

## Educational Reimbursement Policy

### **APPROVED POLICY:**

***All licensee reconfiguration costs must be included in a Request for Planning Funding or Cost Estimate and are subject to negotiation with Nextel and approval by the Transition Administrator (“TA”).***

***Costs associated with 800 MHz reconfiguration educational events meet the TA’s criteria as reasonable and prudent, subject to specific criteria described below.***

### **TYPES OF EVENTS**

1. Educational “Symposiums”/Seminars – dedicated event conducted specifically for the education of affected licensees
2. Conferences/Association meetings – previously scheduled events with significant portion of agenda (50% or more) dedicated to 800 MHz Reconfiguration to educate and share knowledge across affected licensee community

### **CONSIDERATIONS**

Any previously incurred or go-forward education costs must relate to education at events such as conferences or seminars that are specific to the 800 MHz Reconfiguration Program, or have a specific 800 MHz Reconfiguration Program session or sessions with significant FCC or TA participation and presence. These events or substantial agenda components would not have occurred “but for” the need to educate those licensees affected by 800 MHz Reconfiguration.

Where an event host follows this policy, the host of the conference or seminar will be able to inform attendees in advance as to whether the event has been approved by the TA for educational purposes.

TA approval of an event does not constitute a guarantee that a licensee will be reimbursed for all costs associated with the event. As with all reimbursement costs, the licensee and Nextel must agree to cost estimates/actual costs and include such in a Planning Funding Agreement or Reconfiguration Contract. TA approval of an event indicates that licensees attending such events should expect TA approval for reimbursement of reasonable costs associated with the event.

### **TYPES OF COSTS**

In general, all reasonable and prudent costs incurred for 800 MHz Reconfiguration Program educational purposes at approved events will be reimbursable subject to certain limitations regarding the types and amounts of such costs. Types of costs that may be reimbursed include:

- Reasonable travel to and from the event,
- Registration fees, and
- Time spent at the educational event or session.

Where a licensee is eligible for reimbursement, the policy does not assume allowance for repeat attendance by a licensee or member of the licensee’s organization to TA-approved events or for a specific number of attendees to such events. These elements are open to negotiation between the licensee and Nextel based on reasonable considerations for the licensee organization.

To be eligible for reimbursement for attendance at a previously scheduled event (e.g., conference / association meeting), the licensee must demonstrate that the attendee(s) would not attend the event “but for” reconfiguration and the associated educational component. When an approved event is less than 100% devoted to 800 MHz Reconfiguration Program education, then the policy of the TA is to allow for no more than 50% of the expenses (e.g., travel and meals, registration fees) incurred to be eligible for reimbursement. (That is, for TA-approved events, licensees would be eligible for two levels of expense reimbursement – 50% or 100% – based on the proportion of the agenda devoted to 800 MHz Reconfiguration.) If the portion of the event dedicated to 800 MHz Reconfiguration Program education is less than 50% of the total event program, the policy of the TA is to not allow for expense reimbursement.

COST CATEGORY	(DEDICATED) EDUCATION SYMPOSIUM/SEMINAR	CONFERENCE/ASSOCIATION MEETING
Travel and Meals	Reasonable travel expenses to and from the event would be eligible for reimbursement.  Reasonable meal expenses would be eligible for reimbursement.	Subject to the reimbursement levels of 50% or 100%, reasonable meals and travel costs to and from the event would be eligible for reimbursement <i>when the licensee demonstrates that the attendee(s) would not attend the event “but for” reconfiguration.</i>
Registration Fees	Reasonable registration fees would be eligible for reimbursement	Subject to the reimbursement levels of 50% or 100%, reasonable registration fees would be eligible for reimbursement <i>when the licensee demonstrates that the attendee(s) would not attend the event “but for” reconfiguration.</i>
Time	<u>Actual time</u> spent in session (this time will not exceed the time represented on the approved event’s program) would be eligible for reimbursement. Travel time and time spent outside the 800 MHz reconfiguration education sessions would not be eligible for reimbursement.	<u>Actual time</u> spent in session (this time will not exceed the time represented on the approved event’s program) would be eligible for reimbursement. Travel time and time spent outside the 800 MHz reconfiguration education sessions would not be eligible for reimbursement.

## LIMITS

- Actual Costs Only – Only actual costs may be reimbursed. If a licensee receives advance funding for educational costs based on the submission of a Request for Planning Funding (RFPF) or Cost Estimate, there will be a true-up mechanism once actual costs are known.
- Amount of education – The TA will approve only reasonable and prudent educational costs. This means that there are limits as to the amount of educational costs for which a licensee may receive reimbursement. In conducting its review of educational costs, the TA may review the amount of educational costs attributed to any single person within the licensee's organization or the number of individuals within a licensee's organization for which the organization is seeking reimbursement.

## PRE-APPROVAL

To obtain funding or reimbursement for 800 MHz Reconfiguration Program educational expenses, licensees must submit either a Request for Planning Funding (RFPF) or a Cost Estimate following the guidelines outlined in the Reconfiguration Handbook (on the TA's website at [www.800ta.org](http://www.800ta.org)). Failure to follow these guidelines places reimbursement of the incurred costs at risk. The TA and Nextel will require sufficient supporting detail in order to assess the reasonableness of the costs.

## INFORMATION FOR ASSOCIATIONS AND OTHER 800 MHz EDUCATION EVENT HOSTS

Event costs incurred by trade associations or other groups looking to host 800 MHz reconfiguration educational events (collectively "800 MHz Event Hosts") are not reimbursable. Registration fees and sponsorships would be expected to cover such costs.

For future events, 800 MHz Event Hosts should prepare and present a formal "800 MHz Education Proposal" to the TA in advance of the educational event, clearly articulating the expected benefits, invited attendance, registration fees / expected attendee costs (e.g., negotiated lodging rates), and the proposed event agenda. (Where the event is a previously scheduled conference or meeting with a newly added 800 MHz Reconfiguration education component, the Event Host should include the total amount of time scheduled for 800 MHz Reconfiguration Program educational sessions and the proportion that such time bears in relation to the entire event.) Based on this submission, the TA will review and if appropriate, approve the event. The event host will then be able to communicate that the event is a TA-approved 800 MHz Reconfiguration Education Event.

### About the 800 MHz Transition Administrator

800 MHz Transition Administrator, LLC ("TA LLC") is the Transition Administrator ("TA") for the reconfiguration of the 800 MHz band mandated by the Federal Communications Commission ("FCC"). TA LLC has contracted with Deloitte Consulting LLP, Squire Sanders (US) LLP, and Baseline Wireless Services, LLC to perform the duties of the TA. Among its duties, the TA establishes reconfiguration guidelines, specifies replacement channels, reviews reconfiguration cost estimates, monitors payment of reconfiguration costs, manages the relocation schedule, facilitates issue resolution, and administers the alternative dispute resolution process. TA LLC uses information it receives solely for the purposes of administering the 800 MHz reconfiguration process and may disclose such information to the FCC or other authorized parties pursuant to the requirements of the 800 MHz Order or other applicable laws.