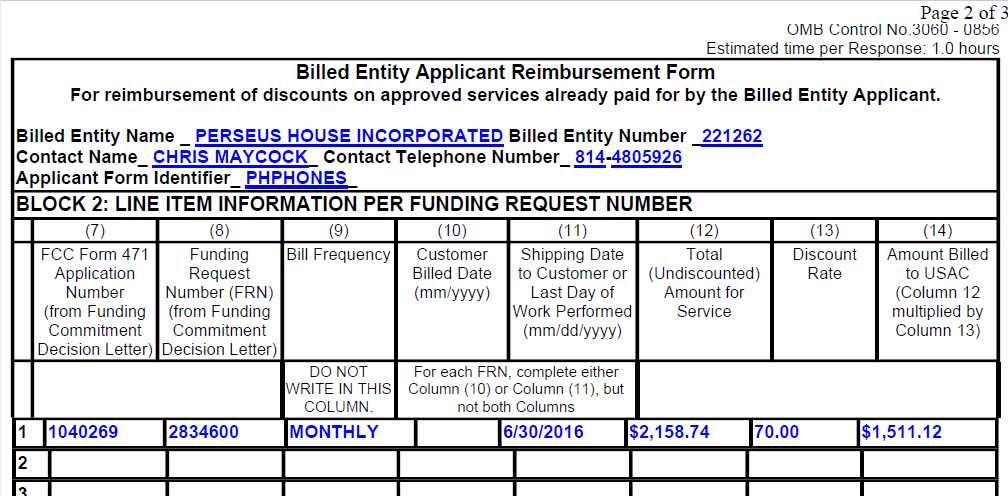
On behalf of Perseus House, Inc., Application No. 1040269, please accept this as either a petition for reconsideration or an application for review by the full commission. Please reference proceeding *CC Docket No. 02-*06, DA 17-928 dated September 29, 2017. The outcome was for “*Dismissed on Reconsideration.”*

In order to provide a complete picture of the situation that is the subject matter of the present proceeding, it is necessary to start with the USAC funding commitment letter dated August 15, 2015. See copy of the relevant portion attached for FRN 2834600. As you can see, it approved Perseus House for Universal Service Support in the amount of $26,071.84 for the one-year period of July 1, 2015 through June 30, 2016. After applying the appropriate discount percentage, the funding commitment letter noted: “Funding Commitment Decision: $18,133.42—FRN approved as submitted.” Perseus House was pleased with the approval and believed it to be correct.

The present problem arose from the subsequent filing of the Form 472 “Billed Entity Applicant Reimbursement Form.” I filed the Form 472 in a timely manner. See complete copy attached. However, in preparing the form, after putting in that the bill frequency was monthly on Block 2 Line item 9**,**  I accidently copied the figure for only one month of service into Block 2 Line 12 instead of the figure for the full 12 months which had been approved by USAC. The mistaken figure in Line 12 then caused the incorrect figure to be populated into Block 2 Line 14. An excerpt with the relevant entries appears below.



Our last date to file for this FRN was February 27, 2017. I was scheduled for surgery on December 8, 2016 and knew I would be away from work for the time period covering the invoicing Form 472 (BEAR), so I made sure to get everything filed before my medical leave. I filed the form 472 for FRN 2834600 on December 1, 2016 and, as indicated above, in making sure all invoicing was complete before my medical leave I inadvertently put in the incorrect figure based on only one month rather than the full year that had been approved.

The reimbursement funding based on the erroneous one-month figure was direct-deposited from USAC sometime later in December. I did not immediately become aware of the situation because I was not able to return to work until the end of April. There was no one to follow up because the BEAR had been filed, they thought the process was finished. When I returned to work and started to review and follow up on all of the E-Rate process, making sure everything was finalized from the prior year, I discovered the mistaken invoice for only one month of funding instead of the full 12 months we were approved for. Had I been working I would have followed up on the process throughout, and would have realized the error and taken steps to take care of it immediately, however I was out on sick leave and was unable to do so. I called the USAC helpline to find out how to invoice for the missing funds. They confirmed my mistake but told me I would have to file an appeal with the FCC as it was past time to file a deadline extension through the Schools and Libraries.

Please reconsider the decision and allow me on behalf of Perseus House to submit an invoice for the remainder of the funding for which we were approved. We have always received full funding through the E-Rate program and this drastic reduction will burden our school tremendously. I understand that the commission has some flexibility to excuse missed deadlines in special circumstances. I would respectfully submit that the combination of **1.** the prior USAC funding approval for the full year, **2.** the inadvertent entry of the monthly rather than yearly figure in Form 472, and **3.** my need to be off work due to medical reasons combine to qualify as a special circumstance warranting relief. Perseus House therefore requests an extension to the invoicing period so that it may receive its full funding for the 2015-2016 year. To the extent this request would require the waiver of any rule, I would ask the commission to do so.

Respectfully,

Karen Wargo

Desktop Support

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