



PO Box 2012  
Traverse City, MI 49685

- 
- USF Program Assistance
  - Telecom Expense Management
  - Request for Proposal (RFP) Assistance

February 26, 2018

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> St, SW  
Washington DC 20554

CC Docket No. 02-6

RE: Request for Waiver  
Gwinn Area Community School District, BEN 131729  
Funding Year 2016  
Form 471 #161021299  
Funding Request Number (FRN) 1699044122  
Last Date to Invoice: February 26, 2018

In this Waiver request, Gwinn Area Community School District (Gwinn), through its representative, Telecomp Solutions, LLC, respectfully requests the Federal Communications Commission waive the limit established in 47 C.F.R. section §54.514 (b), which permits applicants only a single one-time extension of the invoicing deadline and to allow for an additional extension for FRN #1699044122.

Background:

- |               |   |
|---------------|---|
| <5/24/2016:   | Service provider, Charter Fiberlink informed Gwinn's technology director that a SPIN change needed to be filed to change the SPIN from 143027605 to 143033155 for 2016 FRN #1699044122. |
| 5/24/2016:    | Technology Director Paul Hill drafted letter and mailed to USAC requesting SPIN change per Charter's directive.   |
| Date unknown: | USAC created SPIN Change Case #118752 via legacy Client Service Bureau case filing system.  |
| Date unknown: | Charter invoiced USAC for two months of services under original SPIN #143027605. Disbursements were authorized totaling \$2483.20.  |
| 12/20/2016:   | Customer Service Case #141476 opened via legacy USAC Client Service Bureau "Submit a Question" system to address SPIN change request (date is estimated).                               |
| 2/6/2017:     | USAC's Client Service Bureau created case #35421 in new Erate Productivity Center (EPC) system to transition case #118752 from legacy Submit a Question system.                         |

- 3/1/2017: USAC's Client Service Bureau created case #38206 in new Erate Productivity Center (EPC) system to transition Case #141476 from legacy Submit a Question system.
- 3/1/2017: USAC's Client Service Bureau mistakenly created SPIN Change case #38208 in new EPC to transition Case #141476 (duplicate case filed in error). This case remains open and "In Review" status.
- 5/31/2017: SPIN Change Request #38206 denied due to the fact that it was a duplicate filing.
- 9/12/2017: New consultant, Telecomp Solutions, sent emails to reviewers of SPIN change Case #38208 to request resolution on SPIN change, and to find out if any additional information was needed.
- 10/16/2017: Charter Fiber confirmed that the FRN #1699044122 can be split between two SPINs (net \$2483.20 7/1/16 – 8/31/16 under SPIN #143027605 and (\$12,416.00 9/1/16 – 6/30/17 under SPIN #143033155)).
- 10/16/2017: Telecomp Solutions emailed reviewers of SPIN Change #38208 to confirm SPIN change request should only apply to 9/1/16 – 6/30/17. Provided details about how SPIN change should be modified.
- 10/16/2017: Telecomp Solutions filed (and was approved for) invoice deadline extension for FRN #1699044122.
- 2/2/2018: Telecomp Solutions opened Client Service Bureau Case #220754 to request that SPIN Change #38208 be escalated due to impending invoicing deadline and the fact that USAC has taken no action since last communication with reviewers on 10/16/2017.
- 2/7/2018: Telecomp Solutions called USAC's Client Service Bureau to request escalation of case #220754. Informed that case has been escalated, and that it is under review in the appropriate USAC department.
- 2/26/2018: Telecomp Solutions called USAC's Client Service Bureau again, noting that Gwinn cannot file additional invoices for FRN #1699044122 until the SPIN change request is resolved.

**SUMMARY:** An outstanding SPIN Change request has remained unresolved for almost a year. Gwinn tried unsuccessfully to address it via letters and Customer Service Cases submitted to USAC. The deadline to file for the balance of eligible reimbursements is today, February 26, 2018, and I am asking for an additional extension to submit an invoice due to the unresolved issues associated with FRN #1699044122.

We appreciate your consideration of this request.

Sincerely,

Lori Leugers (submitted electronically)  
Telecomp Solutions