

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the Matter of:)	
)	
Request for Waiver)	
)	CC Docket No. 02-6
by)	
)	
Beachwood City School District)	
Beachwood, OH)	

TO: Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

For Erate Funding Year 2019 (“FY2019”) Beachwood City School District (“Beachwood”), filed its Category 1 (“C1”) FCC Form 471 before the deadline, however its FCC Form 471 Application, #191041914 for Category 2 (“C2”) Internal Connections was filed thirteen (13) days after the deadline.

Beachwood respectfully requests that, pursuant to 54.719 through 54.723 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ the Commission grant it a Waiver of the FY2019 Form 471 filing deadline so that Application #191041914 may be considered for funding as though timely filed.

Application Information:	Billed Entity Number:	129491
	FCC Form 471 Application Number:	191041914
	Funding Request Number Affected:	1999076890

¹ 47 C.F.R. §§ 54.719–54.723

Contact Information:

Rosa Kovacevich
Educational Funding Group, Inc.
CRN 16043587
Consultant to Beachwood City School District
26650 Renaissance Parkway, Suite 2
Cleveland, OH 44128
Tel. 216-831-2626
Fax: 216-831-2822
Rosa.Kovacevich@naa.com

STATEMENT IN SUPPORT OF WAIVER

Since the C1 services for which Beachwood applied in FY2019 did not require the posting of a FCC Form 470, Beachwood misconstrued an email from its E-rate consultant, Educational Funding Group, Inc. regarding the need to post a timely FCC Form 470 for the Internal Connections project it sought to undertake. The result of the misunderstanding was that FCC Form 470 #190029694 wasn't posted and certified until 03/07/2019.

Unfortunately, needing to be in compliance with the 28-day waiting period before conducting an evaluation and entering into a legally binding agreement meant missing the FY2019 Form 471 deadline of 03/27/2019. Once the allowable contract date was reached Beachwood conducted an evaluation and went through its vendor selection process; a contract was finalized and signed with CDWG on 04/09/2019 and FCC Form 471 #191041914 was filed that same date.

The Commission has repeatedly reiterated its authority under 47 C.F.R. §1.3 to waive rules for good cause shown and for the past number of years has customarily waived the filing deadline for late filed Forms 471 that were filed within 14 days of the close of the Window. See, Requests For Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science et al CC Docket No. 02-6, Order 25FCC Rcd 9256,9259, para 8 (2010) and more recently, Streamlined

Resolution of Requests Related to Action by the Universal Service Administrative Company, Dated May 31, 2017. Moreover, a waiver of the FY2019 filing deadline would have no adverse effect on the effective administration of the E-rate program.

Since Form 471 #191041914 was filed less than 14 days after the close of the Window, Beachwood respectfully requests the Commission to grant it a Waiver of the FY2019 filing deadline and allow Form 471 #191041914 considered for funding as though timely filed within the Window.

Thank you for your consideration.

Respectfully submitted,

/s/ Linda Schreckinger Sadler

On behalf of Educational Funding Group, Inc.