Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
Modernizing the E-rate Program	)	CC Docket No. 13-184
For Schools and Libraries	)	
	)	

COMMENTS OF AT&T

AT&T provides the following comments in response to the Commission's recent Public Notice in the above-captioned docket.[1]

I. The Commission Should Prioritize Funding for Broadband Deployment and Internal Connections that Support Broadband Connectivity.

AT&T agrees that the Commission should modernize the E-rate program to help ensure that our nation's students and communities have ubiquitous access to high-speed broadband connections. To that end, the Commission should prioritize funding for high speed broadband and the internal connections to schools and libraries that, to-date, have inadequate (or no) broadband connectivity or insufficient internal connections networks. AT&T agrees that the additional $2 billion proposed in the *Public Notice* should be used for these purposes and would be a catalyst to transition E-rate from a telecommunications and Internet program to a broadband program.

As AT&T stated in its initial Comments, the Commission could prioritize funding for schools and libraries with inadequate broadband by creating a fund that operates outside of the existing discount hierarchy to provide such schools and libraries with an express lane to the

[1] *Wireline Competition Bureau Seeks Focused Comment on E-rate Modernization*, WC Docket 13-184, DA 14-308, released March 6, 2014 ("*Public Notice*").

funds necessary to acquire broadband services.[2] By creating a separate fund for infrastructure deployment, the FCC could ensure that schools and libraries that currently are unserved or underserved by broadband have the necessary funding to acquire broadband services.

Furthermore, as AT&T stated previously, whatever approach the Commission implements to prioritize broadband connectivity to schools and libraries, the program must be administered with technology neutral principles.[3] The Public Notice seeks comment on the scope of services that should be funded to provide high speed broadband, both to and within schools and libraries, and goes so far as to request comment on what specific equipment is necessary to transmit broadband throughout buildings. The Commission's approach here is too narrow. Because of significant geographical and topographical diversity among the nation's schools and libraries, there is no one technological solution that will best meet the needs of all such institutions. Consequently, fiber, wireless LTE, hybrid copper/fiber, and satellite, should all be among the available technology platforms that are permitted to compete for schools and libraries' broadband connectivity requirements.

Several commenters suggest that wireless data should not be eligible based on their perception of current costs.[4] However, this is not a sufficient basis to bar a viable service from competing with other platforms to achieve the program's broadband goals. Indeed, LTE service may provide the lowest-cost broadband solution for high cost areas and provides the additional benefit of positioning E-rate applicants for mobile learning applications. (*See* Section V below).

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[2] *See* Comments of AT&T, filed in WC Docket No. 13-184 on September 16, 2013 at p. 4.

[3] *Id*. at p. 4-5.

[4] *See* E-rate Provider Services Comments filed in WC Docket 13-186 on September 16, 2013 at. p. 7; *See generally*, Reply Comments Of The Fiber To The Home Council Americas, filed in WC Docket 13-186 on November 8, 2013.

Just as the Commission should allow market forces to dictate which technology represents the best solution for a given school or library, so, too, should it allow flexibility in the choice of equipment and software that can be used to deliver the broadband service throughout the campus or building(s). Here, again, the competitive bidding process will identify which equipment and software represent the best, most cost-effective solution for any particular school or library, and building flexibility into the process will enable schools and libraries to access the latest, most cutting edge technology solutions. In contrast, any list of Commission-approved equipment will be obsolete before the ink is dry on the order approving that list. To avoid this pitfall and to maximize the options available to schools and libraries, the Commission should establish standards that enable and facilitate the purchase of high-speed broadband both to and within schools and libraries, and allow the schools and libraries, using the applicable competitive bidding requirements, to select the most cost-effective solution from all of the available technologies and architectures.

II. The Commission Should Include All Aspects of the E-rate Process In Its Streamlining Review.

The Commission also seeks comment on how to minimize the administrative burdens and overhead associated with applying for and receiving funding. AT&T agrees that there are opportunities to streamline the administration of the E-rate program, e.g., eliminating service providers from the BEAR disbursement process as proposed in the NPRM. But the downstream processes that are essential for applicants receiving the benefit of the E-rate discount depend today on the availability of timely and accurate information. As a result, it is essential that, as the FCC reviews proposals to streamline the application process, it take into account the impact of those proposals on any downstream processes, and, in particular, on the information requirements for those processes.

The Commission must keep in mind that it takes far more than an Application and a Funding Commitment Decision Letter (FCDL) to make the E-rate program work. Both the invoicing and USAC's compliance processes are vital parts of the E-rate program, and the quality and efficiency of these processes are heavily dependent on the quality of information provided in the application process. Even today, much of the detailed information needed from the application process is frequently omitted by the applicants. For example the Service Provider Invoice (SPI) process, which includes not only invoicing USAC but also applying the E-rate discount on the service providers' bills, requires information that is requested on Item 21 of the Form 471, yet, applications are accepted and funding is approved without this necessary information. Other information, such as, billing account numbers, the Funding Request Numbers (FRNs) funded for each billing account number, and the discount percentages based on the eligibility of the services and/or locations, is likewise critical for the SPI process but is not even requested in the E-rate application process.[5] Therefore, before discounts can be applied to bills, the service provider and applicants must undertake very time consuming and resource intensive verification processes, after the application is accepted and the FCDL is issued, to ensure that the service provider applies the correct discount and to ensure the discount is only applied to services included in the applicable FRN.[6] While AT&T's SPI process ensures that AT&T applies the discounts correctly, the process often takes two to three months to complete, which delays the implementation of the discounts and the submission of the corresponding invoices to USAC.

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[5] Previous versions of the forms included information that helped facilitate these processes. For example, a previous version of the Form 470 included an Item 7 that required the applicant to provide the term requirements for the services being requested by indicating month-to-month, tariff, or multi-year.

[6] See Attachment A – AT&T's E-rate Welcome package. AT&T requires applicants to complete these forms before AT&T implements the E-rate discount on its bills. Once complete, these spreadsheets can include hundreds of rows of information.

Some of the same information that is required for the SPI process, such as billing account numbers by FRN and discount calculation validation, is needed by USAC to complete its Program Integrity Assurance reviews, Payment Quality Assurance reviews or Beneficiary audits. AT&T is unable to respond to these requests on a timely basis (or at all), when applicants fail to provide the information in the SPI process or when applicants utilize the BEAR invoicing process (in which case, the Service Provider has no insight into the services or discount calculations that applicants may have used in their BEAR invoices). The requirement for these types of information must be addressed as the Commission considers any proposals to further streamline the program's processes.

III. The Commission Should Further Streamline The Funding Disbursement Process.

All the detailed information described above, and the effort and expense it takes to collect, verify, and audit the accuracy of that information, would not be necessary if E-rate funding was provided directly to schools and libraries rather than being funneled through service providers. The FCC has already proposed to send BEAR payments directly to applicants.[7] It should take the next step and do the same with all E-rate funds and allow schools and libraries to use E-rate funds to pay their service providers directly.[8]

While putting a discount on a phone bill might have sounded simple and rationale in 1996, it is not at all simple when large schools districts are purchasing complicated multi-element services for numerous locations that generate bills hundreds of pages in length. The current SPI discounting structure imposes real costs on USAC as well as service providers.

[7] *See Modernizing the E-rate Program for Schools and Libraries*, Notice of Proposed Rulemaking, WC Docket No. 13-184 (rel. July 23, 2013) at ¶ 259.

[8] *See* Comments of AT&T at pp. 13-14.

Rather than hire more auditors to spend hours tracing the path of dollars and discounts from USAC to the applicant via the labyrinth of service provider bills and back again, the FCC could improve program compliance, significantly streamline the disbursement process and save money by taking service providers out of the middle of flow of E-rate funding.[9]

IV. The Commission Should Phase Out Funding for Voice Services.

As stated above, AT&T agrees that the Commission should refocus the E-rate program on supporting high speed broadband to and within schools and libraries, while eliminating support for services that do not advance the deployment of broadband, such as voice telephony services. The Public Notice seeks comment on ways to reduce support for voice services but does not distinguish TDM-based (telephony) voice service from voice over Internet protocol (VoIP) service for this purpose; so it is not entirely clear what is intended. AT&T suggests the Commission phase out support for telephony voice and VoIP services on different schedules. Specifically, AT&T suggests the Commission phase out telephony voice services on an accelerated schedule, e.g. three years or less, so that support for those services can be repurposed to supporting broadband. On the other hand, the program could support VoIP services for a longer transition period, e.g. five years, as a way of increasing incentives for schools and libraries to substitute broadband technologies for legacy technologies. Ultimately, AT&T agrees that voice services of all kinds should no longer be eligible for E-rate discounts.

AT&T does not have a preference for the methodology the Commission chooses to phase-out these services; however, if the Commission elects to gradually reduce the discount percentage for these services, it should consider how this change will impact service providers who have to accommodate the discount on their bills. For example, portions of AT&T's

[9] Other processes would also benefit from this streamlined approach. For example, USAC's Good Samaritan disbursement process could be completely eliminated if it were permitted to provide funds directly to the applicants.

discount processes are mechanized and these systems can only apply one discount percentage for each FRN. Therefore, AT&T could accommodate a gradual reduction of the discount percentage for voice services on a mechanized basis but only if applicants obtain a unique FRN for any service that requires a different discount percentage.[10]

V. The Commission Should Fund Demonstration Projects If Applicants Demonstrate A Need.

The Commission also seeks comment on whether it should provide funding for demonstration projects aimed at identifying and testing different approaches to meet broadband needs.[11] AT&T generally supports demonstration projects or technology trials. However, given the limited resources currently available to the program, the Commission should set aside only limited funding for these initiatives and should ensure that these projects are well-defined and are focused on delivering broadband to and/or within schools and libraries, or off-campus for educational purposes. In addition, any projects must be limited in duration to ensure the results are shared on a timely basis so that others many benefit from the projects.

VI. The E-rate Program Should Support Off-Campus Mobile Learning.

Although the Public Notice did not seek comment on the eligibility of off-campus broadband access, AT&T urges the Commission to address the eligibility of off-campus mobile broadband connectivity as it transforms the eligible service list to refocus the program on broadband and optimize the educational benefit of broadband access. Today's educational systems increasingly require students to have access to information outside of the classroom to implement educational models such as blended learning, flipped learning and alternative school

[10] This example demonstrates how a seemingly easy adjustment to the program could add significant administrative costs to service providers. The FCC could avoid these issues and reduce the compliance cost of the program by providing funding directly to schools and libraries, so they, in turn, can pay their service providers. (*See* supra Section III).

[11] Public Notice at ¶56.

formats. Thus, learning can no longer be confined within the walls of a school at specified times in the day. As a result, AT&T, as well as other providers, has developed methods to ensure school-owned mobile learning devices only have access to educationally appropriate content, a concern the FCC has raised in the past. With this issue behind us, E-rate support for off-campus wireless broadband access could almost instantaneously lessen the "digital divide" between students that have broadband Internet access at home and those that do not.

Indeed the evaluation results from the *Make Learning Mobile* projects indicate that student usage of mobile-broadband equipped tablets remarkably enhanced the learning experiences both on and off-campus. For example, the Falconer Elementary School report indicates that students did more online research, played more educational games, [and] communicated more with classmates and their teacher . . . than they had first envisioned."[12] This evaluation also noted that "three-quarters of the device requests for access to learning or academic websites occurred between 3:00 pm and 9:00 pm."[13] Similarly, the Stone Middle School report indicates that homework completion rates increased, and students developed stronger research skills due to the accessibility of the tablets.[14] Thus, there can be no question that off-campus mobile broadband access can serve an educational purpose that could dramatically improve educational outcomes. As a result, the Commission should permit E-rate funds to be used for off-campus mobile broadband connectivity.

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[12] *See* Qualcomm Ex Parte, dated January 13, 2014 filed in GN Docket 09-51 and CC Docket No.02-6, Making Learning Mobile 1.0 – Falconer Elementary School Project Evaluation Results at p. 5.

[13] *Id*. at p. 7.

[14] *Id*. Making Learning Mobile 1.0 – Stone Middle School Project Evaluation Results at p. 7.

VII. CONCLUSION

As discussed above, the E-rate program's focus should be on broadband connectivity, and the Commission should ensure that all services and/or technologies that are capable of providing broadband connectivity to, within, and off-campus are eligible for E-rate funding.

Respectfully submitted,

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Its Attorneys

April 7, 2014

ATTACHMENT A

Dear Customer and E-Rate Applicant,

Welcome to the E-Rate Fund Year 2013. AT&T Ohio - Ohio Bell Telephone Company has received notification from the SLD that at least one FRN on your E-Rate Funding Application for SPIN 143001688 has been approved for Fund Year 2013 (which begins on July 1, 2013).

Attached to this email is the document that allows AT&T to timely process your requests for either BEAR (Billed Entity Applicant Reimbursement) or SPI (Service Provider Invoice) disbursements of your funding. Please take the time to read the attached instructions and indicate your choice of disbursement method on the certification page, then complete the appropriate section based on your selection.

Finally, we would like to remind you to submit the Form 486 to the SLD within the required time frame, as delays can impact your funding. The USAC does not provide any disbursement of funds until they have received and approved your Form 486. AT&T will therefore not provide discounts until receipt of the Form 486 notification letter from USAC.
http://www.universalservice.org/sl/tools/forms/default.aspx

For SPI method:

Before we can apply discounts on your E-Rate eligible services via the SPI method you must complete, sign and return the AT&T E-Rate SPI grid. You must list and assign the applicable FRN to each Billed Account Number, as well as provide the percentage of eligibility based on services and use of Billed Account Number. Each FRN must have a designated Billing Account Number in order for AT&T to properly calculate your discounts.

For BEAR method:

Please complete and return the section of the certification for BEAR requests. Failure to return the certification form indicating BEAR method with a designated payment address will result in the BEAR reimbursement payment mailed to the address listed on the Form 472 (BEAR) Notification Letter.

The designated payment address provided on the certification form **MUST match** the address from one of the following forms:

- Funding Commitment Decision Letter (FCDL)
- 486 Notification Letter
- Form 472 (BEAR) Notification Letter.

BEAR reimbursement payments will not be mailed to an address not listed on the above forms.

If you elect to submit a BEAR Form 472, we remind you that the SLD provides guidance to applicants to allow time for their Service Provider to process submitted BEAR forms. AT&T requires 5 business days for processing whether submitted online or by paper.

The SLD provides the ability to process your BEAR online which offers the following advantages:

* System checks for errors and notifies you of missing or inconsistent data.

* Invoice review process can begin soon after all required information is submitted online

* Receive by email a copy of the Service Provider notification of your BEAR filing

AT&T allows for use of the online BEAR system provided by USAC.

E-Rate Eligibility:

The eligibility or ineligibility of products or services for E-Rate funding is solely determined by the USAC/SLD and/or the FCC. AT&T makes no representations or warranties regarding such eligibility.

AT&T reminds our customers who are purchasing from State Contracts or other Master Buying Agreements negotiated by a third party to review and understand the terms and conditions required under that contract, including any administrative fees the contract may impose, which may be considered ineligible by USAC.

AT&T reminds our customers to deduct all ineligible charges from their BEAR Form 472 submissions.

The attached Certification Page identifies the two options described above and requires you to indicate your preference.

If you have any questions or concerns please feel free to contact the AT&T National E-Rate Service Center at 1-877-444-6944 between 8:00 AM and 7:00 PM E.S.T Monday through Friday.

AT&T looks forward to serving your telecommunications needs and providing you with World Class Service today and in the future.

Sincerely,
Customer Advocate, AT&T National E-Rate Center of Excellence
1-877-444-6944
AT&T E-Rate Home page: http://www.att.com/erate
SLD Home page: http://www.sl.universalservice.org

The following documents are attached:

Instructions
Existing Service List (Grid)
SPI/BEAR Certification Page
Growth Page

**This e-mail and any files transmitted with it are the property of AT&T, are confidential, and are intended solely for the use of the individual or entity to whom this e-mail is addressed. If you are not one of the named recipients or otherwise have reason to believe that you have received this message in error, please notify the sender at 1-877-444-6944 between 8:00 AM and 7:00 PM EST and delete this message immediately from your computer. Any other use, retention, dissemination, forwarding, printing, or copying of this e-mail is strictly prohibited.

Instructions for E-Rate Funding Year 2013

The Ohio Bell Telephone Company dba AT&T Ohio SPIN: 143001688

Below you will find instructions for completing the three attachments required by AT&T Ohio in regards to E-Rate Funding Year 2013.
Attachments: **Existing Services List, Growth Page, and SPI/BEAR Certification Page**

Existing Service List –Also Known as Grid- **Required if the SPI Discount Method is selected.**

	Header	The header information is populated for you and includes: Funding Year and Dates, Service Provider Name and SPIN, Applicant Name and Billed Entity Number. **Please do not modify header information.**
A	**Existing Service List (Grid)**	Read the purpose of the Existing Service List (Grid).
B	**Voicemail Product**	Read and understand the following, as noted in our letter to you in February of 2013. If AT&T Messaging voicemail products were sought on your 470/471 and approved please be advised that those services are no longer provided by Ohio Bell Telephone Company dba AT&T Ohio SPIN 143001688. Voicemail products and services are provided by AT&T Messaging, SPIN 143033845. AT&T Messaging voicemail products are administered by AT&T Messaging SPIN 143033845. If you have a funded FRN for SPIN: **143001688** that includes Voicemail, please contact USAC and inquire if the funding associated with any Voicemail charges, can be moved to a stand alone FRN through a SPIN change, FRN SPLIT.
	Information requested	**Content required**
1.)	Billing Telephone Number	Contains the Billed Telephone Number (BTN) as identified in our database for the above referenced SPIN, and/or a previous Existing Service List returned by you. a) **Add** additional eligible Billed Telephone Numbers for which you requested and received funding that are not included on the attached list. The format for the BTN must be 13 numeric or alphanumeric characters, which includes the 3 digit customer code. (no spaces, dashes or other characters) For example: **55R7771111222** b) **Remove** ALL Billed Telephone Numbers that are not eligible to receive E-rate benefits.
2.)	Working Telephone # or Circuit ID	Contains the working telephone number (WTN) or Circuit ID as identified in our database for the above referenced SPIN, and/or a previous Existing Service List returned by you. a) **Add** additional eligible Working Telephone # or Circuit ID for which you requested and received funding that are not included on the attached list. The format for the WTN must be 10 digits (no spaces, dashes or other characters) For example: **5557771111.** The format of the circuits ID may contain up to 45 Alphanumeric characters (hyphens and period symbols are permitted, no spaces) For example: **XXXX.000000..XX** b) **Remove** ALL Working Telephone # or Circuit ID that are not eligible to receive E-rate benefits.
3.)	FRN	Enter the **FRN** associated with each BTN/ WTN or Circuit ID listed in 1,2. The FRN(s) MUST correspond to the funding requested on your 471, Block 5, Item 21 attachment.
4.)	Percent at which product is Eligible	Percent at which product is Eligible: Enter the **Percentage** for which the line is qualified to receive discounts under the **program** rules. If this service is only partially eligible, as defined by the SLD, or shared with an ineligible entity, please enter the percentage of eligible use (1-99). **Caution!** This percentage is not the same as the FRN discount eligibility percentage on your FCDL by the SLD. For more information call the SLD at (888) 203-8100 or visit the

		SLD website at http://www.sl.universalservice.org.
5.)	Class of Service	Not a required field. You can use this field to identify the class of service associated to the BTN/WTN or Circuit ID provided.
6.)	Notes	Use this field to respond to questions addressed by the National E-Rate Center of Excellence.

Circumstances requiring Special Handling

A. **MULTIPLE FRN's / DIFFERENT 486 START DATES:** If you have a Billing Telephone Number and/or Working Telephone Numbers that will be assigned to MULTIPLE FRN's for the 2013 funding year covering separate 486 Services Start Date and End Date you must create a duplicate entry of the BTN & WTN for each FRN funded. **See Example Below Line 1 & 2:** The Billing Telephone Number and Working Telephone Number were entered multiple times assigned to FRN 9876543 which was approved with start date of 7-1 thru 12-31 and the FRN 3456789 with start date 1-1 thru 6-30.

1.) Billed Telephone Number	2.) Working Telephone Number	3.) FRN	4.) Percent at which product is Eligible
555777221122	555777221	9876543	100
555777221122	555777221	3456789	100

B. **USAGE ONLY:** If you have an FRN that is specifically for **USAGE** (Calls) that is different than the FRN intended for the products and services, please indicate this on the SPI/BEAR certification page in the Usage Only column and contact us for **SPECIAL Handling @ 1-877-444-6944.**

Growth-Additional Services Page -Required if the SPI Discount Method is selected and you received funding on products and services which you plan to have installed after returning the Existing Service List to the National E-Rate Center of Excellence. This form should also be used to identify accounts where you have received E-Rate funding on Non-Recurring charges related to the installation of products and services. You MUST contact the National E-Rate Center of Excellence @ 1-877-444-6944 and or submit a Growth Form after installation with the Billing & Working Telephone Numbers and corresponding FRN if the discount method is selected and you are expecting discounts on new services or non-recurring charges.

SPI/BEAR CERTIFICATION: Required if the SPI or BEAR discount method is selected. In this section you are being asked to identify how you would like to receive your E-rate Funding. Place a X in the BEAR or SPI fields. Note: If you submit a BEAR 472 Form to AT&T prior to returning this certification. The BEAR 472 form will be used as your certification.

By SPI method which is the discounted billing method. Note: Discounts will not begin until GRID is returned and a 486 Notification Letter is received.

By BEAR method if you would like your approved E-rate Funding to be provided via the BEAR reimbursement method. If this box is selected, please complete Section 11 and return to the E-rate center. List all FRNs for this SPIN for which you select the BEAR method of disbursement.

Once you have declared your preference, your E-rate Funding will be treated in this manner for the entire Funding Year once discounts begin.

	Information requested	Content required
1	**Applicant Name**	Enter the Applicant Name as is appears on your form 470

2	**Contact Name**	Enter the contact person in which AT&T should interact with to discuss questions related to your discounts.
3	**Contact Title**	Enter the title of the contact person.
4	**Contact Phone #**	Enter the phone number of the contact person.
5	**Contact Email Address**	Enter the email address of the contact person.
6	**Disbursement Method**	Please provide all of the requested information for all FRN's listed on your returned Existing Services List.
7	**Certification**	Read and understand certifications re: FRN and Eligibility designations
8	**Authorized Contact Signature**	Signature of Authorized Contact
9	**Authorized Contact Title**	Title of Authorized Contact
10	**Date**	Date Signed
11	**Designated Payment Address (BEAR ONLY)**	Failure to return the certification form indicating BEAR method with a designated payment address will result in the BEAR reimbursement payment mailed to the address listed on the Form 472 (BEAR) Notification Letter. The designated payment address provided on the certification form MUST match the address from one of the following forms; • Funding Commitment Decision Letter (FCDL) • 486 Notification Letter • Form 472 (BEAR) Notification Letter. **BEAR reimbursement payments will not be mailed to an address not listed on the above forms**

Please return the completed forms as follows
Existing Service List: return the completed form in Excel format via email to snowerock@att.com
Growth Page: return the completed form in Excel format via email to snowerock@att.com

SPI/BEAR Certification Page: return the signed and completed form in PDF format via fax to 1-888-308-7186.

via Email (Preferred Method): snowerock@att.com
via US Mail:
AT&T National E-Rate Center of Excellence Spin 143001688
444 Michigan Av. Flr 2
Detroit , MI 48226
via FAX: 1-888-308-7186

If you would like on-line assistance in completing this information please contact the National E-Rate Center of Excellence at 1-877-444-6944.
Thank you for choosing **AT&T Ohio** as your E-Rate provider.

E-Rate Year 2013 (YR 16)
(07/01/2013 through 06/30/2014)

Service Provider Selected:The Ohio Bell Telephone Company dba AT&T Ohio SPIN:143001688

COUNT :

Applicant Name: **Billed Entity Number:**

A. This Existing Services List is the Applicants representation to AT&T Ohio regarding the Billed Telephone Numbers, FRNs and Eligibility percentages of the services listed below. AT&T Ohio will rely upon these representations in the calculation of discounts. The Applicant is solely responsible for the accuracy of this information. Please return this completed form with the "signed" certification page.			B. If AT&T messaging voicemail products were sought on your 470/471 and approved, please be advised that those services are no longer provided by Ohio Bell Telephone Company dba AT&T Ohio SPIN: 143001688, and no discounts will be provided under this SPIN. Voicemail products and services are provided by AT&T Messaging, SPIN 143033845. See Instructions for more information.		
1.) Billed Telephone Number	2.) Working Telephone Number or Circuit ID	3.) FRN	4.) Percent at which product is Eligible	5.) Class of Service	6.) Notes

E-rate Year 2013 (YR 16)
(July 1, 2013 through June 30, 2014)

Service Provider: ***The Ohio Bell Telephone Company dba AT&T Ohio***

SPIN: 143001688

1. Applicant Name:	
2. Contact Name:	
3. Contact Title:	
4. Contact Number:	
5. Contact Email:	

Funding Information

6. Please provide all of the requested information for all FRN's listed on your returned Existing Services List for SPIN 143001688.

Place an X to select Method

FRN(s)	FRN %	Pre-Discount Amount	Committed Amount	SPI (Discount)	BEAR	Usage Only FRN (Enter Yes if applicable)

7. I certify that I have reviewed the information provided by AT&T Ohio on the Existing Service List and have added ALL Services that are eligible for E-Rate, as well as removed ALL Services that are not eligible. The FRN's and Eligibility percentages assigned to each Service is true and correct, and properly reflects our request for authorization of funding designated on our Form(s) 471 submission to the Schools and Libraries Division for Funding Year 2013 (YR16). I further understand that we are responsible for contacting AT&T to notify them of any qualified services installed after the funding year to obtain discounts on those services.

8. Signature:

9. Title: **10. Date:**

11. Designated Payment Address (BEAR ONLY)	**Street Address:** **City:** **State:** **Zip:** Failure to return the certification form indicating BEAR method with a designated payment address will result in the BEAR reimbursement payment mailed to the address listed on the Form 472 (BEAR) Notification Letter. The designated payment address provided on the certification form MUST match the address from one of the following forms; • Funding Commitment Decision Letter (FCDL), • 486 Notification Letter, • Form 472 (BEAR) Notification Letter. BEAR reimbursement payments will not be mailed to an address not listed on the above forms.

Please send this signed and completed form to:

(U.S. Mail) **AT&T National *E-Rate Center of Excellence Spin 143001688***
444 Michigan Av. Flr 2
Detroit , MI **48226**

FAX: ***1-888-308-7186***

If you would like on-line assistance in completing this form or your Service List please contact us and our representatives will gladly answer any questions you may have, and facilitate the timely completion of this step in the discounting process.