**THIS IS A WAIVER REQUEST FOR DENIED INVOICE EXTENSION REQUESTS (CC Docket No. 02-60)**

**Federal Communications Commission**

**Attn: Letter of Appeal**

**445 12th Street SW**

**Washington, DC 20554**

Service Provider Filing the FCC Waiver: Charter Fiberlink CCO, LLC

SPIN: 143027625

Service Provider Primary Contact Information:

David Ventimiglia

13545 Barrett Parkway Dr.

Suite 200

Ballwin, MO, 63021

FRN: 14622131 & 15768411

Applicant:

                BEN: 12707

                Name:  St. Joseph

                Address: 3500 Hoover Rd. Stevens Point, WI 54481

                Contact Name: Jessica F. Hodgkins

                Telephone: 715-342-7799

                E-mail: Jessica.Hodgkins@ascension.org

FCC Form 463 Invoice Number: 1000014490 and 1000032972

USAC Decision in Question:

Invoice Deadline Extension Request Denials received on 8/30/18.

Reason for the Waiver Request:

The customer has done everything as required per program guidelines and should be able to receive all approved funding for FRN 14622131 and 15768411. In order to do so, we ask that a waiver is granted to allow for an invoice extension for the above FRNs to eliminate the unjust financial impact to the applicant given they were approved for FY2016 funding. We have provided all required documentation which supports the statements below. We seek full payment of $8,499.27 on the requested FRNs and an invoice extension so we are able to zero out the balances owed for FY2016.

Despite having provided USAC with thorough explanations to support our invoice extension requests (see attachement 1), our requests have been denied (see attachment 3), however, no prior invoice extensions have been granted.

There is a lack of invoice information available in the USAC RHC Portal regarding the Last Date to Invoice. This makes it impossible to prioritize the Form 463s that were filed following the Funding Commitment Letters (FCL) received. At the time of the FY2015 commitment approvals the FCL was not available on the USAC portal to see the Last Date to Invoice. To date, there is still no Last Date to Invoice readily available on the USAC portal. We must open each individual Form 462 file to see when the invoice deadline is. Due to USAC lack of transparency, Charter Communications was unable to approve the invoice by the Last Date to Invoice. We have brought this to USAC’s and the FCC’s attention several times in a variety of forums yet there is still no resolution or plans for a resolution at this time. In order to do so, we ask that we are granted a waiver to allow for an invoice extension for the above FRNs to recoup these funds from USAC to eliminate the unjust financial impact to the applicant that they were in fact approved for FY2016. In closing, we are trusting the FCC to make the best decision for the health care provider.

Please do not hesitate to reach out regarding any additional documentation needed or any questions you may have in reference to this request.

Attachments:

* Attachment 1: Appeal Invoice 1000032972 Request.docx
* Attachment 2: Email Correspondence Requesting Updates.docx
* Attachment 3: RHC Appeal Decision Letter.docx (Invoice Deadline Extension Request Denial from USAC on 8/30/18)