

#232902 - Additional Info for Consideration



REOPEN CASE

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Case Details

Topic	FCC Form 474 - SPI - Other	Form Type	FCC Form 471
Status	Closed	Form Number	161048773 and 161048870
Priority	Medium	Created By	USAC
Inquiry Type	Phone	Created On	4/3/2018 4:02 PM EDT
		Organization	Judy Bright

Case Description

Description Consultant calling on behalf of applicant #131743 regarding several SPI forms.

Case Artifacts

Documents

Name	Uploaded By	Upload Date
Post Commit Request - 85631 - MENOMINEE IS D (1)	Judy Bright	4/3/18 6:14 PM

Attachments

Attachment	Attachment Type
	No items available

Case Thread

User	Note	Date
USAC	Judy, The Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal. Therefore, the appeal was denied. Your next step would be to file an appeal to the FCC within 60 days of your denial from USAC and ask for more time to invoice since you have been approved for the additional 10%. Thank you.	4/3/2018 7:20 PM EDT

User

Note

Date

Judy Bright

I am reaching out one more time to clarify our situation before appealing to the FCC.
1. On 6/9/2017 we originally appealed to USAC #44229 to correct a clerical error where a PIA reviewer changed our status from "rural" to "urban" on our 2016 application causing a 10% reduction in reimbursements. We were subsequently denied on 9/13/17 due to the untimeliness of our appeal and instructed to appeal to the FCC for reclassification, but no mention of including a request to the FCC for an invoice deadline extension as well.
2. On November 3, 2017 we appealed to the FCC for a classification change, which was approved on November 30, 2017 - FCC DA 17-1130.
3. On December 4, 2017 we advised USAC of the approval and USAC advised that we had to wait until an RFCDL was issued to apply for the additional 10% reimbursement. Again we were not advised to request an extension of the invoice deadline date.
4. On February 22, 2018 the RFCDL was issued by USAC - see attached file. In this RFCDL - Column AB - Invoice Deadline Date was blank.

4/3/2018 6:14 PM EDT

Is there really no way that USAC can fix this problem? If we must go to the FCC, what date would you suggest we request as an invoice deadline date as that date becomes a movable object with each appeal.

Thank you for your consideration.

Judy Bright
E-Rate Consultant for
Menominee ISD

The FCC Form 472 BEAR (Billed Entity Applicant Reimbursement) or FCC Form 474 SPI (Service Provider Invoice) for any particular FRN (Funding Request Number) must be submitted no later than 120 days after the later of two dates:

- The last date to receive service for that FRN
- The date of the FCC Form 486 Notification Letter that was issued for that FRN

If you will not be able to meet the deadline, you may file an invoice deadline extension request but it must be received before the invoicing deadline.

Instructions on requesting an extension using the Invoice Deadline Extension Request tool can be found on this page of the Schools and Libraries website:

<http://www.usac.org/sl/applicants/step06/invoice-extensions.aspx>

If you believe you have an extension, you can verify your invoicing deadline by searching for your FRN on the View FRNs with Extended Deadlines tool on the Schools and Libraries website:

http://www.sl.universalservice.org/utilities/FRN_CurFundExt.asp

For information about all program deadlines, please see the Deadlines Tool on the Schools and Libraries website:

<http://www.usac.org/sl/tools/deadlines/Default.aspx>

USAC

4/3/2018 4:06 PM EDT

User	Note	Date
USAC	<p>Judy, FCC rules allow for a single, one-time 120-day extension of the deadline to submit an invoice – FCC Form 472 BEAR or FCC Form 474 SPI - but the request for an extension must have been submitted on or before the current invoicing deadline.</p> <p>If you missed your original or extended invoicing deadline, you may file a waiver request with the FCC to request an extension. Then, if the request is approved, you may invoice.</p> <p>To file a waiver request, please follow the instructions for submitting an FCC appeal on the Schools and Libraries website: http://www.usac.org/about/about/program-integrity/appeals.aspx</p> <p>Thank you.</p>	4/3/2018 4:04 PM EDT

Case Contact

Case Contact Judy Bright