

## II. REQUEST

Webb City R-VII School District respectfully petitions the Commission to request a waiver of the Funding Year 2018 FCC Form 471 filing deadline on behalf of the District to allow the Out of Window submission of their E-Rate Funding Year 2018 FCC Form 471s, due to:

The following explanation has been provided by Mr. Tim White, Director of Technology at the district: "During Spring 2018 E-Rate filing window we found ourselves in the middle of multiple challenges and new variables, complicating the 470 filing process and pulling our attention away during critical time frames. Some of examples of these challenges include suffering a major infrastructure failure in December. Affected systems included our HyperV cluster, which had been overloaded, our Network Access Controller, which allows clients to connect, our Core and Perimeter switching, and our SAN storage which runs the entire server subsystem. Between December and February all of our most important systems suffered damage which required unreasonable levels of attention and reconfiguration work. These challenges came about through various means, in some cases simply being overloaded, in other cases extended power failure or simply aging parts. With limited IT staff and financial resources our team was taxed with a lengthy rebuild process which affected multiple servers and network systems. In addition to taking a majority of our working hours we spent significant overtime hours working through backup plans and alternatives and slowly getting systems back to a point of stability throughout the months of January and February. We finally reached a point of reasonable stability for our students and staff in mid-March after significant investments of time and financial resources. In addition to these challenges our district had plans to acquire a new building which would also affect our needs in filing. Unfortunately, it was unknown until February 14th whether or not this acquisition would take place. Once that acquisition was finalized by our school board and administration we were able to get access to the building and complete a brief assessment to plan for needs which could then be filed on the 470. These things take time and multiple discussions had to take place regarding classroom placements, connectivity needs, device usage, etc. With such a late filing, this complicated the bidding acceptance process further as I would be out of town with my family on spring break with limited time or access to internet during the days when final bids needed to arrive. While I made sure to respond to all inquiries in the process, it was a significant challenge.

April 5, 2018

Letter of Appeal  
Mrs. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**In the Matter of:     Petition for Waiver of  
FCC Form 471 Filing Deadline for Funding Year 2017**

**CC Docket No. 02-6**

Appellant Name:     David Gornstein  
Appellant CRN:     16082747  
Applicant:     Webb City R-VII School District  
BEN:     137300  
              181037514 Filed 4/2/18  
              181042019 Filed 3/27/18  
              181042021 Filed 3/27/18  
Form 471 #s:     181042164 Filed 4/2/18  
                      181042165 Filed 4/3/18  
                      181042232 Filed 4/3/18

Dear Mrs. Dortch,

Webb City R-VII School District is requesting a Waiver of USAC's decision not to fund the above 471 applications: "...USAC has received Webb City R-VII School District's FCC Form 471s – 181037514, 181042019, 181042021, 181042164, 181042165, and 181042232 for Funding Year 2018 on the dates noted above, which was submitted out-of-window. Therefore, your application will not be considered for funding."

## **I. INTRODUCTION AND SUMMARY**

Webb City R-VII School District ("District") submitted and certified their Funding Year 2018 FCC Form 471 #'s 181037514, 181042019, 181042021, 181042164, 181042165, and 181042232, in the "Create FCC Form 471" section of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company's ("USAC") EPC Portal, on March 27<sup>th</sup> through April 3<sup>rd</sup>, just 5 to 12 days after the FCC Form 471 filing deadline of March 22, 2018. See attached acknowledgment pages from EPC.

In following the process, we needed to ensure that all bids had come in and the allowable contract date met before filing acceptances. Some portions of the posting were not even bid until the week that I was out of town and it was quite a challenge to get all of the necessary items and in time to post. Through some very late-night work I was able to submit acceptances of all necessary bids within the time constraint. However, sending acceptance letters to bidders is only the beginning of the 471-filing process and our consultant had much more work to do on our behalf with basically no time to meet the deadline. Each of these factors contributed to unforeseen delays in the filing process and things were simply not finished in time."

### III. SUMMARY:

Webb City R-VII School District respectfully petitions the Commission to grant a waiver of the Funding Year 2018 FCC Form 471 filing deadline and allow the Out of Window submission of their E-Rate Funding Year 2018.

Respectfully submitted,  
For the Applicant,



**David Gornstein**

Consultant  
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