

October 6, 2018

Letter of Appeal
Ms. Marlene H. Dortch
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools and Libraries Universal Service Support Mechanism.
CC Docket No.02-6

In re:
Billed Entity Number:
Appellant: E Rate Solutions Group
Applicant: **United COMMUNITY ACTION Partnership**
Fund Year: 2018 FCC Form 471: 181028707 (category 2)

Dear Ms. Dortch:

This is a "Letter For a Waiver of the time to file for an Appeal of the RFCDL issued on August 5, 2018 Fund Year: 2018 FCC Form 471: 181028707 (category 2) due to various inherent flaws in USAC's EPC system as described in detail in Chairman Pai's April 18, 2017, letter to Chris Henderson of USAC, the USAC EPC ("Epic") Portal system, and USAC as a whole, have "serious flaws." For example:

- There were repeated problems and various outages with the EPC Portal input system, during which users could not access or upload necessary data.
- USAC instituted an arbitrary lock-down of data that prevented the update of filers' account portals.
- Unexplained blocks on the filing of Forms 471 occurred, preventing the necessary filing of forms prior to the close of the filing window, and/or necessitating filing for benefits under an incorrect entity identification.

The Chairman specifically instructed USAC to "identify alternative options to assist applicants even in the event of IT failures." In our case, such IT failures and other numerous problems evident in the USAC system and structure have prevented our responding to PIA inquiries and filing an Appeal by October 5, 2018.

Therefore we are formally requesting a Waiver of the time to file an Appeal of the RFCDL to allow USAC to accept the Category 2 documentation - enclosed which validates the FRNs. The Appeal of the RFCDL was filed only 1 day late and the enclosed information was available to the PIA Reviewer.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in providing requested information which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,

Katherine M. Weiss

Consultant
