October 14, 2018

To whom it may concern:

Applicant seeks relief from an error made by the Universal Service Administration Corporation (USAC).

Applicant is a small, rural school district in Arizona. For the 2015 funding year, the applicant’s deadline for filing Form 472’s was set by USAC for September 1, 2017. Therefore, the applicant filed for their BEAR (FORM 472) reimbursement prior to that date.

Most of Arizona is a desert, thousands of miles away from the Atlantic Ocean and the Gulf of Mexico. Yet, USAC had inappropriately extended the filing date for this applicant mistakenly thinking this applicant should have Hurricane Relief. This is not something the applicant requested; they just took note of their filing deadlines and acted appropriately.

Through no fault of the applicant, USAC is now demanding the funds back from the applicant, funds that are due to the applicant. Were it not for the error made by USAC, the applicant would have filed for the reimbursements within the correct time window. However, the applicant had no way to know that USAC had extended their time window in error.

Applicant is requesting a waiver to the FCC’s invoicing deadline rule due to this error by USAC.