



April 9, 2019

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Petition for Waiver of Form 471 Deadline for Funding Year 2019
CC Docket No. 02-6
Billed Entity Number: 17021284
Form 471 Application: 191041829
Funding Request Numbers: 1999076716 and 1999076717

Dear Secretary Dortch:

On behalf of ***Storefront Academy Charter Schools – Harlem***, I respectfully submit this petition for a waiver of the filing window deadline to allow the above-referenced Form 471 Application and Funding Request to be moved from being certified out of window to in-window status.

The circumstances surrounding our application submission put our school in a position to submit this request:

- **The need to wait to submit a Form 470 on the last possible day:** As a first-year charter school that is opening in the Fall of 2019, we were still in the throes of negotiations with the leasing facilities for our new building at the time of submitting our Form 470. We had little choice but to wait until the last possible day to file the Form 470 and still be eligible to file our application within window. Even at that time, we did not receive confirmation as to what data drops, network equipment, wireless access points, servers, and a host of other Category 2 eligible equipment would be available to us to use.
- **We hired a new Director of Finance:** We also hired during the time of the application period a new Director of Finance and CFO, which required additional training time with our consultant to discuss all of the compliance requirements with vendor selection to assure that program requirements were met. This created additional time considerations to assure that contracts were properly executed.
- **EPC Portal Lags:** Lags to the system, where it took over 30 minutes to input one contract impelled us to wait until later in the evening, where we presumed that a few hours after business hours in both the East and West Coast time zones would allow us to submit the application at a more rapid pace. Additionally, we experienced a host of issues with attempting to input the FRN Line Items. First, inputting each line item, even at the late hour of ____ PM EST took over 6 minutes each, which with 12 line items, would have taken at least 75 minutes to submit and certify an application, which, even in last year's cycle, would not have taken half as long, as we experienced with our sister school, Storefront Academy Charter Schools – South

Bronx. We experienced several hangs where the EPC portal would simply state that it was “working” on the application for several minutes, which behooved us to try the Bulk Upload option.

- **Bulk Upload Issues:** Yet, when we attempted to use the bulk upload data form, we were unable to secure proper validation for issues beyond our reasonable control. First, the enabling of macros crashed Microsoft Excel at several junctures. Second, the design of the spreadsheet tab labeled “Category 2 Internal Connections” does not allow users to input an option, which then prevented invalidation. Specifically, in Column W: “Do any of these conditions apply?” which requires the user to choose either A, B, or C, the button to choose one of those options abuts the scrolling function of Microsoft Excel itself, rendering choosing any of the options completely impossible. The amount of time lost in attempting to get this bulk upload method required us to submit only 3 FRN line items of the twelve we intended to submit.

To assure that we received at least some E-rate funding, we were forced to submit only a portion of our entire funding request (3 of 12), and secure certification. Given our planned growth over the next 5 years, we determined that our needs dictate that we should file a second Category 2 Form 471 application that completes the entire funding request and includes our request for managed internal broadband services. We did so on April 5, 2019, within 14 days of the Form 471 submission deadline.

Given these circumstances, we respectfully request that the above-referenced Form 471 Application 191041829 for Billed Entity Number 17021284 be changed from being certified out-of-window to being certified in-window. This will allow our school to benefit from the E-rate program as we open our doors for the first time this fall to Kindergarten and first grade students and expand in 5 years to a fully operational K-5 elementary school program.

We graciously rely on your previous precedent in these situations, where the Commission has granted Form 471 deadline waiver requests if the Form was submitted within 14 days of the Form 471 deadline, as noted in your 2010 decision under *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 25 FCC Rcd 9256, 9259, para. 8 (2010) (*Academy of Math and Science Order*). Additionally, in the Bishop Perry Order, the Commission determined that a slight delay in USAC’s receipt of the applications did not warrant complete rejection of the application.

In consideration of the reasons stated above, we respectfully request that the FCC view these extenuating circumstances as sufficient cause to waive the Form 471 deadline for this application. Thank you for your consideration of our request. Please do not hesitate to contact me at erate-harlem@cstorefront.org with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julien Colon".

Julien Colon
Director of Compliance