October 2, 2018

Federal Communications Commission

Office of the Secretary

445 12th Street, SW

Washington, DC 20554

CC Docket No. 02-6

In the matter of

Pike Amite Walthall Library System

1022 Virginia Ave.  
McComb, MS 39648

BEN: 128717

FRN: 1799108833 SPIN change 92334

Request and Petition Submitted by:

Darlene Morgan, Director

Pike Amite Walthall Library System

1022 Virginia Ave.  
McComb, MS 39648

Request for Review and Petition for Waiver

On April 4th, 2018 Pike-Amite-Walthall Library System filed a SPIN change for FRN 1799108833, to reflect a SPIN change from one AT&T SPIN to a different AT&T SPIN. Pike Amite Walthall Library System (PAWLS) needed to split the FRN, to reflect the migration from the sunsetting AT&T (BellSouth) network that occurred at each PAWLS branch in the summer of 2017 to the current AT&T network. The library needed to change the FRN so that $18,339.65 remained with service provider 143004824 and the remaining $99,501.06 moved to a new FRN under SPIN 143001192.

Instead of splitting the FRN during the SPIN change request, the FRN was changed from 12 months of funding to only one month of funding. The funding was reduced from the original $117,136.80 which would cover 12 months to $9,761.40 which covers only one month. At no point was the library contacted by the SPIN Change reviewer to ask any questions, although the library had indicated on the SPIN change request that both Service Providers (both SPINS) had provided service for the year. It was not immediately obvious to staff that funding had been reduced drastically, since there was the expectation that the FRN would be split and a new FRN with the other 11 months of funding would be created.

When the library realized that there was no additional FRN created, they submitted an appeal for this case. The appeal was created on July 17, 2018 to request that the case be reviewed and funding restored. The appeal was denied on August 4th, because it was past the 60 days. PAWLS reached out to Tammy Jones, State E-rate Coordinator for Mississippi Libraries, for assistance with the appeal. Unfortunately, Ms. Jones was out of the office on medical leave following a surgery and hospitalization in July. She did not return to the office until the end of August to assist with the request for waiver.

Consistent with precedent, PAWLS respectfully asks the Commission to reconsider the denial of our appeal decision and restore badly needed funding to PAWLS by issuing a waiver and allowing this appeal to be considered. This request contains no waste, fraud or abuse, or a failure to adhere to core program requirements, and is consistent with the public interest.

The Pike Amite Walthall Library System (PAWLS) serves three counties in southern Mississippi at nine library locations. The library system runs on a very tight budget and is reliant on the USAC subsidy to keep communications expenses to a sustainable level. It would be detrimental for the library to divert funds away from their normal operating budget to cover this unexpected ISP cost that for which we are normally reimbursed. We respectfully request your help in re-authorizing the $107,375.40 of reimbursement money that we would normally have received if our SPIN change and split FRN had been properly processed.

Respectfully,

Darlene Morgan, Director

Pike-Amite-Walthall Library System