



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: 16081933
Form 471 Application: 191041469
Funding Request Number: 1999076155

Dear Secretary Dortch:

On behalf of ***Storefront Academy Charter School – South Bronx***, 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 that requires us to submit this request:

- **The need to wait to submit a Form 470 on the last possible day:** As a second-year charter school that may have had to relocate to a new location, 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. We wanted to make sure that the school did not need to relocate and thus require additional internal connections work.
- **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 several hangs where the EPC portal would simply state that it was “working” on the application for several minutes, even after 11:36 PM Eastern Time, when we continued with an application that last year, only required 10 minutes to submit.
- **The PDF generation took at least 10 minutes:** We submitted the application (that we created at 11:36 PM) at approximately 11:53 PM. We received the email for review the pdf at 12:03 AM and certified promptly at 12:04 AM. Thus, our Form 471 was submitted on March 27, 2019



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before the deadline. However, given the continued lag of the EPC portal in generating the PDFs for review and submission, the application itself was not certified until a few minutes after midnight EST on March 28, 2019.

Given these circumstances, we respectfully request that the above-referenced Form 471 Application 191041469 for Billed Entity Number 16081933 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 continue to add grades over the next three years to become 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@cstorefront.org with any questions.

Sincerely,

Julien Colon
Director of Compliance