

April 3, 2018

Letter of Appeal to the FCC  
CC Docket No. 02-6

RE: Appellant: REDWOOD FALLS-MORTON -BELVIEW S D 2897  
BEN: 133895  
Form 471 Application Number: 161042060  
Invoice Numbers: 2719502, 2719484  
FRN Numbers: 1699091996, 1699092003  
Post-Commitment Request Numbers: 84629, 84630  
SPIN: 143002132, 143011537  
Service Provider Names: Redwood County Telephone Company; Rochester Telecom Systems, Inc  
Reimbursement Form Numbers: RASD-2897 P1 POTS FY2016, RASD-2897 P1 FY2016

Dear Sir or Ma'am:

We are filing this correspondence to appeal the decision to deny reimbursement for services requested in the BEAR filings specified above. Our filing was one day late. Last July, I placed a "BEAR Form Deadline" note on October 31<sup>st</sup> on my calendar, with the misunderstanding that 120 days from the last date of service was equivalent to four months. With a busy start to the school year, E-Rate filing work was delayed until October, and continued to be delayed until the end of the month. I filed the forms on October 31st, missing the deadline by one day.

In response to USAC appeal denials due to late filings, the FCC stated in "Request for the Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, New Orleans, LA, *et al.*", in May 2006, that,

"We note that the primary jobs of most of the people filling out these forms include school administrators, technology coordinators and teachers, as opposed to positions dedicated to pursuing federal grants, especially in small school districts...Notably, at this time, there is no evidence of waste, fraud or abuse, misuse of funds, or a failure to adhere to core program requirements...Given that the violation at issue is procedural, not substantive, we find that the complete rejection of each of these applications is not warranted."

I apologize for the late filing and the misunderstanding about the filing window deadlines. Services have already been rendered, and payment for these services has already been made. It would be a hard inconvenience for our district to lose \$5,900 in reimbursement funding. We made in good faith an attempt to seek reimbursement for these services. We file this appeal asking for FCC E-Rate precedence to be maintained and our reimbursement request to be honored and approved.

If you have any further questions or are in need of any further information, please do not hesitate to contact me. Thank you very much for your time and assistance in this matter.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'S' followed by a 'L' and a period.

Stephen Lien  
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