

**Basis for Waiver Request:**

USAC declared the school's Form 472 request (submitted within the program window/deadline) was denied and declared outside the submission deadline. The school submitted (11/13/2018) a Form 472 to receive reimbursement of eligible voice services from Jive Communications for Funding Year 2017-2018 prior to the program deadline assigned for the FRN (2/26/2019). A program reviewer replied and sent the school a service certification ON 11/19/18 with a due date of 11/26/18. The requested documents were returned to the reviewer on 11/19/19. The school received no response to the request for over 60 days and contacted the USAC help desk to obtain a status. The resolve of the call was an internal escalation of the request on 1/23/2019. On 2/26/2019 with the impending deadline and still receiving no communication from USAC, the school once again contacted the help desk for a status. On 2/27/2019 the school received a request for a Service Certification from USAC for which the school responded with on 2/28/2019. On 3/1/2019 the school was notified the clerical error was made regarding the funding year and re-submitted the Form 472 the same day. Finally on 3/4/2019 the school was notified the submission deadline had past, therefore the request was now denied.

**Issue Outline:**

The school submitted an Invoice Extension Deadline on 10/26/18 and received approval. This officially moved the deadline to 2/26/2019. (DOC #1)

A funding year 2017-2018 form 472 (sld inv 2916492) was submitted and certified on 11/13/2018 for this FRN, well within the program period for the last date to invoice for the relevant FRN. (DOC # 2)

A program reviewer replied and sent the school a service certification ON 11/19/18 with a due date of 11/26/18. The request was returned to the reviewer on 11/19/19. (DOC #3A, 3B, 3C, 3D).

After 60 days of submission it was noted that this request was still open since the school received no correspondence regarding this form 472. A call was made to the help desk ON 1/23/19 to request the Form 472 be escalated for processing. The help desk acknowledged that escalation would be requested, help desk case # 262511. (DOC #4)

On 2/27/19 we received another Service Certification request from USAC for the same Form 472 (note this was one day beyond the 2/26/19 deadline). A response was submitted back on 2/28/19. (DOC #5). Note these were the same documents as (Doc#3A-3C and 5C).

On 3/1/2019 the school was notified the incorrect funding year was identified on the Form 472 submission. The school replied by re-submitting the Form 472 with the correct funding year identified. (Doc#6A & 6B)

On 3/4/2019 the school was notified the deadline (2/26/2019) to submit the Form 472 had lapsed. (DOC#7)

**Expected Resolution:**

The FCC will agree with the school that due to extensive processing time (over 4 months) for this request the school is not at fault for the missed deadline. The school does acknowledge the form was initially submitted with the incorrect funding year due to a clerical error. However, the school should not be penalized because it took several (4) four months for the form to be processed and reviewed. This seems to be well outside the normal processing time required for this type of submission (based upon previous similar requests by the school).

Perhaps a contributing factor to the processing delay was caused by the USAC SLD program change-over to a new contractor handling these type of transactions.

The school is requesting that the FCC approve this waiver for this Form 472 request in regards to the Invoice Filing Deadline so as the school can receive reimbursement for the eligible services in support of education and safety. Had the school been notified in a reasonable time-frame (prior to deadline) there would have been ample time to either re-submit the request or at least an opportunity to rectify the issue within the program deadline.