



P. O. Box 763, Hingham, MA 02043-0763

January 1, 2014
CC Docket 02-6
Federal Communications Commission

To whom it may concern:

This is an appeal of a USAC Administrator's Decision on Appeal - Funding Year 2012-2013, dated November 11, 2013 (attached). The appeal is in regards to Form 471 Application Number 829975 for FRNs 2305700, 2305706.

The applicant in this filing is St. John School, Boston, Massachusetts and the contact for the filing is R&R Consultants.

The applicant changed Service Providers for Telephone service prior to the start date of Erate FY 2012 (July 1, 2012), however, the Form 471 for FY 2012 filing incorrectly used the SPIN of the prior Service Providers. This data entry error could, and should, have been cured with the filing of a **Corrective** SPIN change, as provided in USAC instructions.

Rather, the initial SPIN change format used was that of an **Operational** SPIN change, which was rejected by USAC.

Within the allowable time frame, the applicant then re-filed two SPIN changes using the correct format; that of a **Corrective** SPIN change, dated October 31, 2013 (attached).

USAC considered the **Corrective** SPIN changes to be an appeal of their decision denying the initial **Operational** SPIN changes and rejected the filing for exceeding the 60 day limit for filing appeals. We acknowledge this fact, however the applicant assumed that the initial (**Operational**) SPIN change filings were invalid, making the filing of an Appeal unnecessary, and thus the subsequent (**Corrective**) SPIN changes would suffice as an initial SPIN change request.

Under USAC guidelines, the correction of a data entry error can be made with the filing of a **Corrective** SPIN change. We would ask that the FCC allow the acceptance of the **Corrective** SPIN changes, as shown in the attached file.

If there are any questions please contact me at erate@r-rconsultants.com.
Thank you,

Susan Fagundus
R&R Consultants
PO Box 763,
Hingham, MA 02043-0763
781-828-3871