

E-rate CONNECT
3381 Poteat Court
Winston-Salem, NC 27106
828.384.8460
hhosey@erateconnect.com

January 28, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

CC Docket No. 02-6
CC Docket No. 96-45

Re: Request for Waiver of the Invoice Deadline Extension Request Deadline
To Whom It May Concern:

This Request for Review is filed on behalf of the applicant. My letter of agency is attached. My contact information is as follows:

Filer:

Heather Hosey, Senior Compliance Analyst
E-rate CONNECT
3381 Poteat Court
Winston-Salem, NC 27106
hhosey@erateconnect.com
828.384.8460

Applicant:

Adam Kennedy, Director of Technology
Florence County School District 5
156 E. Marion Street
Johnsonville, SC 29555
akennedy@fsd5.org
843.386.2358

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Consistent with Precedent (DA 12-84), this request for review requests that the FCC waive the "Invoice Deadline Extension Request" denied for Form 471 Application Number 161044333 and 161055881, so that the District might retrieve this important funding- funding which the District was eligible for, and successfully applied for, before suffering ministerial staff collapse.

Regarding:

Administrator's Decision on Invoice Deadline Extension Request:

Date of Letter

Applicant Florence County School District 5

Billed Entity Number 127200

Form 471 Application Number 161044333 and 161055881

Funding Request Numbers 1699098286, 1699129395, 1699129681

The **Explanation for Denial** given "Administrator's Decision on Invoice Deadline Extension Request" is:

"Current guidelines and procedures require Invoice Deadline Extension requests to be filed by the last date to invoice. The extension request was not filed in a timely manner, so it is denied."

Grounds for Appeal

After careful review, it was determined that it was not possible for the applicant to file an invoice deadline extension request by the end of the invoice receipt period because no one in the District was aware that the funding had not been received, nor that an extension to the deadline was required. In our examination of the District's files, it was determined that the departure of the previous Director of Technology and the onboarding of the new Director of Technology allowed for the collapse in filing an extension to the invoicing deadline. The new Director of Technology was not aware of, nor had he ever been trained or educated regarding E-rate upon starting his new role.

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Discussion

The students and teachers of this District have been victimized by an unfortunate series of ministerial and procedural errors due to staff turnover. In January 2019, our firm was retained for the first time by the District to guide their E-rate application process. While preparing them for FY2019 filing we have been back tracking through their records in attempting to determine why in the past, although they have received funding commitments, they have not received funding.

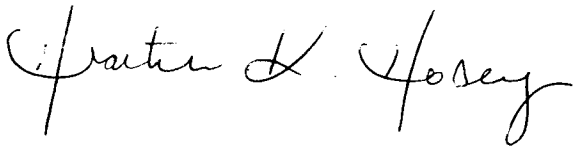
In our review of the District's files we have identified various District employees who have been contacts on one or more forms, in addition, no one who knew anything about E-Rate was in a position to follow any application through to disbursement. In our examination of the District's files, we have found no evidence of any Service Provider outreach in this matter.

The fact is that the District was eligible for this important funding, successfully applied for this funding, timely filed the FCC Form 486 for this funding, and then suffered ministerial staff collapse. We respectfully request that the Invoice Deadline be extended so that this District can claim these important funds. To do otherwise would contribute to unintended consequences of hardship and inequity for the students and teachers in this District.

Closing

We all thank you for your kind attention to this matter. Please contact me if you have any questions or need additional information.

Attachment: Letter of Agency



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Florence County School District Five

PO Box 98 • 156 East Marion Street
Johnsonville, South Carolina 29555

Phone: (843) 386-2358

Fax: (843) 386-3139

January 10, 2019

Schools and Libraries Division
Box 125 – Correspondence Unit
80 South Jefferson Road
Whippany, NJ 07981

To Whom It May Concern:

This letter is to inform you that Florence School District 5 (BEN 127200) has retained Connect The Block (CTB), to advise and assist the District in all matters regarding E-Rate and associated matters effective January 10, 2019, and we hereby authorize you to fully and openly speak and/or correspond with the CTB Analysts listed below regarding all matters before USAC-SLD and/or the FCC:

Heather K. Hosey

Additionally, these analysts will serve as the District's Form 471 Block 1 contact person, and as the District's E-rate contact on any other forms and correspondence requested by the District.

This Letter of Agency will be in effect through January 10, 2020, unless canceled or extended by the District, and covers all District applications for all types of services for any Funding Year.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam W. Kennedy', is written over a large, stylized 'X' mark.

Adam W. Kennedy
Director of Technology

cc: Heather Hosey