

January 25, 2019

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

Re: Request for Waiver

Form 471 Filing Deadline for Funding Year 2018

Contact: Stan Wykosky  
Voice: 610-954-9985  
Fax: 610 419-1258  
Email: [stanwykosky@rcn.com](mailto:stanwykosky@rcn.com)

Reference: Form 471 Number 181016595 and Form 471 Number 1971004962; Entity Number 8024,  
Entity – Christian Brothers Academy

Dear Ms. Dortch,

I am writing to request the FCC grant a waiver of the Funding Year 2018 Form 471 deadline so that Christian Brothers Academy's Form 471 E-Rate application will be considered as having been filed within the filing window.

We submitted a Form 471 on March 20, 2018. All requirements were satisfied and all deadlines were met. The application was denied because our school was in a "Red Light" situation.

The "Red Light" referred to a 2007 FRN that was paid. A routine audit of the FRN was conducted. The person that submitted the 471 apparently did not respond to the audit because they were no longer at the school. I do not know why it took 10 years to pursue the recovery of the funds. No one at the school knew anything about the E-Rate applications filed 10 years before the letter to recover the funds. I asked the USAC several times why there was a 10 year delay between the audit and the Recovery letter. I did not receive any type of answer. I requested copies of the letters from 2007 but they could not be provided. I was trying to find out where the letter and/or emails were sent. Recently, the school did return the funds to the USAC and the "Red Light" was lifted.

I contacted the USAC requesting the denied 2018 471 be restarted now that the Red Light was passed. I was informed that that could not be done. My only recourse is to submit a new 471 and then request a waiver to have the 471 be considered as In Window.

I did submit a new 471 but the EPC system will not allow me to submit a 471 for 2018. You must enter 2019 and the service start date must be July 1, 2019 or later. I followed the instructions and tried to explain the situation in the narrative.

The dollar amount of the is significant and is needed by the school. The sequence of events that led to the denial could not be blamed on the USAC or our school. Our school did everything they were supposed to do and met all of the requirements and deadlines. Our application was denied because of a 10 year-old issue. We had no idea the application would be denied. Everyone said that Red Light meant that no action would be taken until the Red Light was cleared.

Not receiving the E-Rate funding will substantially impact the operation budget of Christian Brothers Academy. The students should not suffer because of this unique sequence of events.

I request that the 471 that was submitted in 2019 be considered as 2018 or that the 471 that was denied in 2018 be reopened. I am also submitting copies of the 471 for 2018 and the 471 submitted now.

Thank you for your consideration of our request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stan Wykosky". The signature is fluid and cursive, with the first name "Stan" being more prominent.

Stan Wykosky  
E-Rate Manager  
Christian Brothers Academy