



David LeNard
Director of Sales

Funding Technology Made Easier

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February 23, 2018

Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

CC Docket No. 02-6

RE: Request for Waiver
Worcester County School District, BEN 126416
Funding Year 2016
Form 471 Application Numbers 161022798
Funding Request Numbers 161022798 and 1699087722
Last Date to Invoice: February 26, 2018

In this Waiver request, Worcester County School District, through its representative, E-Rate Elite Services, Inc. (EES), respectfully requests the Federal Communications Commission (FCC) waive the requirement in section 54.514(b) that USAC may only grant a single invoice deadline extension as permitted due to extraordinary circumstances.¹

Worcester County School District (Worcester) has been involved in a billing dispute with Verizon Maryland, Inc. SPIN 143001401 for over a year regarding these FRN's. The dispute centers around the cutover dates for 16 circuits from Frame Relay Service to 16 MPLS Circuits. Verizon notified Worcester in November 2012 that they would cease providing Frame Relay Service to customers in Maryland on or after June 30, 2015, and that they must migrate off of Frame relay services by that time (see attached.) Verizon presented the MPLS offering to Worcester in March 2015, with assurances to cutover service in a timely manner. Verizon did not complete the final cutover from Frame Relay Service to the MPLS Service until January 2017, yet Verizon continued to bill Worcester for both the Frame Relay Service and MPLS Service at the same time to the same sites in violation of their contract and E-Rate Regulations.

Consistent the contract, and E-Rate Regulations Worcester has paid all amounts they believe are owed to Verizon for services rendered; however, due to the ongoing billing dispute this number has not been finalized or agreed to. Therefore, it is in the public interest to grant this waiver for additional time to submit the final invoices as Worcester County School District continues in good faith negotiations with Verizon Maryland, Inc.

Sincerely,

David LeNard
Director of Sales
Email: dlenard@erateelite.com

¹ 47 CFR § 54.514(b) (directing USAC to grant a 120-day extension of the invoice filing deadline "if it is timely requested"). As amended by FCC 14-99 *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Order and Further Notice of Proposed Rulemaking, para. 240 (2014) (*E-rate Modernization Order*) (Bureau should grant waivers of those rules in extraordinary circumstances).

Verizon
22001 Loudoun County Parkway
G2-2-543
E -9
Ashburn, VA 20147 USA



215-180046

THE BOARD OF ED
OF WORCESTER CO
6270 WORCESTER HWY
NEWARK MD 21841
USA

March 6, 2015

TOM
VINCE

RE: **IMPORTANT NOTICE**
Frame Relay and ATM Service Decommission on or after June 30, 2015
Account Number: 000043239591

Dear Valued Customer:

In November of 21012, the Verizon operating telephone companies¹ notified you that interstate and intrastate Frame Relay and ATM Services were being retired and encouraged customers to begin considering alternatives for their replacement. Verizon is now moving forward to decommission these services. Pending necessary approvals, where required, these products will be discontinued on or after June 30, 2015. As such, all Frame Relay and ATM customers must be migrated off these services by that time.

Verizon encourages you to immediately consider other product options which will help your company/government agency to ultimately do more, communicate better, and innovate more easily than ever before. Some suitable alternatives offered by Verizon include the following:

- **Private IP:** A secure, reliable network-based virtual private network offering the scalability and any-to-any connectivity of IP, allowing you to grow your organization and consolidate applications onto a single infrastructure.
- **Private IP to LTE:** Allows you to route LTE device traffic directly to your private IP networks securely.
- **Ethernet:** Flexible, scalable, redundant technology that can help power productivity and cost control. Ethernet is available in point-to-point, point-to-multipoint and multipoint options with local, national, and extensive international availability

If you have not yet done so, please speak with your Verizon account executive as soon as possible to discuss which service solution can provide you with the most improved capabilities for your company/agency. Verizon is committed to working with you to transition your service as seamlessly as possible.

We value your loyalty to Verizon – and look forward to our continued partnership to realize the benefits and opportunities our advanced technology solutions can offer you.

Sincerely,

Verizon Enterprise Solutions

¹ The Verizon operating telephone companies include: GTE Southwest Incorporated, d/b/a Verizon Southwest, Verizon California Inc., Verizon Delaware LLC, Verizon Florida LLC, Verizon Maryland LLC, Verizon New England Inc., Verizon New Jersey Inc., Verizon New York Inc., Verizon North LLC, Verizon Pennsylvania LLC, Verizon South Inc., Verizon Virginia LLC, Verizon Washington, DC Inc.

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22001 Loudoun County Parkway
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E - 9
Ashburn, VA 20147 USA



205-1198

WORCESTER CO BOARD OF ED
6270 WORCESTER HWY
NEWARK MD 21841

November 30, 2015

RE: IMPORTANT NOTICE
Verizon Frame Relay and ATM Service - Notice of Extension to Service Discontinuance Date

Account Number: 000919086682

Dear Valued Customer:

In November 2012, the Verizon operating telephone companies¹ notified you that interstate and intrastate Frame Relay and ATM Services² (hereafter referred to as the "Service" or "Services") were being discontinued and encouraged you to begin considering alternatives for their replacement. Subsequent communications during March 2015 reiterated Verizon's preparation for discontinuing these Services on or after June 30, 2015. This notice is to inform you that Verizon is extending the date for discontinuance. While the actual discontinuance date for these Services has not yet been determined, Verizon will provide at least ninety (90) days' prior notice of such discontinuance date for the Services.

Many Verizon customers have already migrated their Services to alternative network solutions. Verizon continues to encourage you and all of its customers to migrate these legacy Services to alternative solutions. If you have not already done so, it is essential that you promptly contact your account executive to discuss alternative solutions. It is important that you develop migration plans now and have such plans ready for implementation as soon as possible in preparation for the upcoming discontinuance of these Services.

Suitable alternative solutions offered by Verizon may include:

- **Ethernet:** Flexible, scalable, redundant technology that can help power productivity and cost control. Verizon offers two types of Local Switched Ethernet Services, Ethernet Multi-point Service (EMS) and Ethernet Relay Service (ERS). An Ethernet Virtual Connection (EVC) provides an Ethernet multipoint-to-multipoint virtual connection (EMS) or an Ethernet point-to-point virtual connection (ERS) between customer-designated locations.
- **Private IP:** A secure, reliable network-based virtual private network offering the scalability and any-to-any connectivity of IP, allowing you to grow your organization and consolidate applications onto a single infrastructure.
- **Private IP to LTE:** Allowing you to route LTE device traffic directly to your private IP networks securely.

Verizon is committed to working with you to transition your Service as seamlessly as possible. We value your loyalty and look forward to our continued partnership as you realize the benefits and opportunities offered by our advanced technology solutions.

Sincerely,

Verizon Enterprise Solutions

¹ The Verizon operating telephone companies include: GTE Southwest Incorporated, d/b/a Verizon Southwest, Verizon California Inc., Verizon Delaware LLC, Verizon Florida LLC, Verizon Maryland LLC, Verizon New England Inc., Verizon New Jersey Inc., Verizon New York Inc., Verizon North LLC, Verizon Pennsylvania LLC, Verizon South Inc., Verizon Virginia LLC, Verizon Washington, DC Inc.

² This notice applies only to Verizon ATM and Frame Relay Service provided under Forbearance Agreement, Tariff or Product Guide and does not apply to other ATM and Frame Relay services provided by Verizon or to ATM or Frame Relay services provided by other Verizon entities (e.g., Verizon Business or Verizon Select Services Inc.).

Verizon
22001 Loudoun County Parkway
G2-2-543
E - 9
Ashburn, VA 20147 USA



285-1036

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November 30, 2015

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Account Number: 000043239591

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² This notice applies only to Verizon ATM and Frame Relay Service provided under Forbearance Agreement, Tariff or Product Guide and does not apply to other ATM and Frame Relay services provided by Verizon or to ATM or Frame Relay services provided by other Verizon entities (e.g., Verizon Business or Verizon Select Services Inc.).