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**September 18, 2014**

## **Request for Review Appeal Urban Classification**

**CC Docket No. 02-6  
CC Docket No. 96-45**

**Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554**

**To whom it may concern;**

**Appellant Name: Richard Senturia, consultant for applicant.  
Applicant: St. Anthony Grade School, HI  
Applicant BEN #: 112809  
Applicant Form 471#: 944616**

**We are appealing the urban classification for St. Anthony Grade School, 1627 Mill Street #A, Wailuku, Hawaii, 96793-1950 and the subsequent reduction of the discount rate to 40%.**

**We received a letter by email from a PIA reviewer on April 18, 2014. We responded with documentation on May 1, 2014. Finding that the school did not appear in the first wave of funding commitments we resent the response to the reviewer on June 17, 2014.**

**On June 17, 2014 the reviewer replied with a letter indicating that the school should be filed as urban. We immediately responded that the school was in Maui, and copied and pasted the list of rural counties from the USAC website list of Urban/Rural classifications.**

**Again on June 17, 2014 the reviewer responded claiming the following:**

**-This is the information that is on the application:**

**Name:** ST ANTHONY GRADE SCHOOL  
**Address:** 1627 MILL ST # A  
**City:** WAILUKU **State:** HI **Zip:** 96793 1950  
**County:** Honolulu

**It appears that "Honolulu" has been typed into the email response and was not a part of the copied information. It also appears that this is taken from the USAC BEN page for 112809.**

**Entity Number:** 112809

**Entity Name:** ST ANTHONY GRADE SCHOOL

**NCES District Number:** 32614

**Primary Street:** 1627 MILL ST # A

**Primary City:** WAILUKU

**Primary State:** HI

**Primary Zip:** 96793

**Entity Category:** SCHOOL

**SLD Entity Type:**

**Again on June 17, we replied that the school was rural. We copied the website of the school and information from NAC by zip code that indicates as the county Maui.**

**On June 18, 2014 the reviewer indicated that we should change the address on the BEN. We indicated that the address was correct on the BEN.**

**It is possible that the reviewer was confusing this school with BEN 112627 which is also St. Anthony (School Kailua) located in Honolulu.**

**The Funding Commitment Letter was issued on June 25, 2014.**

**We are appealing the classification as urban.**

**Respectfully,**

**John R. Danley, for Richard Senturia, Consultant  
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