

3/29/2019

## Letter of Appeal – Request for Waiver

To Whom It May Concern:

Entity & BEN	Belmont Charter Networks, #1702288
Contact Person	Tiffany Bullion
<b>Contact Information</b>	
Mailing Address -	PO Box 451 Syracuse NY 13206
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Funding Year	2019
Application Type & Application Number	Form 471 Application Number #191041614
FRN	#1999076326, #1999076320, #1999076318
Appeal Reason	Misunderstanding of E-Rate program rules; EPC Portal errors
Proceeding No.	02-6

### Appeal Explanation:

We are requesting a waiver of the E-rate Funding Year 2019-2020 Form 470 and Form 471 deadlines.

Belmont Charter Networks was ill informed of program rules that require an entity to post a Form 470 for services for every year the district seeks E-rate support on these items. E-rate filing is not the primary role of staffers at Belmont Charter Networks and the program's complex nature was a hindrance to this applicant's understanding of program rules. The deadline would have been met but additional convoluted EPC portal issues hindered the ability to post the Form 470 until the day after the deadline.

As such, a late filed Form 470 submitted was submitted to USAC on 3/01/19 and a late filed Form 471 was certified on 3/29/19.

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