

Before the
Federal Communications Commission
Washington, D.C. 20554

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

Petition for Reconsideration or Clarification of the West Virginia Department of Education
Regarding
Report and Order Released on July 23, 2014; FCC Order 14-99

Pursuant to section 1.429 of the rules of the Federal Communications Commission (FCC)¹, the West Virginia Department of Education seeks clarification, or to the extent necessary, reconsideration of three issues arising from FCC Order 14-99, the Report and Order released on July 23, 2014 (“E-rate Reform Order”)².

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¹ 47 C.F.R. § 1.429.

² Modernizing the E-rate Program for Schools and Libraries, Report and Order, and Further Notice of Proposed Rulemaking, FCC 14-99 (rel. July 23, 2014) (Order).

I. Introduction

In the past few weeks, the West Virginia Department of Education has consulted with school districts during the process of educating them regarding the changes in E-rate 2.0 and the July E-rate Order. This filing represents not only concerns from the districts, but also the West Virginia Department of Education (WVDE). As one of only two states that currently file Priority/Category 2 Internal Connections at the consortia level, we believe we have a unique perspective on concerns regarding these services. Additionally, the State E-rate Coordinator monitors and assists districts in their applications, as well as, filing state applications as a consortia lead. The resulting issues are a culmination of concerns from each of these areas. Additional information or source documents are available to the FCC, upon request.

II. Predictability in Category 2 Funding for Internal Connections Equipment and Services

E-rate applicants in West Virginia are still left reeling at the added levels of complexity that have been included as part of Category 2 Internal Connections. As part of that frustration, they have long been left without any predictability in regards to Priority 2/Category 2 funding. As a result, they have a negative opinion of Category 2 and its promise to afford their classrooms Wi-Fi. To further emblazon this apprehension, a recent Funds for Learning report³ has them convinced that unless they sit in an 85% district or consortia average, they have little to no hope of seeing any funding, yet a third year in a row.

These concerns could be easily addressed by permitting processing of applications that are workable and, once review is finalized, all “approvable” applications enter into a stage of “As Yet Unfunded-but Approved.” This would permit a “promise” that applicants could use to move forward with projects at

³ Balancing the E-rate Budget. Ta’Chelle Jones. Sept 3, 2014.
<https://www.fundsforlearning.com/blog/2014/09/balancing-the-e-rate-budget>

100% of the cost. In subsequent funding years, when funding is again available, those applications and their discount percentages/NSLP (National School Lunch Program) percentages (for pro-ration purposes) could then be considered for funding. A simple outreach process could allow schools to release the funding if they no longer intend on using those services.

Schools/Districts would only qualify for this process if they would be completing the project prior to the next application window. We believe this would both allow schools to have the technology they need in a timely manner, as well as, eliminate the need for multiple applications by applicants, many who pay a consultant to file each application. It would also streamline the time spent by PIA (Program Integrity Assurance) reviewers in reviewing the exact same requests for funding year after year and permit schools and districts the ability to have some predictability added to Category 2. The approved application would allow them the security of a future funding commitment that would permit them to secure financial assistance to cover the funding until such date as it is able to be released by the FCC/USAC. These “As Yet Unfunded—but Approved” applications should be considered prior to new applications in subsequent funding years in order to timely fund applicants in the closest time period available, with the caveat that there would not be a date identified in which that funding would be realized.

III. Voice Services That Are Subject To Phase-Out in Funding Year 2015

The listing of services that the FCC has determined will be phased out of voice support as a flash cut in 2015 has also been a great concern of applicants in West Virginia. See the attached local phone bill in Appendix A that exhibits the level of detail that schools/districts will be forced to wade through to find

and break out a variety of relatively small charges that are often buried deep within what can be complex telephone bills to include:

- Directory assistance charges
- Text Messaging
- Custom Calling services
- Direct Inward Dialing
- 900/976 Call blocking
- Inside wire maintenance

While the Appendix is a very small school district with three schools and one board office, imagine having to push through that times 85 if you are Kanawha County Schools! This district has had to hire someone on contract for the sole purpose of preparing their existing bills for E-rate. With the additional burden of sifting through confusing bills, in a foreign language, the FCC's goal to simplify and streamline the program is anything but. The amount of administrative time that USAC's PIA reviewers may need to expend to verify the exclusion of these charges will outweigh savings to the fund. While we have come to terms with the flash cut of paging, web-hosting and e-mail, the removal from eligibility of portions of the voice telephone bill adds another difficulty that has applicants ready to implode from all of the complexities that have been added to an already difficult program.

While we are cognizant of the importance of high-speed broadband, we are also sensitive to the applicants who are attempting to dig through mounds of phone bills in order to ensure that these services aren't included in requests, as well as, invoicing for reimbursement...an already laborious task that well exceeds the hours on the OMB Form 472 in order to determine amounts. The WVDE recommends that such components be treated as a part of normal voice services, and whose eligibility are phased out on the same schedule as voice phone services.

IV. The E-rate Urban Definition Should Include Only Urban Areas and Not Urban Clusters.

Based on the July 23rd E-rate Reform Order, the FCC adopted the 2010 U.S. Census urban definition that states:

“For the 2010 Census, the Census Bureau defined urban areas as the densely settled core of census tracts or blocks that met minimum population density requirements (50,000 people or more), along with adjacent territories of at least 2,500 people that link to the densely settled core.”⁴

Further, the order states ““The Administrator shall designate a school or library as ‘urban’ if the school or library is located in an urbanized area as determined by the most recent rural-urban classification by the Bureau of the Census.” It is the opinion of the WVDE that solely urbanized areas should be considered. The addition of urban clusters unsuitably includes locations that are far from urban.

Additionally, fringe cities are included in clusters listing, despite the fact that they are under the 2,500 population.⁵ One WV example is Petersburg with a population of 2,467. Due to this change, the county will be considered Urban for the first time in E-rate history since six of the eight entities in Grant County, many non-instructional facilities, reside in Petersburg. This means that if their district population’s NSLP needy percentage drops below 50.00%, they will become a 60% district rather than a 70% district.

Census errors aside, there are plenty of West Virginia examples where the districts will now be considered, for the first time ever, Urban districts. Many will face a funding loss, in an already budget-

⁴ Modernizing the E-rate Program for Schools and Libraries, Report and Order, and Further Notice of Proposed Rulemaking, FCC 14-99 (rel. July 23, 2014) (Order). ¶ 223.

⁵ 76 Fed. Reg. 53030-1, 53043.

tight time, not only due to voice phase-down, but also due to this unnecessary shift. Statewide, due to the urbanized/urban cluster changes, West Virginia will go from 36.26% urban to 68.42%.⁶ Anyone that has visited West Virginia would have to pause when looking at those statistics due to the extreme shift we will experience as a result of this adoption. See Appendix B, Case Examples, for County-specific data and information that highlight the concerns of the West Virginia Department of Education on behalf of all schools in West Virginia.

V. Conclusion

While the items addressed in this filing are few, the concerns of applicants in West Virginia are many. Hopes for streamlining and simplification have not met the expectations of applicants, and they are left feeling as if the program has now become more complicated as a result of the most recent Report and Order. We ask that you consider the recommended simplifications and changes in order to more directly align the E-rate program on a path of simplification.

Respectfully submitted,

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Dated: September 18, 2014

⁶ Bureau of the Census, 2010 Census Urban Area FAQs, <http://www.census.gov/geo/reference/ua/uafaq.html> (last accessed September 18, 2014).

Appendix A

Sample School District Telephone Bills

The attached sample is from a small school district in WV that is comprised of three school sites and one board office. These bills are representative of their monthly billing documentation that would have to be combed pre-E-rate request, as well as, during reimbursement to ensure that cost-allocations are completed appropriately to follow new rules restricting E-rate eligibility of:

- Directory assistance charges
- Text Messaging
- Custom Calling services
- Direct Inward Dialing
- 900/976 Call blocking
- Inside wire maintenance

CURRENT BILLING SUMMARY

Local Service from 02/22/11 to 03/21/11

Qty Description	Charge
Basic Charges	
Small Business Advantage Basic Bundle with 900 LD	104.99
Advantage Access Line 2Year Ter Deluxe VM	
Advantage Feature Pack FA 900 LD Free	
9 Additional Line	220.50
11 Multi-Line Federal Subscriber Line Charge	101.20
11 WV County E911 Charge	26.95
11 WV Telecomm Relay Svc Sur	.55
Other Charges-Detailed Below	.50
Federal USF Recovery Charge	15.73
Long Distance - Federal USF Surcharge	5.50
Total Basic Charges	475.92
Optional Services	
3 Additional Listing Business	4.65
6 Non-Published Listing	9.30
6 Non Published Listing No Chg Class-Caller Name & Num Bus	9.30CR
Enh Call Wait W/ Cancel-B	9.99
Feature5 Pack	5.13
Local Directory Assistance Cr	11.95
-Detailed Below	3.00CR
Other Charges-Detailed Below	3.00
Long Distance - Federal USF Surcharge	47.41
Total Optional Services	7.37
Toll/Other	
-Detailed Below	48.23
-Detailed Below	13.22
Long Distance - Federal USF Surcharge	.87
Total Toll/Other	62.32
TOTAL	624.74

MEASURED CALL DETAIL for

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	844	1273	.00
Dial Evening			.00
Dial Night	191	201	.00
		Less Allowance for 31 Days	.00
Subtotal			.00

MEASURED CALL DETAIL for

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	459	732	.00
Dial Evening			.00
Dial Night	39	85	.00
		Less Allowance for 31 Days	.00
Subtotal			.00

MEASURED CALL DETAIL for

PREMIUM FLAT LMS

CUSTOMER TALK

If your bill shows a Previous amount, Current Charges remain due by the Date Due shown. All of your bill charges must be paid each month to keep your account current and avoid collection activities, including a notice of possible disconnection of service. To avoid disconnection of local service, the Previous Basic Charges should be paid immediately.

Description	Current	Previous
* Basic Charges	\$386.98	\$0.00
Additional Line	\$220.50	\$0.00
Advantag	\$49.00	\$0.00
Multi-Line Federal	\$116.93	\$0.00
WV Telecomm Rel	\$0.55	\$0.00
Directory/Non-Reg	\$4.65	\$0.00
Optional Services	\$129.80	\$0.00
Toll/Other	\$103.31	\$0.00
Total	\$624.74	\$0.00

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	8	2	.00
Dial Evening			.00
Dial Night			.00
	Less Allowance for 31 Days		.00

Subtotal .00

MEASURED CALL DETAIL for [REDACTED]

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	2	1	.00
Dial Evening			.00
Dial Night			.00
	Less Allowance for 31 Days		.00

Subtotal .00

MEASURED CALL DETAIL for [REDACTED]

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	33	6	.00
Dial Evening			.00
Dial Night	12	1	.00
	Less Allowance for 31 Days		.00

Subtotal .00

MEASURED CALL DETAIL for [REDACTED]

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	7	9	.00
Dial Evening			.00
Dial Night	1	2	.00
	Less Allowance for 31 Days		.00

Subtotal .00

MEASURED CALL DETAIL for [REDACTED]

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	140	226	.00
Dial Evening			.00
Dial Night	13	14	.00
	Less Allowance for 31 Days		.00

Subtotal .00

MEASURED CALL DETAIL for [REDACTED]

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	39	183	.00
Dial Evening			.00
Dial Night	9	30	.00
	Less Allowance for 31 Days		.00

Subtotal .00

**** ACCOUNT ACTIVITY ****

Qty	Description	Order Number	Effective Dates	
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
1	Carrier Cost Recovery Surcharge	AUTOCH	2/20	.50
		Subtotal		4.81
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
1	Multi-Line Business Federal Pre-Subscribed Line Charge			
		AUTOCH	2/20	4.31
		Subtotal		4.31
		Subtotal		47.91

Fax

Detail of [REDACTED] Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
1	FEB 01	9:32A	1	OD	LOCAL D.A. WV (304)411-0000	.50
2	FEB 01	8:34P	1	OE	LOCAL D.A. WV (304)411-0000	.50
3	FEB 09	12:20P	1	OD	LOCAL D.A. WV (304)411-0000	.50
4	FEB 10	4:10P	1	OD	LOCAL D.A. WV (304)411-0000	.50
					Subtotal	2.00

Detail of [REDACTED] Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
5	JAN 25	9:28A	1	OD	LOCAL D.A. WV (304)411-0000	.50
					Subtotal	.50

Detail of [REDACTED] Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
6	FEB 04	7:48A	1	ON	LOCAL D.A. WV (304)411-0000	.50
					Subtotal	.50

Detail of Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
7	JAN 24	12:04P	.5	DD	RIPLEY WV	.00 Q
8	JAN 24	12:05P	.5	DD	RIPLEY WV	.00 Q
9	JAN 24	12:12P	.5	DD	RIPLEY WV	.00 Q
10	JAN 24	1:30P	7.1	DD	CHARLESTON WV	.00 Q
11	JAN 24	3:35P	8.6	DD	CHARLESTON WV	.00 Q
12	JAN 24	3:59P	.5	DD	WESTON WV	.00 Q
13	JAN 24	4:17P	5.7	DD	WESTON WV	.00 Q
14	JAN 25	8:35A	.5	DD	RIPLEY WV	.00 Q
15	JAN 25	9:35A	.8	DD	NASHVILLE TN	.00 Q
16	JAN 25	10:19A	4.8	DD	CLARKSBURG WV	.00 Q
17	JAN 25	10:49A	1.1	DD	PARKERSBG WV	.00 Q
18	JAN 25	11:25A	7.0	DD	PARKERSBG WV	.00 Q
19	JAN 25	12:49P	.5	DD	CHARLESTON WV	.00 Q
20	JAN 25	12:51P	.5	DD	PARKERSBG WV	.00 Q
21	JAN 25	2:34P	.5	DD	MT VERNON OH	.00 Q
22	JAN 25	2:35P	.5	DD	RIPLEY WV	.00 Q
23	JAN 25	3:34P	9.2	DD	PARKERSBG WV	.00 Q
24	JAN 25	4:10P	.5	DD	RIPLEY WV	.00 Q
25	JAN 26	6:57A	.8	DD	GASSAWAY WV	.00 Q
26	JAN 26	8:53A	.5	DD	PARKERSBG WV	.00 Q
27	JAN 26	10:04A	1.3	DD	PARKERSBG WV	.00 Q
28	JAN 26	2:16P	24.0	DD	PARKERSBG WV	.00 Q
29	JAN 26	2:54P	2.6	DD	PARKERSBG WV	.00 Q
30	JAN 26	3:45P	.5	DD	CANTON OH	.00 Q
31	JAN 26	3:46P	.6	DD	CANTON OH	.00 Q
32	JAN 27	7:07P	.5	DD	BUCKHANNON WV	.00 Q
33	JAN 28	8:31A	2.3	DD	MINERLWLLS WV	.00 Q
34	JAN 28	8:48A	.8	DD	CHARLESTON WV	.00 Q
35	JAN 28	8:52A	7.4	DD	IVYDALE WV	.00 Q
36	JAN 28	9:40A	8.1	DD	PRKRSBGZN1 WV	.00 Q
37	JAN 28	9:50A	8.3	DD	CHARLESTON WV	.00 Q
38	JAN 28	10:20A	12.3	DD	PRKRSBGZN1 WV	.00 Q
39	JAN 29	12:00P	.5	DD	PARKERSBG WV	.00 Q
40	JAN 31	9:28A	.9	DD	PARKERSBG WV	.00 Q
41	JAN 31	9:43A	.6	DD	PARKERSBG WV	.00 Q
42	JAN 31	10:37A	.5	DD	PARKERSBG WV	.00 Q
43	JAN 31	10:37A	.8	DD	PARKERSBG WV	.00 Q
44	JAN 31	11:33A	1.4	DD	ST ALBANS WV	.00 Q
45	JAN 31	11:36A	.5	DD	PARKERSBG WV	.00 Q
46	JAN 31	11:48A	2.1	DD	CHARLESTON WV	.00 Q
47	JAN 31	12:03P	.5	DD	PARKERSBG WV	.00 Q
48	JAN 31	12:29P	.5	DD	ST MARYS WV	.00 Q
49	JAN 31	12:32P	.7	DD	PARKERSBG WV	.00 Q
50	JAN 31	12:34P	.7	DD	PARKERSBG WV	.00 Q
51	JAN 31	1:19P	.8	DD	GASSAWAY WV	.00 Q
52	JAN 31	1:23P	22.4	DD	PARKERSBG WV	.00 Q
53	JAN 31	2:26P	.7	DD	RIPLEY WV	.00 Q
54	JAN 31	2:48P	.6	DD	SUMMERSVL WV	.00 Q
55	JAN 31	3:20P	.5	DD	RIPLEY WV	.00 Q
56	JAN 31	3:52P	.7	DD	CHARLESTON WV	.00 Q
57	JAN 31	4:02P	.5	DD	RIPLEY WV	.00 Q
58	JAN 31	4:13P	4.6	DD	HURRICANE WV	.00 Q
59	JAN 31	6:13P	.5	DD	CLARKSBURG WV	.00 Q
60	JAN 31	6:14P	.5	DD	WEST UNION WV	.00 Q
61	JAN 31	6:15P	.9	DD	CLARKSBURG WV	.00 Q
62	JAN 31	6:47P	.5	DD	CLARKSBURG WV	.00 Q
63	JAN 31	6:48P	.5	DD	WEST UNION WV	.00 Q
64	FEB 01	9:11A	1.4	DD	PARKERSBG WV	.00 Q
65	FEB 01	9:15A	2.9	DD	PARKERSBG WV	.00 Q
66	FEB 01	9:52A	7.9	DD	CHARLESTON WV	.00 Q
67	FEB 01	10:01A	1.2	DD	BLUEFIELD WV	.00 Q
68	FEB 01	10:03A	.5	DD	RIPLEY WV	.00 Q
69	FEB 01	10:18A	8.0	DD	CHARLESTON WV	.00 Q
70	FEB 01	10:49A	.7	DD	PRKRSBGZN1 WV	.00 Q
71	FEB 01	10:50A	.5	DD	SUTTON WV	.00 Q
72	FEB 01	10:50A	4.3	DD	SUTTON WV	.00 Q
73	FEB 01	10:58A	1.5	DD	RIPLEY WV	.00 Q
74	FEB 01	11:27A	.5	DD	RIPLEY WV	.00 Q
75	FEB 01	11:43A	10.7	DD	PARKERSBG WV	.00 Q
76	FEB 01	12:17P	.9	DD	PRKRSBGZN1 WV	.00 Q

CURRENT BILLING SUMMARY

Local Service from 02/22/11 to 03/21/11

Qty Description	Charge
Basic Charges	
Bus 1-Party Basic Calling Plan	24.50
Multi-Line Federal Subscriber Line Charge	9.20
WV [REDACTED] County E911 Charge	2.45
WV Telecomm Relay Svc Sur	.05
Local Measured Service	.07
Federal USF Recovery Charge	1.43
Total Basic Charges	37.70
Toll/Other	
[REDACTED] -Detailed Below	14.95
Total Toll/Other	14.95

TOTAL 52.65

MEASURED CALL DETAIL for [REDACTED]

BASIC LOCAL LMS - WV

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	1	1	.07
Dial Evening			.00
Dial Night			.00
	Less Allowance for 31 Days		.00

Subtotal .07

Detail of ESBI Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
1	FEB 02				[REDACTED] VMAIL MO FEE	14.95

Billed on Behalf of [REDACTED]

Subtotal 14.95

TOLL CHARGE INQUIRIES [REDACTED]

Legend Call Types:

CUSTOMER TALK

If your bill shows a Previous amount, Current Charges remain due by the Date Due shown. All of your bill charges must be paid each month to keep your account current and avoid collection activities, including a notice of possible disconnection of service. To avoid disconnection of local service, the Previous Basic Charges should be paid immediately.

Description	Current	Previous
* Basic Charges	\$35.25	\$0.00
Local Measured S	\$0.07	\$0.00
Bus 1-Party Basic	\$24.50	\$0.00
Multi-Line Federal	\$10.63	\$0.00
WV Telecomm Rel	\$0.05	\$0.00
Optional Services	\$2.45	\$0.00
Toll/Other	\$14.95	\$0.00
Total	\$52.65	\$0.00

CURRENT BILLING SUMMARY

Local Service from 02/22/11 to 03/21/11

Qty Description	Charge
Basic Charges	
Business Advantage Basic Bundle	
with 300 LD	84.99
Advantage Access Line 2Year Ter	
Deluxe VM	
Advantage Feature Pack	
FA 300 LD Free	
2 Multi-Line Federal Subscriber Line Charge	18.40
2 WV County E911 Charge	4.90
2 WV Telecomm Relay Svc Sur	.10
Other Charges-Detailed Below	.50
Federal USF Recovery Charge	2.86
Long Distance - Federal USF Surcharge	2.40
Total Basic Charges	114.15
Optional Services	
Additional Listing Business	1.55
Non-Published Listing	1.55
Non Published Listing No Chg	1.55CR
Class-Caller Name & Num Bus	9.99
Dir Adv-	6.25
Insd Wr Mnt Bus Sv/Mr W/Mo C	4.99
Local Directory Assistance Cr	1.00CR
-Detailed Below	1.00
Other Charges-Detailed Below	9.48
Long Distance - Federal USF Surcharge	1.34
Total Optional Services	33.60

TOTAL 147.75

MEASURED CALL DETAIL for

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	288	311	.00
Dial Evening			.00
Dial Night	56	67	.00
	Less Allowance for 31 Days		.00
Subtotal			.00

MEASURED CALL DETAIL for

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	230	263	.00
Dial Evening			.00
Dial Night	31	33	.00
	Less Allowance for 31 Days		.00
Subtotal			.00

**** ACCOUNT ACTIVITY ****

Qty Description	Order Number	Effective Dates	Charge
1 Call Return-Usage Basis		2/22	.86
1 Multi-Line Business Federal Pre-Subscribed Line Charge			
	AUTOCH	2/20	4.31
1 Carrier Cost Recovery Surcharge		AUTOCH 2/20	.50
	Subtotal		5.67
1 Multi-Line Business Federal Pre-Subscribed Line Charge			
	AUTOCH	2/20	4.31
	Subtotal		4.31
Subtotal			9.98

CUSTOMER TALK

If your bill shows a Previous amount, Current Charges remain due by the Date Due shown. All of your bill charges must be paid each month to keep your account current and avoid collection activities, including a notice of possible disconnection of service. To avoid disconnection of local service, the Previous Basic Charges should be paid immediately.

Description	Current	Previous
* Basic Charges	\$70.36	\$0.00
Advantag	\$49.00	\$0.00
Multi-Line Federal	\$21.26	\$0.00
WV Telecomm Rel	\$0.10	\$0.00
Directory/Non-Reg	\$12.79	\$0.00
Optional Services	\$46.71	\$0.00
Toll/Other	\$17.89	\$0.00
Total	\$147.75	\$0.00

DETAIL OF USAGE SENSITIVE CHARGES

Call Return-Usage Basis 1 activation .86 per activation .86
 Max Charge: 7.50

.86

Detail of [REDACTED] Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
1	JAN 31	9:25A	1	OD	LOCAL D.A. WV (304)411-0000	.50
Subtotal						.50

Detail of Frontier Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
2	FEB 17	10:02A	1	OD	LOCAL D.A. WV (304)411-0000	.50
Subtotal						.50

Detail of [REDACTED] Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
3	JAN 25	8:18A	.5	DD	CHARLESTON WV	.00 Q
4	JAN 25	9:34A	3.0	DD	PARKERSBG WV	.00 Q
5	JAN 31	8:34A	.7	DD	RIPLEY WV	.00 Q
6	JAN 31	10:10A	.6	DD	RIPLEY WV	.00 Q
7	JAN 31	1:02P	.5	DD	PARKERSBG WV	.00 Q
8	JAN 31	3:06P	.5	DD	PARKERSBG WV	.00 Q
9	JAN 31	3:12P	.9	DD	PARKERSBG WV	.00 Q
10	FEB 01	4:26P	.5	DD	PARKERSBG WV	.00 Q
11	FEB 01	7:52P	.5	DD	WESTON WV	.00 Q
12	FEB 01	7:53P	.5	DD	CHARLESTON WV	.00 Q
13	FEB 02	10:45A	.5	DD	RIPLEY WV	.00 Q
14	FEB 02	1:12P	.5	DD	CHARLESTON WV	.00 Q
15	FEB 03	2:07P	.6	DD	CHARLESTON WV	.00 Q
16	FEB 04	8:30A	.5	DD	RIPLEY WV	.00 Q
17	FEB 04	8:41A	.5	DD	RIPLEY WV	.00 Q
18	FEB 04	9:52A	.5	DD	RIPLEY WV	.00 Q
19	FEB 04	2:48P	.6	DD	RIPLEY WV	.00 Q
20	FEB 04	3:25P	2.5	DD	CHARLESTON WV	.00 Q
21	FEB 07	10:01A	3.5	DD	ELIZABETH WV	.00 Q
22	FEB 07	12:37P	.5	DD	RIPLEY WV	.00 Q
23	FEB 07	12:56P	.6	DD	RIPLEY WV	.00 Q
24	FEB 08	3:29P	.5	DD	CHARLESTON WV	.00 Q
25	FEB 08	3:44P	.5	DD	RIPLEY WV	.00 Q
26	FEB 09	1:16P	.8	DD	RIPLEY WV	.00 Q
27	FEB 10	11:35A	1.1	DD	RIPLEY WV	.00 Q
28	FEB 10	12:57P	.6	DD	RIPLEY WV	.00 Q
29	FEB 10	12:59P	.5	DD	RIPLEY WV	.00 Q
30	FEB 10	1:17P	.5	DD	RIPLEY WV	.00 Q
31	FEB 10	4:14P	1.6	DD	RIPLEY WV	.00 Q
32	FEB 11	9:22A	.9	DD	RIPLEY WV	.00 Q
33	FEB 11	10:19A	.7	DD	CHARLESTON WV	.00 Q
34	FEB 11	10:22A	.9	DD	CHARLESTON WV	.00 Q
35	FEB 14	12:36P	.9	DD	RIPLEY WV	.00 Q
36	FEB 15	9:29A	.8	DD	PARKERSBG WV	.00 Q
37	FEB 15	11:38A	7.0	DD	CHARLESTON WV	.00 Q
38	FEB 16	9:01A	.5	DD	RIPLEY WV	.00 Q
39	FEB 16	11:46A	.5	DD	RIPLEY WV	.00 Q
40	FEB 16	2:16P	2.0	DD	PARKERSBG WV	.00 Q
41	FEB 16	2:19P	.5	DD	RIPLEY WV	.00 Q
42	FEB 16	4:28P	.5	DD	RIPLEY WV	.00 Q

CURRENT BILLING SUMMARY

Local Service from 02/22/11 to 03/21/11

Qty Description	Charge
Basic Charges	
Small Business Advantage Basic Bundle with 300 LD	84.99
Advantage Access Line 2Year Ter Deluxe VM	
Advantage Feature Pack FA 300 LD Free	
2 Multi-Line Federal Subscriber Line Charge	18.40
2 WV County E911 Charge	4.90
2 WV Telecomm Relay Svc Sur	.10
Other Charges-Detailed Below	.50
Federal USF Recovery Charge	2.86
Long Distance - Federal USF Surcharge	2.40
Total Basic Charges	114.15
Optional Services	
Non-Published Listing	1.55
Non Published Listing No Chg	1.55CR
Class-Caller Name & Num Bus	9.99
Local Directory Assistance Cr	.50CR
-Detailed Below	.50
Other Charges-Detailed Below	8.62
Long Distance - Federal USF Surcharge	1.34
Total Optional Services	19.95
Toll/Other	
-Detailed Below	1.00
Total Toll/Other	1.00

TOTAL 135.10

MEASURED CALL DETAIL for

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	303	448	.00
Dial Evening			.00
Dial Night	48	45	.00
	Less Allowance for 31 Days		.00

Subtotal .00

MEASURED CALL DETAIL for

PREMIUM FLAT LMS

Type of Call	Number of Calls	Additional Minutes	Charge
Dial Day	134	190	.00
Dial Evening			.00
Dial Night	22	28	.00
	Less Allowance for 31 Days		.00

Subtotal .00

**** ACCOUNT ACTIVITY ****

Qty Description	Order Number	Effective Dates	Charge
1 Multi-Line Business Federal Pre-Subscribed Line Charge	AUTOCH	2/20	4.31
1 Carrier Cost Recovery Surcharge	AUTOCH	2/20	.50
		Subtotal	4.81
1 Multi-Line Business Federal Pre-Subscribed Line Charge	AUTOCH	2/20	4.31
		Subtotal	4.31

Subtotal 9.12

CUSTOMER TALK

If your bill shows a Previous amount, Current Charges remain due by the Date Due shown. All of your bill charges must be paid each month to keep your account current and avoid collection activities, including a notice of possible disconnection of service. To avoid disconnection of local service, the Previous Basic Charges should be paid immediately.

Description	Current	Previous
* Basic Charges	\$70.36	\$0.00
Advantag	\$49.00	\$0.00
Multi-Line Federal	\$21.26	\$0.00
WV Telecomm Rel	\$0.10	\$0.00
Optional Services	\$45.85	\$0.00
Toll/Other	\$18.89	\$0.00
Total	\$135.10	\$0.00

Detail of [REDACTED] Charges

Toll charged to [REDACTED]

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
1	FEB 01	12:25P	1	DD	N11 CODE GA (770)411-0000	1.00
2	FEB 01	2:49P	1	OD	LOCAL D.A. WV (304)411-0000	.50
Subtotal						1.50

Detail of [REDACTED] Charges

Toll charged to 304/354-6022

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
3	JAN 24	9:19A	.7	DD	PRKRSBGZN1 WV	.00 Q
4	JAN 24	10:25A	.7	DD	CHARLESTON WV	.00 Q
5	JAN 25	2:09P	.5	DD	PARKERSBG WV	.00 Q
6	JAN 25	2:54P	.6	DD	PARKERSBG WV	.00 Q
7	JAN 31	9:10A	.5	DD	RIPLEY WV	.00 Q
8	FEB 01	8:58A	3.2	DD	TIGARD OR	.00 Q
9	FEB 01	12:27P	.5	DD	BUFORD GA	.00 Q
10	FEB 01	12:52P	.9	DD	WESTON WV	.00 Q
11	FEB 01	2:17P	1.1	DD	BUFORD GA	.00 Q
12	FEB 01	2:41P	1.2	DD	CHARLESTON WV	.00 Q
13	FEB 01	3:30P	.5	DD	WORCESTER MA	.00 Q
14	FEB 03	11:35A	.5	DD	MARIETTA OH	.00 Q
15	FEB 03	11:53A	.5	DD	PARKERSBG WV	.00 Q
16	FEB 03	11:59A	.7	DD	PRKRSBGZN1 WV	.00 Q
17	FEB 03	12:00P	.7	DD	MARIETTA OH	.00 Q
18	FEB 04	11:03A	1.4	DD	PARKERSBG WV	.00 Q
19	FEB 04	2:21P	2.3	DD	RIPLEY WV	.00 Q
20	FEB 06	8:49P	20.4	DD	RIPLEY WV	.00 Q
21	FEB 07	3:16P	1.6	DD	NITRO WV	.00 Q
22	FEB 08	11:23A	.9	DD	IVYDALE WV	.00 Q
23	FEB 08	2:07P	1.6	DD	CHARLESTON WV	.00 Q
24	FEB 09	10:11A	5.8	DD	RIPLEY WV	.00 Q
25	FEB 09	10:39A	.6	DD	PARKERSBG WV	.00 Q
26	FEB 09	10:59A	.5	DD	CHARLESTON WV	.00 Q
27	FEB 09	1:55P	.5	DD	RIPLEY WV	.00 Q
28	FEB 09	3:16P	2.1	DD	RIPLEY WV	.00 Q
29	FEB 10	8:50A	.6	DD	RIPLEY WV	.00 Q
30	FEB 10	10:41A	.5	DD	WESTON WV	.00 Q
31	FEB 10	10:46A	.9	DD	WESTON WV	.00 Q
32	FEB 10	10:59A	.9	DD	WESTON WV	.00 Q
33	FEB 10	3:12P	.5	DD	PARKERSBG WV	.00 Q
34	FEB 11	1:00P	1.5	DD	RAINELLE WV	.00 Q
35	FEB 11	1:18P	.5	DD	RIPLEY WV	.00 Q
36	FEB 11	2:27P	.5	DD	RAINELLE WV	.00 Q
37	FEB 14	12:43P	7.7	DD	MINERLWLLS WV	.00 Q
38	FEB 14	3:50P	.5	DD	PRKRSBGZN1 WV	.00 Q
39	FEB 15	12:49P	.5	DD	PARKERSBG WV	.00 Q
40	FEB 15	12:52P	.5	DD	PARKERSBG WV	.00 Q
41	FEB 15	3:31P	.5	DD	PARKERSBG WV	.00 Q
42	FEB 16	9:19A	2.2	DD	BELPRE OH	.00 Q
43	FEB 16	9:41A	1.8	DD	PARKERSBG WV	.00 Q
44	FEB 16	9:49A	1.1	DD	PARKERSBG WV	.00 Q
45	FEB 16	12:45P	.8	DD	CHARLESTON WV	.00 Q
46	FEB 16	2:40P	1.3	DD	RIPLEY WV	.00 Q
47	FEB 17	10:30A	.5	DD	PARKERSBG WV	.00 Q
48	FEB 17	11:09A	1.0	DD	RIPLEY WV	.00 Q
49	FEB 18	7:53A	1.3	DD	DAYTONABCH FL	.00 Q
50	FEB 18	9:20A	.5	DD	RALEIGH NC	.00 Q
51	FEB 18	1:47P	.5	DD	RIPLEY WV	.00 Q
Subtotal						.00

Appendix B

Urban Cluster Case Examples

To provide the FCC an idea of why the WVDE is concerned about areas that are now considered Urban, under the new Urban Clusters designation, we are providing a series of case examples:

St. Marys, Pleasants County, West Virginia

As of the census of 2010⁷, there were 1,860 people, 841 households, and 543 families residing in the city. The population density was 1,823.5 inhabitants per square mile (704.1 /km²). There were 954 housing units at an average density of 935.3 per square mile (361.1 /km²). They are 15-20 miles from the nearest "urbanized area," Parkersburg, WV.

When informed that they would now be considered urban, the Technology Director, Gary Bills was in shock. "We only have one McDonalds. Trees probably outnumber people 10,000+ to 1. Is a picture worth a thousand words? I could video the area driving around the entire city. It would only take about 10 minutes to cover everything. We have an active train track that runs down the center of our main street."

What does all of this mean for Pleasants County? In addition to funding lost in phase down of voice, Pleasants County will experience a drop in discount percentages moving from the rural to the urban side of the discount matrix. They move from a 70% discount to a 60%. When applied to costs requested in Funding Year 2014 (without phase down considered), Pleasants County will lose almost an additional \$30,000 per year in E-rate funding.

⁷ "[American FactFinder](#)". [United States Census Bureau](#). Retrieved 2013-01-24.

St. Marys, Pleasants County, West Virginia

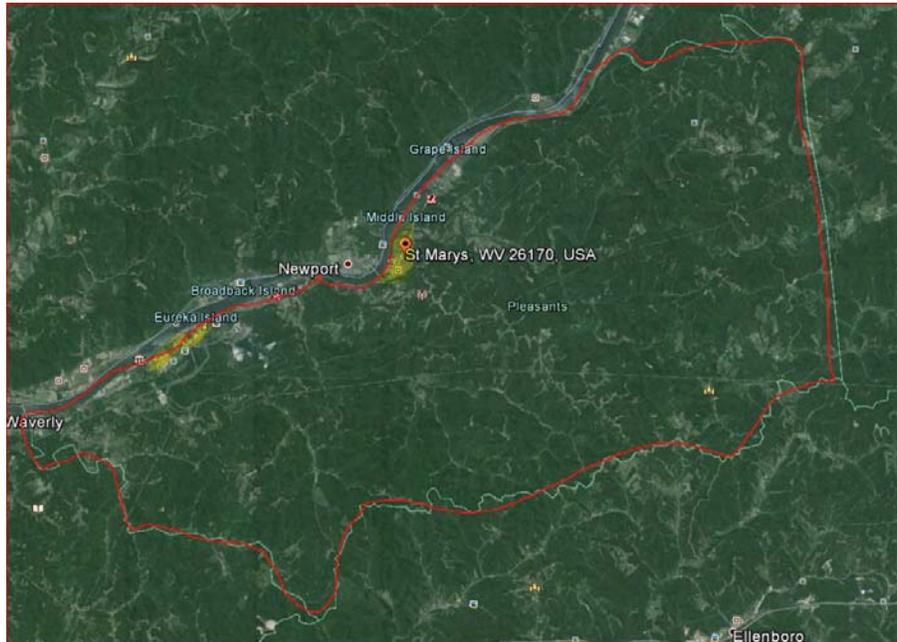


Figure 1: Pleasants County outlined in red. St. Marys highlighted in yellow. This entire county now considered urban based on urban clusters.



Figure 2: Main Street of St. Marys. Note train track through middle of street.



Figure 3: Main Street of St. Marys. Note train track through middle of street.

Grafton, Taylor County, West Virginia

This city (with three stoplights in total) now considered urban has a population of 5,164 in the 2010 census. The population density was 1,407.1 inhabitants per square mile (543.3 /km²). There were 2,512 housing units at an average density of 684.5 per square mile (264.3 /km²).

Along with every school district in West Virginia, Taylor County has experienced a 7% budget cut the past three years. Now, in addition to that funding decrease and voice phase down, Taylor County's budget will take a hit as a newly identified urban district. Based on Funding Year 2014 costs, Taylor County will lose over \$30,000 in E-rate funding from this change. The switch from rural to urban matrices drops Taylor County's former 70% discount to 60%. On July 1, 2015, without intervention from the FCC, this county's costs will skyrocket an additional 10% overnight, while still facing budget cuts.



Figure 4: City of Grafton. Image from Google Maps (<https://www.google.com/maps/place/Grafton,+WV+26354/@39.336555,-80.030068,3a,75y,90t/data=!3m5!1e2!3m3!1s93089626!2e1!3e10!4m2!3m1!1s0x884a89228f0f070b:0x178335413d3f270d!6m1!1e1>)



Figure 5: City of Grafton, WV. Image from Google Maps. (<https://www.google.com/maps/place/Grafton,+WV+26354/@39.336555,-80.030068,3a,75y,90t/data=!3m5!1e2!3m3!1s93089626!2e1!3e10!4m2!3m1!1s0x884a89228f0f070b:0x178335413d3f270d!6m1!1e1>)

Petersburg, Grant County, West Virginia

In order to put this case example in perspective, Petersburg, the county seat of Grant County has a total of two stoplights. As of the census of 2010, there were 2,467 people, 1,113 households, and 614 families residing in the city. The population density was 1,522.8 inhabitants per square mile (588.0 /km²). There were 1,310 housing units at an average density of 808.6 per square mile (312.2 /km²). There were 11,937 people in all of Grant County, 6,366 households, and the population density was 25 inhabitants per square mile. There were 13.3 housing units at an average density of 808.6 per square mile.



Figure 4: Stoplights. Main Street, Petersburg, WV. Image from Google Maps.

According to the E-rate Contact in Grant County, “I don't know what technicalities separate rural from urban, but you don't get too much more "rural" than Grant County in an area with any inhabitants...

Grant County line is probably 40 miles away from the nearest urban areas. Petersburg probably 60 miles away.”

As a district on the cusp of the E-rate discount matrix at 50.46%, Grant County has no wiggle room when it comes to their NSLP percent needy. If they drop, they will go from an 80% district to a 60%.

Hypothetically, they could lose as much as \$25,000. While these amounts may seem minute to some, \$25,000 could purchase 75 students digital tablet devices in order to achieve 1:1. When looking at

losses in the school system, this is one place that can potentially take a hit when decisions have to be made between ensuring students have access to devices versus funding that was previously available.