied" for Form 471 575464, FRN 1590831, the Explanation was essentially a repetition of the explanation given on the original Funding Commitment Adjustment with the additional comment that our appeal did not show that the USAC's determination was incorrect. There was no reference to any of the arguments included in our Letter of Appeal nor was there any defense USAC's decision against our arguments.

In the Administrator's Decision on Appeal indicating "Denied" for Form 471 803682, FRN 2178663, the Explanation stated "USAC has determined that the Bogen telephone system included within the above funding is functioning as a redundant service and is ineligible according to the rules of this support mechanism. In your appeal you have verified that you are using two telephone systems to function as one. Program rules state that the Bogen telephone system is eligible if it is the only telephone system in use. Therefore, the decision to rescind funding for maintenance on the redundant Bogen telephone system is upheld. Consequently, the appeal is denied."

This response paraphrases information that was stated in our Letter of Appeal (provided below) as part of a very clear explanation as to why the Bogen system *is not* redundant and takes it out of context is some unclear attempt to imply that the Bogen system is redundant.

The actual language of the Appeal is "The applicant determined that the best design for their school was to use two PBX systems that are integrated to function as one system. The reason for this decision was that there are different types of telephones needed in different areas. Some areas need digital or IP based telephones and some areas need standard analog telephones. In order to have the best system for each type of phone they would use two PBXs, each one being the best choice for that type of phone."

Two systems, integrated to function (together) as one, where each is serving a specific independent function from other, where both functions are needed, are not redundant.

Additionally, the statement "Program rules state that the Bogen telephone system is eligible if it is the only telephone system in use" was given without any reference to where this rule may be found and a through perusal of the Eligible Services List revealed no such rule.

The explanation given on the original Funding Commitment Adjustment (quoted below in our Letter of Appeal) made two claims; that funds were committed for an ineligible redundant item and that it was the Service Providers responsibility to determine that the items billed for were eligible and therefore it is the Service Provider who must make restitution. Although in this particular case the item in question, based on our understanding of the program rules, is clearly eligible and therefore the second claim (that the Service Provider is responsible for restitution) is mute, our Letter of Appeal addressed both issues.

Our Letter of Appeal argues that:

- 1- The Item in question is eligible
- 2- Based on the definition of redundancy given in the Eligible Items List the item in question was not being used in a redundant fashion
- 3- Redundancy is not an integrally ineligible feature of an item. If it is the program's prerogative to make a "judgment call" and determine that even though there was no clear indication in the Eligible Items List that the way in which item was used in the FRN in question was redundant, yet they may deem it so, this should have been done in advance by the Program Integrity Assurance (PIA) group (at which time the School or Service Provider could have sent in a Letter of Appeal). If PIA did not determine that the item was used in a redundant fashion, the Service Provider certainly should not be held responsible retroactively.
- 4- In addition to item 3, the extended history of this item being used in the same way as it was used in the FRN for which the COMAD was issued and repeatedly being approved for funding, further demonstrates that there was no reason for the Service Provider to consider that the item was ineligible or the way in which it was being used should be considered redundant and therefore the Service Provider certainly should not be held responsible retroactively.

In the case of an item that is not integrally ineligible (i.e. a telephone or a computer work station), once the item has been approved for funding, installed and funding disbursed, particularly in the case of internal connections where the Service Provider has direct cost of goods sold expenditures (which are not a shared cost like a telecommunication carrier's central office equipment) in light of the great financial loss it is an unfair burden to ask the Service Provider to take a greater responsibility for the determination of eligibility than Program Administrator (PIA) and the Service Provider should not be responsible for reimbursement of the distributed funding.

As a participant in the program we take this opportunity to implore the Commission to consider the untenable position in which USAC is placing the service provider. In our opinion this particular case shows clearly how flawed the situation is. As indicated below in our original appeal, we have a situation where based on the descriptions given in the Eligible Items List the item in question is eligible, and is being used in an eligible fashion. The item being used and the way in which it is being used in the FRN for which the COMAD was issued has been through PIA review for over twelve years and has been repeatedly considered eligible and approved for funding, the program website included the item on a list of items that had been reviewed by the program and listed a eligible items (screen shots attached) and with all this USAC expects the Service Provider to decide on their own the item or its use really isn't eligible.

NOTE: The Bogen Multicom equipment is again listed on the SLD website as Eligible. Go to "Search Tools" then "View Eligible Products" and search for Bogen.

We request the Commission review our original Letter of Appeal and direct USAC to discontinue it Commitment Adjustment actions and to restore the funding to its original amount.

Regarding the Administrator's Decision on Appeal indicating that our Letter of Appeal had been received later than 60 days from the date of the Commitment Adjustments Letter and therefore they were not permitted to consider our Appeal we ask the Commission waive the 60 day Appeal deadline.

There were extenuating circumstances that caused a delay in our being able to respond to the COMAD notifications. Shortly after receiving the COMAD notifications the person within our company that is in charge of our E-Rate work and who is the only one in the company that would be qualified to respond was injured and was hospitalized. After hospitalization he was bedridden at home for an extended period of time. As soon as he was able to do so, even though he was not fully back at work yet, he put together our Letter of Appeal but by that time it was later than 60 days for some of the responses.

Also attached is a copy of the paperwork showing the "Notice and Proof of Claim for Disability Benefits".

Letter of Appeal

September 12, 2013

Letter of Appeal
School & Libraries – Correspondence Unit
30 Lanidex Plaza West
P.O. Box 685
Parsippany, NJ 07054-0685

From:

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Applicant Name: Yeshiva Viznitz D'Khal Torath Chaim
Billed Entity Number: 152310
Applicant Contact Person: Israel Neiman

Our company has received Notification of Commitment Adjustment Letter(s) (COMAD) regarding the Form 471 Applications and Funding Request Numbers (FRN) listed below. We are submitting this Letter of Appeal to request that based on the information we have provided below the USAC should discontinue its commitment adjustment and restore the Funding Commitment to its original amount(s).

SPIN: 143030176
Form 471: 808014
FRN(s): 2193578
Funding Year: 2011
Form 471: 758364
FRN(s): 2049387
Funding Year: 2010
Form 471: 690235
FRN(s): 1891561, 1891597, 1891197
Funding Year: 2009
Form 471: 620614
FRN(s): 1709726, 1709732
Funding Year: 2008
Form 471: 575464
FRN(s): 1590899, 1590917, 1590831
Funding Year: 2007

The COMAD Funding Commitment Adjustment Explanations included the following Items:

Bogen Quantum Multicom expansion equipment
Bogen Quantum Multicom PBX expansion equipment
Rauland equipment

The COMAD Funding Commitment Adjustment Explanations sought to rescind funding for all charges associated with the equipment and for associated maintenance charges.

The COMAD Funding Commitment Adjustment Explanations indicated the reason for rescinding the funding commitment for this equipment (and maintenance of the equipment) is "it was determined that funding was provided for the following ineligible items.... "ineligible redundant PBX equipment"....."FCC rules provide that funding may be approved only for eligible products and/or services. See the web site, www.usac.org/si/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation.

We Do Not Agree with the Eligibility Determination

We do not agree the Eligibility Determination for the following reasons:

- 1- The Bogen Multicom and Rauland are eligible based on the Eligible Services List and the Bogen Multicom was specifically listed on a previously posted page of the USAC website as an approved (eligible) product.
- 2- The Bogen Multicom and Rauland are not being used in a redundant fashion.
- 3- The Bogen Multicom and Rauland are cost effective.
- 4- The Service Provider is not responsible for any program rule violation.
- 5- Wiring for the installation of single line telephones (material, labor and setup/programming charges) is eligible irrespective of the eligibility of the Bogen Multicom and Rauland components.

1- The Bogen Multicom and Rauland are Eligible Products

Until recently the Bogen Multicom was listed as an eligible product on the Schools and Libraries Web Site (see attached "screen shots" of the listings).

The Bogen Multicom and Rauland are eligible based on the descriptions found in the Eligible Service List on page 15. It states:

"Centralized components that are an essential element in the transport of telephone services within a school or library **are eligible**. This includes:

Private Branch Exchange (PBX)
Key System (KSU)
Wireless
VoIP Telephony Equipment

It then further states:

"An intercom system that is an integral component of a PBX or other eligible product can be included in the cost of the **eligible** component"

In the Glossary section on page 42 Page a "PBX" is described as:

"A PBX is a centralized telephone switching system located at a business or organization site. The PBX provides internal station-to-station dialing and access to the public switched network."

The Bogen Multicom and Rauland are functioning as a "Private Branch Exchange (PBX)" and provides internal station-to-station dialing and access to the public switched network and is therefore an eligible product.

2- The Bogen Multicom and Rauland are Not Redundant

The only reference to "redundant" in the Eligible Services List is the following:

"Products and services are only eligible as Internal Connections if they are an essential element in the transmission of information within the school or library.

The following components are NOT ELIGIBLE: ...Components that are installed in standby mode, redundant, not active and online, or otherwise not an essential element in the transmission of information within the school or library "

The applicant determined that the best design for their school was to use two PBX systems that are integrated to function as one system. The reason for this decision was that there are different types of telephones needed in different areas. Some areas need

digital or IP based telephones and some areas need standard analog telephones. In order to have the best system for each type of phone they would use two PBXs, each one being the best choice for that type of phone.

The school did not want to find itself in a position where it was going to be forced to use digital or IP telephones in the areas where it specifically wants standard analog telephones. Further, as the industry goes further towards an IP Phone standard the cost of using standard analog telephones is increasing and the capability of those telephones on the IP systems is inferior to the capability of an analog phone on a system that is designed for them.

The Bogen Multicom and the Rauland system are both designed to work primarily with standard analog telephones. They provide the greatest capability and the lowest cost both for the initial installation and maintenance.

The program rules do not indicate a limit on PBXs used. Just as a school may decide, based on its particular needs, to have some 10/100 data switches and some gigabit data switches or some switches that use copper wiring and some that use fiber optics wiring and those switches are not considered redundant so too the school should be able to address its various telephony need with two different types of PBXs.

The Bogen Multicom and Rauland are not a standby or back up system, they are in use and online at all times. They are the exclusive PBX system used for the locations within the school where the Bogen Multicom or Rauland provides telephone service. There are no locations where the Bogen Multicom or Rauland is being used in addition to the other PBX. Each location is either on the Inter-Tel Axxess PBX or the Bogen Multicom or Rauland; therefore the Bogen Multicom and Rauland are not redundant.

The design configuration of a "Key System behind a PBX" (both of which are eligible items) is a classic telephony design and has been used in the telephony industry for many years. Although our design is not a classic key system behind a PBX the fact still remains that there is a precedent in the industry to use multiple systems that are integrated in order to provide the best overall product.

3- The Bogen Multicom and Rauland are Cost Effective

The cost of adding the expansion cards, power supplies, cabinets, distribution cables, blocks, and programming to the Inter-Tel Axxess PBX to provide telephone service for the locations that the Bogen Multicom or the Rauland is providing is greater than the cost of using the Bogen Multicom or the Rauland. Therefore the use of the Bogen Multicom or the Rauland is the most cost effective solution.

4- The Service Provider is not responsible for any program rule violation

Based on the Funding Commitment Adjustment Explanation the rule violation was the FCC ruling that "funding may be approved only for eligible products and/or services". Neither the service provider nor the school has the power to approve funding, which is the job of the fund administrator.

The Commitment Adjustment Explanation stated "On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support"

The certification at Item 10 of the SPAC form actually states:

"10. I certify that the Service Provider Invoice Forms (FCC Form 474) that are submitted by this Service Provider are based on bills or invoices issued by the service provider to the Service Provider's customers on behalf of schools, libraries, and consortia of those entities as deemed eligible for universal service support by the fund administrator, and exclude any charges previously invoiced to the fund administrator for which the fund administrator has not yet issued a reimbursement decision."

The certification at Item 10 of the SPAC form does not refer to items or services at all, it refers to "bills or invoices". The subject of the phrase "as deemed eligible by the fund administrator" is the entity that is deemed eligible for universal service support by the fund administrator.

In any case, even if items or services were mentioned (as in paragraph 9) and the phrases "as deemed eligible by the fund administrator" were to be referring to those items and services, the language clearly indicates that the determination of eligibility is the responsibility of the fund administrator.

The Applicant (and the Service Provider) must make a good faith effort to submit requests for items and services they understand to be eligible, but the final determination of eligibility is the responsibility of the fund administrator (PIA).

The Funding Commitment Adjustment Explanation seemingly in an effort to enable the applicant to understand their error or to help them do better in the future directs the applicant to "See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List." Yet it is this very list that the school and the service provider made their good faith decision that the products in question are eligible. This included an actual listing of products that the SLD deemed eligible in which the Bogen Multicom was included.

Lacking a specific list of eligible products, which would include the Manufacturer, model and part numbers or *extremely specific* eligibility rules, it is an onerous burden to put the Applicant and the Service Provider in a position where they have to take a greater responsibility for eligibility determination than the fund administrator (PIA).

The very fact that the Bogen Multicom and the Rauland could have been considered eligible since the start of the program until now and the Bogen Multicom was actually listed as an eligible product on the program's website clearly underlines the difficulty of trying to figure out what is eligible, what is not eligible and what might change tomorrow. NOTE: Our understanding, as stated above, is that the Bogen Multicom and the Rauland are eligible based on the eligible services list.

Further, to put the Applicant and the Service provider in a situation where the program can change their minds about eligibility and request funding to be returned, after the Service Provider has purchased and installed the "approved" products and services is an unfair burden. Such a situation could put a small company out of business.

5- Wiring for the installation of single line telephones (material, labor and setup/programming charges) is eligible irrespective of the eligibility of the Bogen Multicom or the Rauland components

The single line telephones used for the classroom telephones and other miscellaneous locations where a standard industry analog telephone is the preferred type of telephone instrument to be used are currently facilitating the eligible function of providing internal station-to-station dialing and access to the public switched network.

Therefore the material, labor, and setup/programming charges associated with the wiring and implementation of these telephones (not including the actual phone instrument), which are not an integral component of the Bogen Multicom or the Rauland, but were simply included on the same bill of material that made up the FRN(s) in which the Bogen Multicom or the Rauland equipment was included should be excluded from the COMAD(s) listed above irrespective of the eligibility or ineligibility of the Bogen Multicom or the Rauland components.

Based on the information we have provided we request that USAC should discontinue its commitment adjustment and restore the Funding Commitment to its original amount(s).

This ends the copy of the Letters of Appeal sent to USAC. Based on the arguments presented in the Letters of Appeal to USAC and additional ones presented in this Letter of Appeal

Sincerely,

Jacob Steiner
Prime Security and Communication, Inc.

Attachments:
(7) Screen Shots from SLD Web Site Showing Bogen Multicom is eligible

Letter of Appeal

September 12, 2013

Letter of Appeal
School & Libraries – Correspondence Unit
30 Lanidex Plaza West
P.O. Box 685
Parsippany, NJ 07054-0685

From:

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
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Monsey, NY 10952

SPIN:	143030176
Form 471:	805150
FRN(s):	2182782, 2182805
Funding Year:	2011
Form 471:	756208
FRN(s):	2043578
Funding Year:	2010
Form 471:	685013
FRN(s):	1873629, 1873584, 18733658, 1873604

Funding Year: 2009

Applicant Name: NS Community Improvement Council Head Start
Billed Entity Number: 16041028
Applicant Contact Person: Hindy Diamant

Our company has received Notification of Commitment Adjustment Letter(s) (COMAD) regarding the Form 471 Applications and Funding Request Numbers (FRN) listed above. We are submitting this Letter of Appeal to request that based on the information we have provided below the USAC should discontinue its commitment adjustment and restore the Funding Commitment to its original amount(s).

The COMAD Funding Commitment Adjustment Explanations included the following Items: "Bogen PBX Expansion Unit"

The COMAD Funding Commitment Adjustment Explanations sought to rescind funding for all charges associated with the equipment and for associated maintenance charges.

The COMAD Funding Commitment Adjustment Explanations indicated the reason for rescinding the funding commitment for this equipment (and maintenance of the equipment) is "it was determined that funding was provided for the following ineligible items.... "Bogen PBX Expansion Unit"....."FCC rules provide that funding may be approved only for eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation.

We Do Not Agree with the Eligibility Determination

We do not agree the Eligibility Determination for the following reasons:

- 6- The Bogen PBX Expansion Unit (Multicom) is eligible based on the Eligible Services List and the Bogen PBX Expansion Unit (Multicom) was specifically listed on a previously posted page of the USAC website as an approved (eligible) product.
- 7- The Bogen PBX Expansion Unit (Multicom) is not being used in a redundant fashion.
- 8- The Bogen PBX Expansion Unit (Multicom) is cost effective.
- 9- The Service Provider is not responsible for any program rule violation.
- 10- Wiring for the installation of single line telephones (material, labor and setup/programming charges) is eligible irrespective of the eligibility of the Bogen PBX Expansion Unit (Multicom) components.

1- The Bogen PBX Expansion Unit (Multicom) is an Eligible Product

Until recently the Bogen PBX Expansion Unit (Multicom) was listed as an eligible product on the Schools and Libraries Web Site (see attached "screen shots" of the listings).

The Bogen PBX Expansion Unit (Multicom) and Rauland are eligible based on the descriptions found in the Eligible Service List on page 15. It states:

"Centralized components that are an essential element in the transport of telephone services within a school or library **are eligible**. This includes:

Private Branch Exchange (PBX)
Key System (KSU)

Wireless
VoIP Telephony Equipment

It then further states:

"An intercom system that is an integral component of a PBX or other eligible product can be included in the cost of the **eligible** component"

In the Glossary section on page 42 Page a "PBX" is described as:

"A PBX is a centralized telephone switching system located at a business or organization site. The PBX provides internal station-to-station dialing and access to the public switched network."

The Bogen PBX Expansion Unit (Multicom) is functioning as a "Private Branch Exchange (PBX)" and provides internal station-to-station dialing and access to the public switched network and is therefore an eligible product.

2- The Bogen PBX Expansion Unit (Multicom) is Not Redundant

The only reference to "redundant" in the Eligible Services List is the following:

"Products and services are only eligible as Internal Connections if they are an essential element in the transmission of information within the school or library.

The following components are NOT ELIGIBLE: ...Components that are installed in standby mode, redundant, not active and online, or otherwise not an essential element in the transmission of information within the school or library "

The applicant determined that the best design for their school was to use two PBX systems that are integrated to function as one system. The reason for this decision was that there are different types of telephones needed in different areas. Some areas need digital or IP based telephones and some areas need standard analog telephones. In order to have the best system for each type of phone they would use two PBXs, each one being the best choice for that type of phone.

The school did not want to find itself in a position where it was going to be forced to use digital or IP telephones in the areas where it specifically wants standard analog telephones. Further, as the industry goes further towards an IP Phone standard the cost of using standard analog telephones is increasing and the capability of those telephones on the IP systems is inferior to the capability of an analog phone on a system that is designed for them.

The Bogen Multicom is designed to work primarily with standard analog telephones. The Bogen Multicom provides the greatest capability the lowest cost for the initial installation and maintenance.

The program rules do not indicate a limit on PBXs used. Just as a school may decide, based on its particular needs, to have some 10/100 data switches and some gigabit data switches or some switches that use copper wiring and some that use fiber optics wiring and those switches are not considered redundant so too the school should be able to address it's various telephony need with two different types of PBXs.

The Bogen PBX Expansion Unit (Multicom) is not a standby or back up system, it in use and online at all times. It is the exclusive PBX system used for the locations within the school where the Bogen PBX Expansion Unit (Multicom) provides telephones service.

There are no locations where the Bogen PBX Expansion Unit (Multicom) is being used in addition to the other PBX. Each location is either on the Panasonic PBX or the Bogen PBX Expansion Unit (Multicom); therefore there it is not redundant.

The design configuration of a "Key System behind a PBX" (both of which are eligible items) is a classic telephony design and has been used in the telephony industry for many years. Although our design is not actually a key system behind a PBX the fact still remains that there is a precedent in the industry to use multiple systems that are integrated in order to provide the best overall product.

3- The Bogen PBX Expansion Unit (Multicom) is Cost Effective

The cost of adding the expansion cards, power supplies, cabinets, distribution cables, blocks, and programming to the Panasonic PBX to provide telephone service for the locations that the Bogen PBX Expansion Unit (Multicom) is providing is similar to the cost of using the Bogen PBX Expansion Unit (Multicom). Therefore the use of the Bogen PBX Expansion Unit (Multicom) is cost effective.

4- The Service Provider is not responsible for any program rule violation

Based on the Funding Commitment Adjustment Explanation the rule violation was the FCC ruling that "funding may be approved only for eligible products and/or services". Neither the service provider nor the school has the power to approve funding, which is the job of the fund administrator.

The Commitment Adjustment Explanation stated "On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support"

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The certification at Item 10 of the SPAC form does not refer to items or services at all, it refers to "bills or invoices". The subject of the phrase "as deemed eligible by the fund administrator" is the entity that is deemed eligible for universal service support by the fund administrator.

In any case, even if items or services were mentioned (as in paragraph 9) and the phrases "as deemed eligible by the fund administrator" were to be referring to those items and services, the language clearly indicates that the determination of eligibility is the responsibility of the fund administrator.

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The Funding Commitment Adjustment Explanation seemingly in an effort to enable the applicant to understand their error or to help them do better in the future directs the

applicant to "See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List." Yet it is this very list that the school and the service provider made their good faith decision that the products in question are eligible. This included an actual listing of products that the SLC deemed eligible in which the Bogen PBX Expansion Unit (Multicom) was included.

Lacking a specific list of eligible products, which would include the Manufacturer, model and part numbers (which or *extremely specific* eligibility rules, it is an onerous burden to put the Applicant and the Service Provider in a position where they have to take a greater responsibility for eligibility determination than the fund administrator (PIA).

The very fact that the Bogen PBX Expansion Unit (Multicom) could have been considered eligible since the start of the program until now and was actually listed as an eligible product clearly underlines the difficulty of trying to figure out what is eligible, what is not eligible and what might change tomorrow. NOTE: Our understanding, as stated above, is that the Bogen PBX Expansion Unit (Multicom) is eligible based on the eligible services list.

Further, to put the Applicant and the Service provider in a situation where the program can change their minds about eligibility and request funding to be returned, after the Service Provider has purchased and installed the "approved" products and services is an unfair burden. Such a situation could put a small company out of business.

6- Wiring for the installation of single line telephones (material, labor and setup/programming charges) is eligible irrespective of the eligibility of the Bogen PBX Expansion Unit (Multicom) components

The single line telephones used for the classroom telephones and other miscellaneous locations where a standard industry analog telephone is the preferred type of telephone instrument to be used are currently performing the eligible function of providing internal station-to-station dialing and access to the public switched network.

Therefore the material, labor, and setup/programming charges associated with the wiring and implementation of these telephones (not including the actual phone instrument), which are not an integral component of the Bogen PBX Expansion Unit (Multicom), but were simply included on the same bill of material that made up the FRN(s) in which the Bogen PBX Expansion Unit (Multicom) equipment was included should be excluded from the COMAD(s) listed above irrespective of the eligibility or ineligibility of the Bogen PBX Expansion Unit (Multicom) components.

Based on the information we have provided we request that USAC should discontinue its commitment adjustment and restore the Funding Commitment to its original amount(s).

Sincerely,

Jacob Steiner
Prime Security and Communication, Inc.

Attachments:

(7) Screen Shots from SLD Web Site Showing Bogen Multicom is eligible

Letter of Appeal

Received & Inspected

DEC 06 2013

FCC Mail Room

September 12, 2013

Letter of Appeal
School & Libraries – Correspondence Unit
30 Lanidex Plaza West
P.O. Box 685
Parsippany, NJ 07054-0685

From:

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

SPIN: 143030176
Form 471: 803682
FRN(s): 2178663, 2178326, 2178351
Funding Year: 2011

Applicant Name: Mosdos Sanz Klausenburg of Monsey
Billed Entity Number: 16040091
Applicant Contact Person: Abraham Spitzer

Our company has received Notification of Commitment Adjustment Letter(s) (COMAD) regarding the Form 471 Applications and Funding Request Numbers (FRN) listed below. We are submitting this Letter of Appeal to request that based on the information we have provided below the USAC should discontinue its commitment adjustment and restore the Funding Commitment to its original amount(s).

The COMAD Funding Commitment Adjustment Explanations included the following Items: "Bogen PBX Expansion Unit"

The COMAD Funding Commitment Adjustment Explanations sought to rescind funding for all charges associated with the equipment and for associated maintenance charges.

The COMAD Funding Commitment Adjustment Explanations indicated the reason for rescinding the funding commitment for this equipment (and maintenance of the equipment) is "it was determined that funding was provided for the following ineligible items.... "Bogen PBX Expansion Unit"....."FCC rules provide that funding may be approved only for eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation.

We Do Not Agree with the Eligibility Determination

We do not agree the Eligibility Determination for the following reasons:

- 11- The Bogen PBX Expansion Unit (Multicom) is eligible based on the Eligible Services List and the Bogen PBX Expansion Unit (Multicom) was specifically listed on a previously posted page of the USAC website as an approved (eligible) product.
- 12- The Bogen PBX Expansion Unit (Multicom) is not being used in a redundant fashion.
- 13- The Bogen PBX Expansion Unit (Multicom) is cost effective.
- 14- The Service Provider is not responsible for any program rule violation.
- 15- Wiring for the installation of single line telephones (material, labor and setup/programming charges) is eligible irrespective of the eligibility of the Bogen PBX Expansion Unit (Multicom) components.

1- The Bogen PBX Expansion Unit (Multicom) is an Eligible Product

Until recently the Bogen PBX Expansion Unit (Multicom) was listed as an eligible product on the Schools and Libraries Web Site (see attached "screen shots" of the listings).

The Bogen PBX Expansion Unit (Multicom) and Rauland are eligible based on the descriptions found in the Eligible Service List on page 15. It states:

"Centralized components that are an essential element in the transport of telephone services within a school or library **are eligible**. This includes:

- Private Branch Exchange (PBX)
- Key System (KSU)
- Wireless
- VoIP Telephony Equipment

It then further states:

"An intercom system that is an integral component of a PBX or other eligible product can be included in the cost of the **eligible** component"

In the Glossary section on page 42 Page a "PBX" is described as:

"A PBX is a centralized telephone switching system located at a business or organization site. The PBX provides internal station-to-station dialing and access to the public switched network."

The Bogen PBX Expansion Unit (Multicom) is functioning as a "Private Branch Exchange (PBX)" and provides internal station-to-station dialing and access to the public switched network and is therefore an eligible product.

2- The Bogen PBX Expansion Unit (Multicom) is Not Redundant

The only reference to "redundant" in the Eligible Services List is the following:

"Products and services are only eligible as Internal Connections if they are an essential element in the transmission of information within the school or library.

The following components are NOT ELIGIBLE:

Components that are installed in standby mode, redundant, not active and online, or otherwise not an essential element in the transmission of information within the school or library "

The applicant determined that the best design for their school was to use two PBX systems that are integrated to function as one system. The reason for this decision was that there are different types of telephones needed in different areas. Some areas need digital or IP based telephones and some areas need standard analog telephones. In order to have the best system for each type of phone they would use two PBXs, each one being the best choice for that type of phone.

The school did not want to find itself in a position where it was going to be forced to use digital or IP telephones in the areas where it specifically wants standard analog telephones. Further, as the industry goes further towards an IP Phone standard the cost of using standard analog telephones is increasing and the capability of those telephones on the IP systems is inferior to the capability of an analog phone on a system that is designed for them.

The Bogen Multicom is designed to work primarily with standard analog telephones. The Bogen Multicom provides the greatest capability at the lowest cost for both the initial installation and maintenance.

The program rules do not indicate a limit on PBXs used. Just as a school may decide, based on its particular needs, to have some 10/100 data switches and some gigabit data switches or some switches that use copper wiring and some that use fiber optics wiring and those switches are not considered redundant so too the school should be able to address it's various telephony needs with two different types of PBXs.

The Bogen PBX Expansion Unit (Multicom) is not a standby or back up system, it is in use and online at all times. It is the exclusive PBX system used for the locations within the school where the Bogen PBX Expansion Unit (Multicom) provides telephone service. There are no locations where the Bogen PBX Expansion Unit (Multicom) is being used in addition to the other PBX. Each location is either on the Panasonic PBX or the Bogen PBX Expansion Unit (Multicom); therefore there it is not redundant.

The design configuration of a "Key System behind a PBX" (both of which are eligible items) is a classic telephony design and has been used in the telephony industry for many years. Although our design is not actually a key system behind a PBX the fact still remains that there is a precedent in the industry to use multiple systems that are integrated in order to provide the best overall product.

3- The Bogen PBX Expansion Unit (Multicom) is Cost Effective

The cost of adding the expansion cards, power supplies, cabinets, distribution cables, blocks, and programming to the Panasonic PBX to provide telephone service for the locations that the Bogen PBX Expansion Unit (Multicom) is providing is similar to the cost of using the Bogen PBX Expansion Unit (Multicom). Therefore the use of the Bogen PBX Expansion Unit (Multicom) is cost effective.

4- The Service Provider is not responsible for any program rule violation

Based on the Funding Commitment Adjustment Explanation the rule violation was the FCC ruling that "funding may be approved only for eligible products and/or services". Neither the service provider nor the school has the power to approve funding, which is the job of the fund administrator.

The Commitment Adjustment Explanation stated "On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support"

The certification at Item 10 of the SPAC form actually states:

"10. I certify that the Service Provider Invoice Forms (FCC Form 474) that are submitted by this Service Provider are based on bills or invoices issued by the service provider to the Service Provider's customers on behalf of schools, libraries, and consortia of those entities as deemed eligible for universal service support by the fund administrator, and exclude any charges previously invoiced to the fund administrator for which the fund administrator has not yet issued a reimbursement decision."

The certification at Item 10 of the SPAC form does not refer to items or services at all, it refers to "bills or invoices". The subject of the phrase "as deemed eligible by the fund administrator" is the entity that is deemed eligible for universal service support by the fund administrator.

In any case, even if items or services were mentioned (as in paragraph 9) and the phrases "as deemed eligible by the fund administrator" were to be referring to those items and services, the language clearly indicates that the determination of eligibility is the responsibility of the fund administrator.

The Applicant (and the Service Provider) must make a good faith effort to submit requests for items and services they understand to be eligible, but the final determination of eligibility is the responsibility of the fund administrator (PIA).

The Funding Commitment Adjustment Explanation seemingly in an effort to enable the applicant to understand their error or to help them do better in the future directs the applicant to "See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List." Yet it is this very list that the school and the service provider made their good faith decision that the products in question are eligible. This included an actual listing of products that the SLC deemed eligible in which the Bogen PBX Expansion Unit (Multicom) was included.

Lacking a specific list of eligible products, which would include the Manufacturer, model and part numbers (which or *extremely specific* eligibility rules, it is an onerous burden to put the Applicant and the Service Provider in a position where they have to take a greater responsibility for eligibility determination than the fund administrator (PIA).

The very fact that the Bogen PBX Expansion Unit (Multicom) could have been considered eligible since the start of the program until now and was actually listed as an eligible product clearly underlines the difficulty of trying to figure out what is eligible, what is not eligible and what might change tomorrow. NOTE: Our understanding, as stated above, is that the Bogen PBX Expansion Unit (Multicom) is eligible based on the eligible services list.

Further, to put the Applicant and the Service provider in a situation where the program can change their minds about eligibility and request funding to be returned, after the Service Provider has purchased and installed the "approved" products and services is an unfair burden. Such a situation could put a small company out of business.

7- Wiring for the installation of single line telephones (material, labor and setup/programming charges) is eligible irrespective of the eligibility of the Bogen PBX Expansion Unit (Multicom) components

The single line telephones used for the classroom telephones and other miscellaneous locations where a standard industry analog telephone is the preferred type of telephone

instrument to be used are currently performing the eligible function of providing internal station-to-station dialing and access to the public switched network.

Therefore the material, labor, and setup/programming charges associated with the wiring and implementation of these telephones (not including the actual phone instrument), which are not an integral component of the Bogen PBX Expansion Unit (Multicom), but were simply included on the same bill of material that made up the FRN(s) in which the Bogen PBX Expansion Unit (Multicom) equipment was included should be excluded from the COMAD(s) listed above irrespective of the eligibility or ineligibility of the Bogen PBX Expansion Unit (Multicom) components.

Based on the information we have provided we request that USAC should discontinue its commitment adjustment and restore the Funding Commitment to its original amount(s).

This ends the copy of the original Letters of Appeal sent to USAC. Based on the arguments presented in the original Letters of Appeal and the ones presented in this Letter of Appeal we ask the Commission to instruct USAC discontinue the Commitment Adjustments for the FRNs listed above and restore the funding commitments to their original amount.

Sincerely,

Jacob Steiner
Prime Security and Communication, Inc.

Attachments:

Copies Administrator's Decision on Appeal received
Copies of Notification of Commitment Adjustment Letter received
Copies of Notice and Proof of Claims For Disability Benefits

DEC 08 2013

NOTICE AND PROOF OF CLAIM FOR DISABILITY BENEFITS

FCC Mail Room

IMPORTANT: USE THIS FORM ONLY WHEN THE CLAIMANT BECOMES SICK OR DISABLED WHILE EMPLOYED OR BECOMES SICK OR DISABLED WITHIN FOUR (4) WEEKS AFTER TERMINATION OF EMPLOYMENT. OTHERWISE USE GREEN CLAIM FORM DB-300.

PART B — HEALTH CARE PROVIDERS STATEMENT (Please Print or Type)

THE HEALTH CARE PROVIDER'S STATEMENT MUST BE FILLED IN COMPLETELY AND THE FORM MAILED TO THE INSURANCE CARRIER OR SELF-INSURED EMPLOYER, OR RETURNED TO THE CLAIMANT WITHIN SEVEN (7) DAYS OF THE RECEIPT OF THE FORM. For item 7d, give approximate date. Make some estimate. If disability is caused by or arising in connection with pregnancy, enter estimated delivery date under "Remarks".

1. Claimant's Name Beatrizoa Weiss 2. Age _____ 3. Sex Male Female
4. Diagnosis/Analysis Left Ankle Fracture Diagnosis Code _____
a. Claimant's Symptoms _____
b. Objective Findings _____

5. Claimant Hospitalized Yes No From ORIF Ankle To _____
6. Operation Indicated Yes No a. Type _____ b. Date _____

7. Enter dates for the following:
a. Date of your first treatment for this disability _____
b. Date of your most recent treatment for this disability _____
c. Date claimant was unable to work because of this disability _____
d. Date claimant will be able to perform usual work _____

MONTH	DAY	YEAR
8	27	2013
9	17	2013
12	15	2013

(Even if considerable question exists, estimate date. Avoid use of terms such as unknown or undetermined.)
8. In your opinion, is this disability the result of injury arising out of and in the course of employment or occupational disease Yes No
If "Yes", has form C-4 been filed with the Workers' Compensation Board Yes No
Remarks (attach additional sheet, if necessary) _____
(If disability is pregnancy related, please enter estimated delivery date.)

I affirm that Chiropractor Physician Psychologist Dentist Podiatrist Nurse — Midwife
Licensed in the State of New York License Number 245955

ANY PERSON WHO KNOWINGLY AND WITH INTENT TO DEFAUD PRESENTS, CAUSES TO BE PRESENTED, OR PREPARES WITH KNOWLEDGE OR BELIEF THAT IT WILL BE PRESENTED TO OR BY AN INSURER, OR SELF-INSURER, ANY INFORMATION CONTAINING ANY FALSE MATERIAL STATEMENT OR CONCEALS ANY MATERIAL FACT SHALL BE GUILTY OF A CRIME AND SUBJECT TO SUBSTANTIAL FINES AND IMPRISONMENT.

Health Care Provider's Signature [Signature] Date 9/12/13
Health Care Provider's Name (Please Print) Louis Amador Tel. No. 914-789-2700
Office Address _____
Number Street City or Town State ZIP Code

HIPAA NOTICE - In order to adjudicate a workers' compensation claim, WCL 13-a(4)(a) and 12 NYCRR 325-1.3 require health care providers to regularly file medical reports of treatment with the Board and the carrier or employer. Pursuant to 45 CFR 164.512 these legally required medical reports are exempt from HIPAA's restrictions on disclosure of health information.

Employer's Name Prime Security Employer's Statement _____ Policy Number 968628
Employer's Address 46 Main Suite 231 Telephone Number 845-356-0018
Employee's Name and Address Beatrizoa Weiss 2 Zitomer St Spring Valley NY 10977

Was the employee provided with the Statement of Rights (Form DB271S) Yes No If "Yes", date _____
is Employee a Member Owner Partner Spouse Employee's Occupation Office
Date of Employment JUNE 107 Full-time Worker Part-time Worker Social Security Number _____
Normal Work Week (Check boxes to show usual days worked) Sun. Mon. Tues. Wed. Thurs. Fri. Sat.
Date Employee Last Worked AUG. 23, 2013 Date Employee Wages Ceased AUG. 22, 2013

Has Employee returned to work Yes No If "Yes", date _____
Has employment terminated Yes No If "Yes", why _____
Are wages being continued during disability _____ Yes No
If "Yes", does Employer request reimbursement _____ Yes No
Was Employee on job when disability occurred _____ Yes No
Has claim been filed for Workers' Compensation _____ Yes No
Name of Workers' Compensation carrier Sentinel I.R.S. COMPANY
Is Employee member of a union that provides for payment of weekly cash benefits Yes No
If "Yes", give name, address and telephone number of union _____

Earnings 8 weeks prior to disability; include weekly value of board, lodging and tips.

Does Employee contribute to cost of this insurance _____ Yes No
If "Yes", is employee contribution the maximum permitted by law Yes No Other \$ _____
Employer tax ID 13-7035 Signed [Signature] Title 1

Jacob Steiner
Prime Security and Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Billed Entity Number: 152310
Form 471 Application Number: 575464
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2011-2012

October 07, 2013

Jacob Stein
Prime Security & Communication, Inc.
46 Main Street, Suite 231
Monsey, NY 10952

Re: Applicant Name:	MOSDOS SANZ KLAUSENBURG OF MONSEY
Billed Entity Number:	16040091
Form 471 Application Number:	803682
Funding Request Number(s):	2178326, 2178351
Decision Letter Date:	June 26, 2013
Date Appeal Postmarked:	September 27, 2013
Your Correspondence Dated:	September 12, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Notification of Commitment Adjustment Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, 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 postmarked within 60 days of the above 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 under the Reference Area/"Appeals" 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.

Schools and Libraries Division
Universal Service Administrative Company

cc: Abraham Spitzer



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2010-2011

October 07, 2013

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street,
Suite 231
Monsey, NY 10952

Re: Applicant Name: YESHIVATH VIZNITZ D'KHAL
TORATH CHAIM
Billed Entity Number: 152310
Form 471 Application Number: 758364
Funding Request Number(s): 2049387
Decision Letter Date: July 16, 2013
Date Appeal Postmarked: September 27, 2013
Your Correspondence Dated: September 12, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Notification of Commitment Adjustment Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

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Schools and Libraries Division
Universal Service Administrative Company

cc: Israel Neiman

Jacob Steiner
Prime Security & Communications, Inc.
46 Main Street, Suite 231
Monsey, NY 10952

Billed Entity Number: 16041028
Form 471 Application Number: 685013
Form 486 Application Number:

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street,
Suite 231
Monsey, NY 10952

Billed Entity Number: 152310
Form 471 Application Number: 758364
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2009-2010

November 08, 2013

Jacob Steiner
Prime Security and Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Re: Applicant Name: YESHIVATH VIZNITZ D'KHAL
TORATH CHAIM
Billed Entity Number: 152310
Form 471 Application Number: 690235
Funding Request Number(s): 1891561, 1891597
Your Correspondence Dated: September 12, 2013

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 2009 Notification of Commitment Adjustment 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): 1891561, 1891597
Decision on Appeal: **Denied**
Explanation:

- After a thorough review, it was determined that funding was provided for the following ineligible products and/or services: maintenance charges on ineligible redundant PBX equipment-Bogen Quantum Multicom equipment, maintenance charges on ineligible redundant PBX units-Bogen Quantum PBX Expansion System and Rauland equipment. The pre-discount cost associated with the ineligible products and/or services is \$11,081.16. At the applicant's 90 percent discount rate, it resulted in an improper commitment of \$9,973.04. FCC rules provide that funding may be approved only for eligible products and/or services. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support.

Therefore, USAC has determined that the service provider is responsible for the rule violation. Accordingly, the commitment was rescinded in full. In your appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.

- FCC rules provide that funding may be approved only for eligible products and services. *See* 47 C.F.R. secs. 54.502, 54.503. The USAC website contains a list of eligible products and services. *See* USAC website, www.usac.org/sl, Eligible Services List. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding request must be denied, otherwise the funding request will be reduced accordingly. *See* 47 C.F.R. sec. 54.504(d). The FCC's Aiken County Public Schools Order directed USAC to permit the applicant 15 calendar days from the date of receipt of notice in writing by USAC to revise its funding request to remove the ineligible services or allow the applicant to provide additional documentation to show why the services are eligible. *See* Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools Aiken, SC, et al., Schools and Libraries Universal Service Support Mechanism, File No. SLD-397612, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8735, FCC 07-61 para. 11 (May 8, 2007).

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. 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 under the Reference Area/"Appeals" 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

cc: Israel Neiman



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2007-2008

October 09, 2013

Jacob Steiner
Prime Security and Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Re: Applicant Name: YESHIVATH VIZNITZ D'KHAL
TORATH CHAIM
Billed Entity Number: 152310
Form 471 Application Number: 575464
Funding Request Number(s): 1590831
Your Correspondence Dated: September 12, 2013

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 2007 Commitment Adjustment 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): 1590831
Decision on Appeal: **Denied**
Explanation:

- After a thorough review, it was determined that funding was provided for the following ineligible products and/or services: Maintenance charges on ineligible redundant PBX equipment-Bogen Quantum Multicom equipment. The pre-discount cost associated with the ineligible products and/or services is \$2,247.00. At the applicant's 90 percent discount rate, it resulted in an improper commitment of \$2,022.30. FCC rules provide that funding may be approved only for eligible products and/or services. Therefore, USAC has determined that the service provider is responsible for the rule violation. Accordingly, the commitment was rescinded in full. In your appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.

- FCC rules provide that funding may be approved only for eligible products and services. See 47 C.F.R. secs. 54.502, 54.503. The USAC website contains a list of eligible products and services. See the website, www.usac.org/sl, Eligible Services List. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding request must be denied, otherwise the funding request will be reduced accordingly. See 47 C.F.R. sec. 54.504(d).

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. 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 under the Reference Area/"Appeals" 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

cc: Israel Neiman

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Billed Entity Number: 152310
Form 471 Application Number: 575464
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2007-2008

October 07, 2013

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Re: Applicant Name: YESHIVATH VIZNITZ D'KHAL
TORATH CHAIM
Billed Entity Number: 152310
Form 471 Application Number: 575464
Funding Request Number(s): 1590899, 1590917
Decision Letter Date: June 27, 2013
Date Appeal Postmarked: September 27, 2013
Your Correspondence Dated: September 12, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Commitment Adjustment Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, 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 postmarked within 60 days of the above 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 under the Reference Area/"Appeals" 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.

Schools and Libraries Division
Universal Service Administrative Company

cc: Israel Neiman

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street, Suite 231
Monsey, NY 10952

Billed Entity Number: 16041028
Form 471 Application Number: 805150
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2009-2010

October 07, 2013

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Re: Applicant Name:	YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number:	152310
Form 471 Application Number:	690235
Funding Request Number(s):	1891197
Decision Letter Date:	July 16, 2013
Date Appeal Postmarked:	September 27, 2013
Your Correspondence Dated:	September 12, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Notification of Commitment Adjustment Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, 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 postmarked within 60 days of the above 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 under the Reference Area/"Appeals" 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.

Schools and Libraries Division
Universal Service Administrative Company

cc: Mr. Israel Neiman

Jacob Steiner
Prime Security & Communications, Inc.
46 Main Street, Suite 231
Monsey, NY 10952

Billed Entity Number: 16041028
Form 471 Application Number: 756208
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2011-2012

October 07, 2013

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Re: Applicant Name: YESHIVATH VIZNITZ D'KHAL
TORATH CHAIM
Billed Entity Number: 152310
Form 471 Application Number: 808014
Funding Request Number(s): 2193578
Decision Letter Date: June 27, 2013
Date Appeal Postmarked: September 27, 2013
Your Correspondence Dated: September 12, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Notification of Commitment Adjustment Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, 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 postmarked within 60 days of the above 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 under the Reference Area/"Appeals" 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.

Schools and Libraries Division
Universal Service Administrative Company

cc: Israel Neiman



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2011-2012

November 08, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: Applicant Name: MOSDOS SANZ KLAUSENBURG OF
MONSEY
Billed Entity Number: 16040091
Form 471 Application Number: 803682
Funding Request Number(s): 2178663
Your Correspondence Dated: September 12, 2013

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 Commitment Adjustment 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): 2178663
Decision on Appeal: **Denied**
Explanation:

- USAC has determined that the Bogen telephone system included within the above funding request is functioning as a redundant service and is ineligible according to the rules of this support mechanism. In your appeal you have verified that you are using two telephone systems to function as one. Program rules state that the Bogen telephone system is eligible if it is the schools only telephone system in use. Therefore, the decision to rescind funding for maintenance on the redundant Bogen telephone system is upheld. Consequently, the appeal is denied.
- FCC rules provide that funding may be approved only for eligible products and services. See 47 C.F.R. secs. 54.502. The USAC website contains a list of

eligible products and services. See USAC website, www.usac.org/sl, Eligible Services List. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding request must be denied, otherwise the funding request will be reduced accordingly. See 47 C.F.R. sec. 54.504(b). The FCC's Aiken County Public Schools Order directed USAC to permit the applicant 15 calendar days from the date of receipt of notice in writing by USAC to revise its funding request to remove the ineligible services or allow the applicant to provide additional documentation to show why the services are eligible. See Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools Aiken, SC, et al., Schools and Libraries Universal Service Support Mechanism, File No. SLD-397612, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8735, FCC 07-61 para. 11 (May 8, 2007).

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. 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 under the Reference Area/"Appeals" 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

cc: Abraham Spitzer



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2011-2012

October 07, 2013

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street, Suite 231
Monsey, NY 10952

Re: Applicant Name:	NS COMMUNITY IMPROVEMENT COUNCIL HEAD START
Billed Entity Number:	16041028
Form 471 Application Number:	805150
Funding Request Number(s):	2182782, 2182805
Decision Letter Date:	June 26, 2013
Date Appeal Postmarked:	September 27, 2013
Your Correspondence Dated:	September 12, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Notification of Commitment Adjustment Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, 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 postmarked within 60 days of the above 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 under the Reference Area/"Appeals" 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.

Schools and Libraries Division
Universal Service Administrative Company

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Billed Entity Number: 152310
Form 471 Application Number: 690235
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2009-2010

October 07, 2013

Jacob Steiner
Prime Security & Communications, Inc.
46 Main Street, Suite 231
Monsey, NY 10952

Re: Applicant Name:	NS COMMUNITY IMPROVEMENT COUNCIL HEAD START
Billed Entity Number:	16041028
Form 471 Application Number:	685013
Funding Request Number(s):	1873584, 1873604, 1873629, 1873658
Decision Letter Date:	June 26, 2013
Date Appeal Postmarked:	September 27, 2013
Your Correspondence Dated:	September 12, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Notification of Commitment Adjustment Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, 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 postmarked within 60 days of the above 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 under the Reference Area/"Appeals" 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.

Schools and Libraries Division
Universal Service Administrative Company

cc: Hindy Diamant

Jacob Stein
Prime Security & Communication, Inc.
46 Main Street, Suite 231
Monsey, NY 10952

Billed Entity Number: 16040091
Form 471 Application Number: 803682
Form 486 Application Number:



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2010-2011

October 07, 2013

Jacob Steiner
Prime Security & Communications, Inc.
46 Main Street, Suite 231
Monsey, NY 10952

Re: Applicant Name:	NS COMMUNITY IMPROVEMENT COUNCIL HEAD START
Billed Entity Number:	16041028
Form 471 Application Number:	756208
Funding Request Number(s):	2043578
Decision Letter Date:	June 26, 2013
Date Appeal Postmarked:	September 27, 2013
Your Correspondence Dated:	September 12, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Notification of Commitment Adjustment Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If you believe there is a basis for further examination of your application, 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 postmarked within 60 days of the above 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 under the Reference Area/"Appeals" 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.

Schools and Libraries Division
Universal Service Administrative Company

cc: Hindy Diamant

Jacob Steiner
Prime Security & Communication, Inc.
46 Main Street
Suite 231
Monsey, NY 10952

Billed Entity Number: 152310
Form 471 Application Number: 808014
Form 486 Application Number:



Universal Service Administrative Company

Schools and Libraries Division

Demand Payment Letter

(Funding Year 2007: July 1, 2007 - June 30, 2008)

August 27, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 575464
Funding Year: 2007
FCC Registration Number:
Applicant Name: YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number: 152310
Applicant Contact Person: Israel Neiman
Payment Due By: 9/26/2013

You were recently sent a Notification of Commitment Adjustment Letter informing you of the need to recover funds from you for the Funding Request Number(s) (FRNs) listed on the Funding Commitment Adjustment Report (Report) attached to the Notification of Commitment Adjustment Letter. A copy of that Report is also attached to this letter.

The balance of this debt is due within 30 days from the date of this letter. Failure to pay the debt within 30 days from the date of this letter could result in interest, late payment fees, administrative charges, and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see "Red Light Frequently Asked Questions (FAQs)" posted on the FCC website at http://www.fcc.gov/debt_collection/faq.html.

If the Universal Service Administrative Company (USAC) has determined that both the applicant and the service provider are responsible for a Program rule violation, then, pursuant to the Order on Reconsideration and Fourth Report and Order (FCC 04-181), USAC will seek recovery of the improperly disbursed amount from BOTH parties and will continue to seek recovery until either or both parties have fully paid the debt. If USAC has determined that both the applicant and the service provider are responsible for a Program rule violation, this was indicated in the Funding Commitment Adjustment Explanation on the Funding Commitment Adjustment Report.

If USAC is attempting to collect all or part of the debt from both the applicant and the service provider, then you should work with the applicant to determine who

will be repaying the debt to avoid duplicate payment. Please note, however, that the debt is the responsibility of both the applicant and service provider. Therefore, you are responsible for ensuring that the debt is paid in a timely manner.

Please remit payment for the full "Funds to be Recovered from Service Provider" amount shown in the Report. To ensure that your payment is properly credited, please include a copy of the Report with your check. Make your check payable to the Universal Service Administrative Company (USAC).

If sending payment by U. S. Postal Service or major courier service (e.g. Airborne, FedEx, and UPS) please send check payments to:

Universal Service Administrative Company
Lock Box 105056
1075 Loop Road
Atlanta, GA 30337
Phone: 404-209-6377

Local messenger service should deliver to the Lockbox Receiving Window at the above address.

Payment is due within 30 days from the date of this letter.

Complete Program information is posted to the SLD section of the USAC website at www.usac.org/sl/. You may also contact the SLD Client Service Bureau by email using the "Submit a Question" link on the SLD website, by fax at 1-888-276-8736 or by phone at 1-888-203-8100.

Universal Service Administrative Company
Schools and Libraries Division

cc: Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 575464

Funding Request Number: 1590899
Services Ordered: INTERNAL CONNECTIONS MNT
SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Contract Number: 758
Billing Account Number:
Site Identifier: 152310
Original Funding Commitment: \$1,146.20
Commitment Adjustment Amount: \$1,146.20
Adjusted Funding Commitment: \$0.00
Funds Disbursed to Date: \$1,146.20
Funds to be Recovered from Service Provider: \$1,146.20
Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Maintenance charges on ineligible redundant Bogen Quantum Multicom equipment. The pre-discount ineligible cost associated with these items is \$1,273.56. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$1,146.20. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

PLEASE SEND A COPY OF THIS PAGE WITH YOUR
CHECK TO ENSURE TIMELY PROCESSING

Funding Request Number: 1590917
Services Ordered: INTERNAL CONNECTIONS MNT
SPIN: 14303017G
Service Provider Name: Prime Security & Communication, Inc
Contract Number: 759
Billing Account Number:
Site Identifier: 152310
Original Funding Commitment: \$1,146.20
Commitment Adjustment Amount: \$1,146.20
Adjusted Funding Commitment: \$0.00
Funds Disbursed to Date: \$1,146.20
Funds to be Recovered from Service Provider: \$1,146.20
Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Maintenance charges on ineligible redundant Bogen Quantum Multicom equipment. The pre-discount cost associated with these items is \$1,273.56. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$1,146.20. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

PLEASE SEND A COPY OF THIS PAGE WITH YOUR
CHECK TO ENSURE TIMELY PROCESSING

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

2007-2008



Notification of Commitment Adjustment Letter

Funding Year 2007: July 1, 2007 - June 30, 2008

August 28, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 575464
Funding Year: 2007
FCC Registration Number:
Applicant Name: YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number: 152310
Applicant Contact Person: Israel Neiman

Our routine review of Schools and Libraries Program funding commitments has revealed certain applications where funds were committed in violation of Program rules.

In order to be sure that no funds are used in violation of Program rules, the Universal Service Administrative Company (USAC) must now adjust the overall funding commitment. The purpose of this letter is to make the required adjustments to the funding commitment, and to give you an opportunity to appeal this decision. USAC has determined the service provider is responsible for all or some of the program rule violations. Therefore, the service provider is responsible to repay all or some of the funds disbursed in error (if any).

This is NOT a bill. If recovery of disbursed funds is required, the next step in the recovery process is for USAC to issue you a Demand Payment Letter. The balance of the debt will be due within 30 days of that letter. Failure to pay the debt within 30 days from the date of the Demand Payment Letter could result in interest, late payment fees, administrative charges and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see "Red Light Frequently Asked Questions (FAQs)" posted on the FCC website at http://www.fcc.gov/debt_collection/faq.html.

TO APPEAL THIS DECISION:

You have the option of filing an appeal with USAC or directly with the Federal Communications Commission (FCC).

If you wish to appeal the Commitment Adjustment Decision indicated in this letter to USAC your appeal must be received or postmarked within 60 days of the date of this letter. If you wish to appeal the Commitment Adjustment Decision indicated in this letter, your appeal must be received 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 email address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify the date of the Notification of Commitment Adjustment Letter and the Funding Request Number(s) (FRN) you are appealing. Your letter of appeal must include the
 - Billed Entity Name,
 - Form 471 Application Number,
 - Billed Entity Number, and
 - FCC Registration Number (FCC RN) from the top of your letter.
3. When explaining your appeal, copy the language or text from the Notification of Commitment Adjustment Letter that is the subject of your appeal to allow USAC to more readily understand your appeal and respond appropriately. 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 USAC's decision. If you are a 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 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
100 S. Jefferson Rd.
P. O. Box 902
Whippany, NJ 07981

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

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 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.

On the pages following this letter, we have provided a Funding Commitment Adjustment Report (Report) for the Form 471 application cited above. The enclosed Report includes the Funding Request Number(s) from your application for which adjustments are necessary. See the "Guide to USAC Letter Reports" posted at <http://usac.org/sl/tools/reference/guide-usac-letter-reports.aspx> for more information on each of the fields in the Report. USAC is also sending this information to the applicant for informational purposes. If USAC has determined the applicant is also responsible for any rule violation on the FRN(s), a separate letter will be sent to the applicant detailing the necessary applicant action.

Note that if the Funds Disbursed to Date amount is less than the Adjusted Funding Commitment amount, USAC will continue to process properly filed invoices up to the Adjusted Funding Commitment amount. Review the Funding Commitment Adjustment Explanation in the attached Report for an explanation of the reduction to the commitment(s). Please ensure that any invoices that you or the applicant(s) submits to USAC are consistent with Program rules as indicated in the Funding Commitment Adjustment Explanation. If the Funds Disbursed to Date amount exceeds the Adjusted Funding Commitment amount, USAC will have to recover some or all of the disbursed funds. The Report explains the exact amount (if any) the service provider is responsible for repaying.

Schools and Libraries Division
Universal Services Administrative Company

cc: Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 575464

Funding Request Number: 1590831✓
Contract Number: 755
Services Ordered: INTERNAL CONNECTIONS MNT
Billing Account Number:
Original Funding Commitment: \$2,022.30
Commitment Adjustment Amount: \$2,022.30
Adjusted Funding Commitment: \$0.00
Funds Disbursed to Date: \$2,022.30
Funds to be Recovered from Service Provider: \$2,022.30

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Maintenance charges on ineligible redundant PBX equipment- Bogen Quantum Multicom equipment. The pre-discount ineligible cost associated with these items is \$2,247.00. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$2,022.30. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.



Notification of Commitment Adjustment Letter

Funding Year 2008: July 1, 2008 - June 30, 2009

August 28, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 620614
Funding Year: 2008
FCC Registration Number:
Applicant Name: YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number: 152310
Applicant Contact Person: Mr. Israel Neiman

Our routine review of Schools and Libraries Program funding commitments has revealed certain applications where funds were committed in violation of Program rules.

In order to be sure that no funds are used in violation of Program rules, the Universal Service Administrative Company (USAC) must now adjust the overall funding commitment. The purpose of this letter is to make the required adjustments to the funding commitment, and to give you an opportunity to appeal this decision. USAC has determined the service provider is responsible for all or some of the program rule violations. Therefore, the service provider is responsible to repay all or some of the funds disbursed in error (if any).

This is NOT a bill. If recovery of disbursed funds is required, the next step in the recovery process is for USAC to issue you a Demand Payment Letter. The balance of the debt will be due within 30 days of that letter. Failure to pay the debt within 30 days from the date of the Demand Payment Letter could result in interest, late payment fees, administrative charges and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see "Red Light Frequently Asked Questions (FAQs)" posted on the FCC website at http://www.fcc.gov/debt_collection/faq.html.

TO APPEAL THIS DECISION:

You have the option of filing an appeal with USAC or directly with the Federal Communications Commission (FCC).

If you wish to appeal the Commitment Adjustment Decision indicated in this letter to USAC your appeal must be received or postmarked within 60 days of the date of this letter. If you wish to appeal the Commitment Adjustment Decision indicated in this letter, your appeal must be received 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 email address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify the date of the Notification of Commitment Adjustment Letter and the Funding Request Number(s) (FRN) you are appealing. Your letter of appeal must include the
 - Billed Entity Name,
 - Form 471 Application Number,
 - Billed Entity Number, and
 - FCC Registration Number (FCC RN) from the top of your letter.
3. When explaining your appeal, copy the language or text from the Notification of Commitment Adjustment Letter that is the subject of your appeal to allow USAC to more readily understand your appeal and respond appropriately. 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 USAC's decision. If you are a 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 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
100 S. Jefferson Rd.
P. O. Box 902
Whippany, NJ 07981

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

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 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.

On the pages following this letter, we have provided a Funding Commitment Adjustment Report (Report) for the Form 471 application cited above. The enclosed Report includes the Funding Request Number(s) from your application for which adjustments are necessary. See the "Guide to USAC Letter Reports" posted at <http://usac.org/sl/tools/reference/guide-usac-letter-reports.aspx> for more information on each of the fields in the Report. USAC is also sending this information to the applicant for informational purposes. If USAC has determined the applicant is also responsible for any rule violation on the FRN(s), a separate letter will be sent to the applicant detailing the necessary applicant action.

Note that if the Funds Disbursed to Date amount is less than the Adjusted Funding Commitment amount, USAC will continue to process properly filed invoices up to the Adjusted Funding Commitment amount. Review the Funding Commitment Adjustment Explanation in the attached Report for an explanation of the reduction to the commitment(s). Please ensure that any invoices that you or the applicant(s) submits to USAC are consistent with Program rules as indicated in the Funding Commitment Adjustment Explanation. If the Funds Disbursed to Date amount exceeds the Adjusted Funding Commitment amount, USAC will have to recover some or all of the disbursed funds. The Report explains the exact amount (if any) the service provider is responsible for repaying.

Schools and Libraries Division
Universal Services Administrative Company

cc: Mr. Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 620614

Funding Request Number: 1709732
Contract Number: 1055
Services Ordered: INTERNAL CONNECTIONS MNT
Billing Account Number:
Original Funding Commitment: \$6,156.00
Commitment Adjustment Amount: \$3,078.00
Adjusted Funding Commitment: \$3,078.00
Funds Disbursed to Date: \$6,156.00
Funds to be Recovered from Service Provider: \$3,078.00

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$3,078.00. During a review, it was determined that funding was provided for the following ineligible items: Maintenance charges on ineligible redundant PBX equipment- Bogen Quantum Multicom equipment. The pre-discount ineligible cost associated with these items is \$3,420.00. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$3,078.00. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been reduced by \$3,078.00 and USAC will seek recovery of any improperly disbursed funds from the service provider.



Universal Service Administrative Company

Schools & Libraries Division

Notification of Commitment Adjustment Letter

Funding Year 2008: July 1, 2008 - June 30, 2009

August 2, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN:	143030176
Service Provider Name:	Prime Security & Communication, Inc
Form 471 Application Number:	620614
Funding Year:	2008
FCC Registration Number:	
Applicant Name	YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number:	152310
Applicant Contact Person:	Mr. Israel Neiman

Our routine review of Schools and Libraries Program funding commitments has revealed certain applications where funds were committed in violation of Program rules.

In order to be sure that no funds are used in violation of Program rules, the Universal Service Administrative Company (USAC) must now adjust the overall funding commitment. The purpose of this letter is to make the required adjustments to the funding commitment, and to give you an opportunity to appeal this decision. USAC has determined the service provider is responsible for all or some of the program rule violations. Therefore, the service provider is responsible to repay all or some of the funds disbursed in error (if any).

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Schools and Libraries Division - Correspondence Unit
100 South Jefferson Road, P.O. Box 902, Whippany, NJ 07981
Visit us online at: www.usac.org/sl

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Schools and Libraries Division
Universal Services Administrative Company

cc: Mr. Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 620614

Funding Request Number: 1709726
Contract Number: 1053
Services Ordered: INTERNAL CONNECTIONS MNT
Billing Account Number:
Original Funding Commitment: \$7,057.04
Commitment Adjustment Amount: \$7,057.04
Adjusted Funding Commitment: \$0.00
Funds Disbursed to Date: \$7,057.04
Funds to be Recovered from Service Provider: \$7,057.04

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible item: Maintenance charges on ineligible redundant PBX units- Bogen Quantum PBX Expansion System and Rauland equipment. The pre-discount ineligible cost associated with these items is \$7,841.16. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$7,057.04. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SFAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952



Universal Service Administrative Company

Schools & Libraries Division

Notification of Commitment Adjustment Letter

Funding Year 2009: July 1, 2009 - June 30, 2010

July 16, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 690235
Funding Year: 2009
FCC Registration Number:
Applicant Name: YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number: 152310
Applicant Contact Person: Mr. Israel Neiman

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Schools & Libraries Division Correspondence Unit
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Whippany, NJ 07981

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Schools and Libraries Division
Universal Services Administrative Company

cc: Mr. Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 690235

Funding Request Number:	1891197
Contract Number:	3083, 3015 3016 3017 3018 3019 3020 3021
Services Ordered:	INTERNAL CONNECTIONS
Billing Account Number:	
Original Funding Commitment:	\$127,741.57
Commitment Adjustment Amount:	\$19,892.89
Adjusted Funding Commitment:	\$107,848.68
Funds Disbursed to Date:	\$127,741.57
Funds to be Recovered from Service Provider:	\$19,892.89

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$19,892.89. During a review, it was determined that funding was provided for the following ineligible items: Redundant Bogen Quantum Multicom equipment and associated maintenance charges. The pre-discount ineligible cost associated with these items is \$22,103.21. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$19,892.89. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been reduced by \$19,892.89 and USAC will seek recovery of any improperly disbursed funds from the service provider.



Universal Service Administrative Company

Schools & Libraries Division

Notification of Commitment Adjustment Letter

Funding Year 2009: July 1, 2009 - June 30, 2010

August 2, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 690235
Funding Year: 2009
FCC Registration Number:
Applicant Name: YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number: 152310
Applicant Contact Person: Mr. Israel Neiman

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Schools and Libraries Division
Universal Services Administrative Company

cc: Mr. Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

03/02/2013

Funding Commitment Adjustment Report
Form 471 Application Number: 690235

Funding Request Number:	1891561
Contract Number:	2073
Services Ordered:	INTERNAL CONNECTIONS MNT
Billing Account Number:	
Original Funding Commitment:	\$6,895.04
Commitment Adjustment Amount:	\$6,895.04
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$6,895.04
Funds to be Recovered from Service Provider:	\$6,895.04

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Maintenance charges on ineligible redundant PBX units- Bogen Quantum Multicom and Rayland equipment. The pre-discount ineligible cost associated with these items is \$7,661.16. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$6,895.04. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

2009-2010



Notification of Commitment Adjustment Letter

Funding Year 2009: July 1, 2009 - June 30, 2010

August 28, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 690235
Funding Year: 2009
FCC Registration Number:
Applicant Name: YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number: 152310
Applicant Contact Person: Mr. Israel Neiman

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Schools and Libraries Division
Universal Services Administrative Company

cc: Mr. Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 690235

Funding Request Number: 1891597
Contract Number: 2074 2075 2076
Services Ordered: INTERNAL CONNECTIONS MNT
Billing Account Number:
Original Funding Commitment: \$21,007.73
Commitment Adjustment Amount: \$3,078.00
Adjusted Funding Commitment: \$17,929.73
Funds Disbursed to Date: \$21,007.71
Funds to be Recovered from Service Provider: \$3,077.98

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$3,078.00. During a review, it was determined that funding was provided for the following ineligible items: Maintenance charges on ineligible redundant PBX equipment - Bogen Quantum Multicom equipment. The pre-discount ineligible cost associated with these items is \$3,420.00. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$3,078.00. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been reduced by \$3,078.00 and USAC will seek recovery of any improperly disbursed funds from the service provider.



Universal Service Administrative Company

Schools & Libraries Division

Notification of Commitment Adjustment Letter

Funding Year 2010: July 1, 2010 - June 30, 2011

July 16, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 758364
Funding Year: 2010
FCC Registration Number:
Applicant Name: YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number: 152310
Applicant Contact Person: Israel Neiman

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1. Include the name, address, telephone number, fax number, and email address (if available) for the person who can most readily discuss this appeal with us.
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 - Billed Entity Name,
 - Form 471 Application Number,
 - Billed Entity Number, and
 - FCC Registration Number (FCC RN) from the top of your letter.
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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
100 S. Jefferson Rd.
P. O. Box 902
Whippany, NJ 07981

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Note that if the Funds Disbursed to Date amount is less than the Adjusted Funding Commitment amount, USAC will continue to process properly filed invoices up to the Adjusted Funding Commitment amount. Review the Funding Commitment Adjustment Explanation in the attached Report for an explanation of the reduction to the commitment(s). Please ensure that any invoices that you or the applicant(s) submits to USAC are consistent with Program rules as indicated in the Funding Commitment Adjustment Explanation. If the Funds Disbursed to Date amount exceeds the Adjusted Funding Commitment amount, USAC will have to recover some or all of the disbursed funds. The Report explains the exact amount (if any) the service provider is responsible for repaying.

Schools and Libraries Division
Universal Services Administrative Company

cc: Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 758364

Funding Request Number:	2049387
Contract Number:	3120, 3123, 3124, 3125
Services Ordered:	INTERNAL CONNECTIONS MNT
Billing Account Number:	
Original Funding Commitment:	\$105,314.26
Commitment Adjustment Amount:	\$3,600.00
Adjusted Funding Commitment:	\$101,714.26
Funds Disbursed to Date:	\$105,314.26
Funds to be Recovered from Service Provider:	\$3,600.00

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$3,600.00. During a review, it was determined that funding was provided for the following ineligible items: Maintenance for redundant Bogen Quantum Multicom expansion equipment. The pre-discount cost associated with these items is \$4,000.00, for a total ineligible amount of \$4,000.00. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$3,600.00. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment must be reduced by \$3,600.00 and USAC will seek recovery of any improperly disbursed funds from the service provider.

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

2010-2011



Notification of Commitment Adjustment Letter

Funding Year 2010: July 1, 2010 - June 30, 2011

July 16, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 758364
Funding Year: 2010
FCC Registration Number:
Applicant Name: YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number: 152310
Applicant Contact Person: Israel Neiman

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In order to be sure that no funds are used in violation of Program rules, the Universal Service Administrative Company (USAC) must now adjust the overall funding commitment. The purpose of this letter is to make the required adjustments to the funding commitment, and to give you an opportunity to appeal this decision. USAC has determined the service provider is responsible for all or some of the program rule violations. Therefore, the service provider is responsible to repay all or some of the funds disbursed in error (if any).

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Schools and Libraries Division
Universal Services Administrative Company

cc: Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 758364

Funding Request Number: 2049387
Contract Number: 3120, 3123, 3124, 3125
Services Ordered: INTERNAL CONNECTIONS MNT
Billing Account Number:
Original Funding Commitment: \$105,314.26
Commitment Adjustment Amount: \$3,600.00
Adjusted Funding Commitment: \$101,714.26
Funds Disbursed to Date: \$105,314.26
Funds to be Recovered from Service Provider: \$3,600.00

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$3,600.00. During a review, it was determined that funding was provided for the following ineligible items: Maintenance for redundant Bogen Quantum Multicom expansion equipment. The pre-discount cost associated with these items is \$4,000.00, for a total ineligible amount of \$4,000.00. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$3,600.00. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment must be reduced by \$3,600.00 and USAC will seek recovery of any improperly disbursed funds from the service provider.



Universal Service Administrative Company

Schools and Libraries Division

Demand Payment Letter

(Funding Year 2011: July 1, 2011 - June 30, 2012)

August 27, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN:	143030176
Service Provider Name:	Prime Security & Communication, Inc
Form 471 Application Number:	808014
Funding Year:	2011
FCC Registration Number:	
Applicant Name:	YESHIVATH VIZNITZ D'KHAL TORATH CHAIM
Billed Entity Number:	152310
Applicant Contact Person:	Israel Neiman
Payment Due By:	9/26/2013

You were recently sent a Notification of Commitment Adjustment Letter informing you of the need to recover funds from you for the Funding Request Number(s) (FRNs) listed on the Funding Commitment Adjustment Report (Report) attached to the Notification of Commitment Adjustment Letter. A copy of that Report is also attached to this letter.

The balance of this debt is due within 30 days from the date of this letter. Failure to pay the debt within 30 days from the date of this letter could result in interest, late payment fees, administrative charges, and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see "Red Light Frequently Asked Questions (FAQs)" posted on the FCC website at http://www.fcc.gov/debt_collection/faq.html.

If the Universal Service Administrative Company (USAC) has determined that both the applicant and the service provider are responsible for a Program rule violation, then, pursuant to the Order on Reconsideration and Fourth Report and Order (FCC 04-181), USAC will seek recovery of the improperly disbursed amount from BOTH parties and will continue to seek recovery until either or both parties have fully paid the debt. If USAC has determined that both the applicant and the service provider are responsible for a Program rule violation, this was indicated in the Funding Commitment Adjustment Explanation on the Funding Commitment Adjustment Report.

If USAC is attempting to collect all or part of the debt from both the applicant and the service provider, then you should work with the applicant to determine who

will be repaying the debt to avoid duplicate payment. Please note, however, that the debt is the responsibility of both the applicant and service provider. Therefore, you are responsible for ensuring that the debt is paid in a timely manner.

Please remit payment for the full "Funds to be Recovered from Service Provider" amount shown in the Report. To ensure that your payment is properly credited, please include a copy of the Report with your check. Make your check payable to the Universal Service Administrative Company (USAC).

If sending payment by U. S. Postal Service or major courier service (e.g. Airborne, FedEx, and UPS) please send check payments to:

Universal Service Administrative Company
Lock Box 105056
1075 Loop Road
Atlanta, GA 30337
Phone: 404-209-6377

Local messenger service should deliver to the Lockbox Receiving Window at the above address.

Payment is due within 30 days from the date of this letter.

Complete Program information is posted to the SLD section of the USAC website at www.usac.org/sl/. You may also contact the SLD Client Service Bureau by email using the "Submit a Question" link on the SLD website, by fax at 1-888-276-8736 or by phone at 1-888-203-8100.

Universal Service Administrative Company
Schools and Libraries Division

cc: Israel Neiman
YESHIVATH VIZNITZ D'KHAL TORATH CHAIM

Funding Commitment Adjustment Report
Form 471 Application Number: 808014

Funding Request Number:	2193578
Services Ordered:	INTERNAL CONNECTIONS MNT
SPIN:	143030176
Service Provider Name:	Prime Security & Communication, Inc
Contract Number:	4123
Billing Account Number:	
Site Identifier:	
Original Funding Commitment:	152310
Commitment Adjustment Amount:	\$9,062.71
Adjusted Funding Commitment:	\$9,062.71
Funds Disbursed to Date:	\$0.00
Funds to be Recovered from Service Provider:	\$9,062.71
Funding Commitment Adjustment Explanation:	\$9,062.71

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Maintenance charges on ineligible redundant Bogen Quantum Multicom equipment. The pre-discount cost associated with these items is \$10,069.68. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$9,062.71. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

PLEASE SEND A COPY OF THIS PAGE WITH YOUR
CHECK TO ENSURE TIMELY PROCESSING

Schools and Libraries Division

10/27/2014

10/27/2014



Universal Service Administrative Company

Schools & Libraries Division

Notification of Commitment Adjustment Letter

Funding Year 2011: July 1, 2011 - June 30, 2012

June 26, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 803682
Funding Year: 2011
FCC Registration Number:
Applicant Name: MOSDOS SANZ KLAUSENBURG OF MONSEY
Billed Entity Number: 16040091
Applicant Contact Person: Abraham Spitzer

Our routine review of Schools and Libraries Program funding commitments has revealed certain applications where funds were committed in violation of Program rules.

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Schools and Libraries Division
Universal Services Administrative Company

cc: Abraham Spitzer
MOSDOS SANZ KLAUSENBURG OF MONSEY

Funding Commitment Adjustment Report
Form 471 Application Number: 803682

Funding Request Number:	2178326
Contract Number:	N/A
Services Ordered:	INTERNAL CONNECTIONS
Billing Account Number:	
Original Funding Commitment:	\$15,458.12
Commitment Adjustment Amount:	\$15,458.12
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$15,458.12
Funds to be Recovered from Service Provider:	\$15,458.12

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible item: Bogen PBX Expansion Unit. The pre-discount cost associated with this item is \$17,175.69. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$15,458.12. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

Funding Request Number:	2178351
Contract Number:	N/A
Services Ordered:	INTERNAL CONNECTIONS MNT
Billing Account Number:	
Original Funding Commitment:	\$1,302.05
Commitment Adjustment Amount:	\$1,302.05
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$1,302.05
Funds to be Recovered from Service Provider:	\$1,302.05

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible item: Bogen PBX Expansion Unit Maintenance. The pre-discount cost associated with this item is \$1,446.72. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$1,302.05. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

Jacob Steiner

Prime Security & Communication, Inc

46 Main Street

Suite 231

Monsey, NY 10952



Notification of Commitment Adjustment Letter

Funding Year 2011: July 1, 2011 - June 30, 2012

June 26, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 805150
Funding Year: 2011
FCC Registration Number:
Applicant Name: NS COMMUNITY IMPROVEMENT COUNCIL HEAD START
Billed Entity Number: 16041028
Applicant Contact Person: Hindy Diamant

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Letter of Appeal
Schools and Libraries Division - Correspondence Unit
100 S. Jefferson Rd.
P. O. Box 902
Whippany, NJ 07981

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Note that if the Funds Disbursed to Date amount is less than the Adjusted Funding Commitment amount, USAC will continue to process properly filed invoices up to the Adjusted Funding Commitment amount. Review the Funding Commitment Adjustment Explanation in the attached Report for an explanation of the reduction to the commitment(s). Please ensure that any invoices that you or the applicant(s) submits to USAC are consistent with Program rules as indicated in the Funding Commitment Adjustment Explanation. If the Funds Disbursed to Date amount exceeds the Adjusted Funding Commitment amount, USAC will have to recover some or all of the disbursed funds. The Report explains the exact amount (if any) the service provider is responsible for repaying.

Schools and Libraries Division
Universal Services Administrative Company

cc: Hindy Diamant
NS COMMUNITY IMPROVEMENT COUNCIL HEAD START

Funding Commitment Adjustment Report
Form 471 Application Number: 805150

Funding Request Number: 2182782
Contract Number: na
Services Ordered: INTERNAL CONNECTIONS MNT
Billing Account Number:
Original Funding Commitment: \$6,029.21
Commitment Adjustment Amount: \$2,120.56
Adjusted Funding Commitment: \$3,908.65
Funds Disbursed to Date: \$6,029.21
Funds to be Recovered from Service Provider: \$2,120.56

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$2,120.56. During a review, it was determined that funding was provided for the following ineligible items: Basic Maintenance for a Bogen Expansion PBX unit that is functioning as a redundant PEX system. The pre-discount cost associated with this is \$2,356.18. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$2,120.56. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been reduced by \$2,120.56 and USAC will seek recovery of any improperly disbursed funds from the service provider.

Funding Request Number:	2182805
Contract Number:	na
Services Ordered:	INTERNAL CONNECTIONS MNT
Billing Account Number:	
Original Funding Commitment:	\$6,433.67
Commitment Adjustment Amount:	\$2,120.56
Adjusted Funding Commitment:	\$4,313.11
Funds Disbursed to Date:	\$6,433.67
Funds to be Recovered from Service Provider:	\$2,120.56

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$2,120.56. During a review, it was determined that funding was provided for the following ineligible items: Basic Maintenance for a Bogen Expansion PBX unit that is functioning as a redundant PBX system. The pre-discount cost associated with this is \$2,356.18. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$2,120.56. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been reduced by \$2,120.56 and USAC will seek recovery of any improperly disbursed funds from the service provider.

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952



Notification of Commitment Adjustment Letter

Funding Year 2009: July 1, 2009 - June 30, 2010

June 26, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 685013
Funding Year: 2009
FCC Registration Number:
Applicant Name NS COMMUNITY IMPROVEMENT COUNCIL HEAD START
Billed Entity Number: 16041028
Applicant Contact Person: Hindy Diamant

Our routine review of Schools and Libraries Program funding commitments has revealed certain applications where funds were committed in violation of Program rules.

In order to be sure that no funds are used in violation of Program rules, the Universal Service Administrative Company (USAC) must now adjust the overall funding commitment. The purpose of this letter is to make the required adjustments to the funding commitment, and to give you an opportunity to appeal this decision. USAC has determined the service provider is responsible for all or some of the program rule violations. Therefore, the service provider is responsible to repay all or some of the funds disbursed in error (if any).

This is NOT a bill. If recovery of disbursed funds is required, the next step in the recovery process is for USAC to issue you a Demand Payment Letter. The balance of the debt will be due within 30 days of that letter. Failure to pay the debt within 30 days from the date of the Demand Payment Letter could result in interest, late payment fees, administrative charges and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see "Red Light Frequently Asked Questions (FAQs)" posted on the FCC website at http://www.fcc.gov/debt_collection/faq.html.

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1. Include the name, address, telephone number, fax number, and email address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify the date of the Notification of Commitment Adjustment Letter and the Funding Request Number(s) (FRN) you are appealing. Your letter of appeal must include the
 - Billed Entity Name,
 - Form 471 Application Number,
 - Billed Entity Number, and
 - FCC Registration Number (FCC RN) from the top of your letter.
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Schools and Libraries Division
Universal Services Administrative Company

cc: Hindy Diamant
NS COMMUNITY IMPROVEMENT COUNCIL HEAD START

Funding Commitment Adjustment Report
Form 471 Application Number: 685013

Funding Request Number: 1873629
Contract Number: 2059
Services Ordered: INTERNAL CONNECTIONS
Billing Account Number:
Original Funding Commitment: \$20,779.40
Commitment Adjustment Amount: \$20,779.40
Adjusted Funding Commitment: \$0.00
Funds Disbursed to Date: \$20,779.40
Funds to be Recovered from Service Provider: \$20,779.40

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Bogen Expansion PBX unit that is functioning as a redundant PBX system because. The pre-discount cost associated with this is \$23,088.22. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$20,779.40. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

Funding Request Number:	1873584
Contract Number:	2057
Services Ordered:	INTERNAL CONNECTIONS
Billing Account Number:	
Original Funding Commitment:	\$20,779.40
Commitment Adjustment Amount:	\$20,779.40
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$20,779.40
Funds to be Recovered from Service Provider:	\$20,779.40

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Bogen Expansion PBX unit that is functioning as a redundant PBX system. The pre-discount cost associated with this is \$23,088.22. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$20,779.40. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

Funding Request Number:	1873604
Contract Number:	2058
Services Ordered:	INTERNAL CONNECTIONS MNT
Billing Account Number:	
Original Funding Commitment:	\$1,826.50
Commitment Adjustment Amount:	\$1,826.50
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$1,826.50
Funds to be Recovered from Service Provider:	\$1,826.50

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Basic Maintenance for a Bogen Expansion PBX unit that is functioning as a redundant PBX system. The pre-discount cost associated with this is \$2,029.44. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$1,826.50. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

Funding Request Number:	1873658
Contract Number:	2060
Services Ordered:	INTERNAL CONNECTIONS MNT
Billing Account Number:	
Original Funding Commitment:	\$1,826.50
Commitment Adjustment Amount:	\$1,826.50
Adjusted Funding Commitment:	\$0.00
Funds Disbursed to Date:	\$1,826.50
Funds to be Recovered from Service Provider:	\$1,826.50

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be rescinded in full. During a review, it was determined that funding was provided for the following ineligible items: Basic Maintenance for a Bogen Expansion PBX unit that is functioning as a redundant PBX system because it is in addition to the primary Hybrid IP PBX system. The pre-discount cost associated with this is \$2,029.44. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$1,826.50. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been rescinded in full and USAC will seek recovery of any improperly disbursed funds from the service provider.

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952



Notification of Commitment Adjustment Letter

Funding Year 2010: July 1, 2010 - June 30, 2011

June 26, 2013

Jacob Steiner
Prime Security & Communication, Inc
46 Main Street
Suite 231
Monsey, NY 10952

Re: SPIN: 143030176
Service Provider Name: Prime Security & Communication, Inc
Form 471 Application Number: 756208
Funding Year: 2010
FCC Registration Number:
Applicant Name: NS COMMUNITY IMPROVEMENT COUNCIL HEAD START
Billed Entity Number: 16041028
Applicant Contact Person: Hindy Diamant

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Schools and Libraries Division
Universal Services Administrative Company

cc: Hindy Diamant
NS COMMUNITY IMPROVEMENT COUNCIL HEAD START

Funding Commitment Adjustment Report
Form 471 Application Number: 756208

Funding Request Number: 2043578
Contract Number: 3316, 3317, 3318, 3319, 3320, 3322, 3323
Services Ordered: INTERNAL CONNECTIONS MNT
Billing Account Number:
Original Funding Commitment: \$13,281.84
Commitment Adjustment Amount: \$4,081.30
Adjusted Funding Commitment: \$9,200.54
Funds Disbursed to Date: \$13,281.84
Funds to be Recovered from Service Provider: \$4,081.30

Funding Commitment Adjustment Explanation:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$4,081.30. During a review, it was determined that funding was provided for the following ineligible items: Basic Maintenance for a Bogen Expansion PBX unit that is functioning as a redundant PBX system. The pre-discount cost associated with this is \$4,534.78. At the applicants 90 percent discount rate, this resulted in an improper commitment of \$4,081.30. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, www.usac.org/sl/about/eligible-services-list.aspx for the Eligible Services List. On the SPAC Form, the authorized person certifies at Item 10 that the service provider has billed its customer for services deemed eligible for support. Therefore, USAC has determined that the service provider is responsible for this rule violation. Accordingly, the commitment has been reduced by \$4,081.30 and USAC will seek recovery of any improperly disbursed funds from the service provider.