

3/28/2019

**Letter of Appeal – Request for Waiver**

To Whom It May Concern:

Entity & BEN	New Rochelle School District, #123714
Contact Person	Tiffany Bullion
<b>Contact Information</b>	
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Funding Year	2019
Application Type & Application Number	Form 471 Application Number #191041517
FRN	#1999076192
Appeal Reason	EPC System Issues, Ministerial/clerical error
Proceeding No.	02-6

**Appeal Explanation:**

We are requesting a waiver of the E-rate Funding Year 2019-2020 Form 471 deadlines.

New Rochelle School District is part of the Southern Westchester BOCES consortium. E-rate filing is not the primary role of staffers at New Rochelle and the program's complex nature, as well as EPC system issues, delayed the ability to file the district Form 471. The consortium portion of New Rochelle's internet service was correctly submitted through the Southern Westchester BOCES entity # on the deadline of 3/27/19. However, EPC issues and system errors (as described in Chairman Pai's April 18, 2017 letter to Chris Henderson of USAC) occurred when attempting to submit the district portion of internet services under the separate New Rochelle School District entity #. The district Form 471 was only able to be certified a day after the deadline for the following examples:

- Linking districts EPC accounts to consultant EPC accounts is not a seamless process because
- USAC instituted an arbitrary lock-down of data that prevented the update of filers' account portals.
- Repeated problems and various outages with the EPC portal input system, during which users could not access or upload necessary data and forms.
- Unexplained blocks on the filing of Forms 471 occurred, preventing the necessary filing of forms prior to the close of the filing window, and/ or necessitating filing for benefits under an incorrect entity identification.

As such, a late filed Form 471 was submitted to USAC on 3/28/19.

The FCC has historically granted a grace period of Form 471s filed within two weeks of the deadline. We request that the FCC honor this grace period and grant this Form 471 a status of Certified in Window.

Sincerely,

Tiffany Bullion

Director of Operations

E2e exchange, LLC