

Request for USAC Window Waiver

Proceeding: 02-6 (In the Matter of Schools and Libraries Universal Service Support Mechanism)

Filer (School or District): Bethesda International (part of CLEF Consortium)

Billed Entity Number: 70889 (filed through Consortium BEN 17011656)

Form 471 Application Number: 181041887

Date of Filing Form 471: Sunday, March 25, 2018

Description: Numerous circumstances such as major flaws with USAC's EPC Portal system and other issues prevented filers across the country from filing efficiently and timely, including:

- USAC's EPC Portal input system was inaccessible to filers for unexplained reasons for significant periods of time during the filing window; at one point, USAC representatives themselves stated that even they could not access the portal system;
- The USAC Category 2 Budget Tool(s) provided false data, to wit: the tool that was accessible through the EPC portal system did not account for 2015 funding when calculating the Category 2 Budget, and the tool USAC provided outside the EPC system utilized outdated figures from last year's enrollment in many cases;
- The EPC system was operating so slowly at critical times, including on the last day of the filing window, that efficient filing could not be accomplished;
- USAC failed to announce the inflation adjustments for Category 2 budgets until very late in the filing cycle, preventing filers from making critical application decisions affected by their budgets;
- Numerous areas of the country were affected by severe weather and natural disasters that prevented large numbers of filers from preparing timely filings, including at least two to three very large snowstorms in the northeast of the country, at least two hurricanes affecting many filers in the southeast and gulf region, and severe wildfires in the western region of the country.

Please also note Chairman Pai's April 18, 2017, letter to Chris Henderson of USAC, describing issues and "serious flaws" with the EPC system at least as far back as a year ago. The Chairman specifically instructed USAC to "identify alternative options to assist applicants even in the event of IT failures." In our case, ongoing IT failures throughout the 2017 and 2018 funding years, and other numerous problems evident in the USAC system and structure have prevented our filing of the proper Form 471 prior to the closing of the filing window.

We filed the Form 471 identified in the heading above, on the date identified above. Due to the above problems and many others, we ask that the FCC grant a waiver of the filing window so that the school can obtain funding pursuant to this Application.

A copy of Chairman Pai's April 18, 2017, letter is also attached.