**THIS IS A WAIVER REQUEST FOR AN INVOICE EXTENSION OR DENIED SPI PAYMENT**

**(CC Docket No. 02-6)**

**Federal Communications Commission**

**Attn: Letter of Appeal**

**445 12th Street SW**

**Washington, DC 20554**

Service Provider Filing the FCC Waiver: Charter Advanced Services (CA), LLC and Charter Fiberlink CA-CCO, LLC

SPIN: 143037005, 143027616

Service Provider Primary Contact Information:

David Ventimiglia

13545 Barrett Parkway Dr.

Suite 200

Ballwin, MO 63021

FRN: 1699008118, 1699009721

Applicant:

                BEN: 143722

                Name:  RIM OF THE WORLD UNIF SCH DIST

                Address: 27315 N Bay Road, Blue Jay, CA 92317

                Contact Name: Jenny Haberlin

                Telephone: 909-336-2031

                E-mail: jenny\_haberlin@rimsd.k12.ca.us

FCC Form 471 Application Number: 161004326

Reason for the Waiver Request:

Appeals were originally needed because the USAC ruling was not in alignment with the FCC ruling regarding *CC Docket No. 02-6, Order, 22 FCC Rcd 8747, 8750, para. 6 (2007)* which states “…*finding that although a transmission route to serve an eligible entity passed through an ineligible entity, the service was eligible because the ineligible entity did not use any of the discounted service.”* We filed the appeal (see attachments 1 & 2) in good faith and were granted said appeal, but were never properly notified about the final decision as the USAC EPC Portal still shows the status as “In Review” (see attachment 3).

The time frame we were waiting for a decision was not concerning given our past history with the appeal process. We routinely followed up with USAC regarding the status of this appeal. On 10/02/18 when doing an internal audit, we spoke with a USAC representative and discovered that a decision had been made and we were never properly notified despite the “In Review” status reflected on USAC EPC Portal. The USAC representative directed us towards the EPC News Feed, however we did not have visibility to see what they were referencing.

Given all of the issues mentioned above, we would request either payment in full be made or we be given an extension to invoice said outstanding FRN balances. Since the original error was the fault of USAC, we were never properly notified, and USAC system still shows an incorrect status, we would request immediate resolution on this matter with either of the aforementioned solutions as we have remained in full compliance of all rules and regulations. In closing, we are trusting the FCC to make the best decision for the applicant.

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: USAC Appeal - Rim of the World Voice.docx

• Attachment 2: USAC Appeal - Rim of the World WAN.docx

• Attachment 3: EPC Status Screenshot.docx