

April 8, 2019

Letter of Appeal

Ms. Marlene H. Dortch  
Federal Communication Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: In the Matter of Request for Review of the Universal Service Administrator, Schools and Libraries Universal Service Support Mechanism.  
FCC Docket No.02-6

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In re:

Billed Entity Number:

Appellant: E Rate Solutions Group

Applicant: Nash Edgecombe Development Inc BEN 16073196

Fund Year: 2019 FCC Form 471: 191041894 (category 2)

Dear Ms. Dortch:

This is a "Letter For a Waiver of the time to file for 471 Apps Fund Year: 2019 FCC Form 471: 191041894 (category 2) due to various inherent flaws in USAC's EPC system as described in detail in Chairman Pai's April 18, 2017, letter to Chris Henderson of USAC, the USAC EPC ("Epic") Portal system, and USAC as a whole, have "serious flaws." For example:

- There were repeated problems/various outages and system delays with the EPC Portal input system, during which users could not access or upload necessary data.
- USAC instituted an arbitrary lock-down of data that prevented the update of filers' account portals.
- 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 with incorrect entity information.

The Chairman specifically instructed USAC to "identify alternative options to assist applicants even in the event of IT failures." In our case, such IT failures and other numerous problems evident in the USAC system and structure have prevented our filing of the proper Form 471 prior to the March 27, 2019, filing window closing

Therefore we are formally requesting a Waiver of the time to file to allow USAC to correct the EPC system error which is preventing the filing of the above referenced form 471's since the applications were filed on April 8, 2019 which is within 14 days of the

March 27, 2019 filing deadline. The FCC has historically granted a grace period of Form 471's filed within 14 days of the filing deadline. We request that the FCC honor this grace period and grant this form 471 a status of Certified in Window.

I believe that the intent of the program is to make sure all eligible schools and libraries receive phone, internet access and internal networking equipment maintenance services as well as internal networking equipment. This school should not be penalized due to any delays in filing their applications which was beyond their control. I sincerely hope that this material will be reviewed and the application reviewed on the information previously provided.

Thank you,

*Katherine M. Weiss*

Consultant

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