

April 11, 2019

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

Submitted via ECFS
2 PAGES TOTAL

CC Docket No. 02-6

Request for Waiver

Copan School District (BEN 140055) hereby requests a waiver of the Funding Year 2019 471 filing window for 471 # 191041759 (see information below).

Applicant Name	Billed Entity Number	28 Day Period Met?	471 #	471 Certification Date	Within 14 Days of 471 Filing Deadline?
Copan School District	140055	YES	191041759	4/4/2019	YES

The Federal Communications Commission has established precedent in multiple orders (*Acorn Public Library District Order*¹, *Academy of Math and Science Order*², *Anderson Elementary School Order*³) that applicants who met the 28 day mandatory competitive bidding window, and still filed their 471 applications within 14 days of the 471 filing deadline should be considered as properly submitted.

Copan School District waited the mandatory 28-day competitive bidding period, and their 471 application was filed within a 14 day period after the close of the filing window on March 27^h, 2019.

¹ *Acorn Public Library District Order*, DA 08-2376, Adopted 10/30/2008, para. 5: Establishing that submission of a 471 application within 14 days is a procedural and not substantive violation. “Because the violation at issue is procedural, not substantive, we find that complete rejection of each of these applications is not warranted. Therefore...because the FCC Form 471 was filed within 14 days after the filing window deadline, we find it in the public interest to waive the FCC Form 471 deadline.”

² *Academy of Math & Science Order*, FCC 10-122, Adopted 6/7/2010, para. 9: “...we find that these applications were filed close enough to the deadline so as not to impair the administration of the program.”

³ *Anderson Elementary School Order*, DA 12-796, Adopted 5/22/2012, para. 2: “We grant the 40 waiver requests...because those petitioners applications...were filed shortly after the filing window closed.”

We ask that the Commission waive the filing deadline for the one application listed below and direct the Schools and Libraries Division of the Universal Service Administrative Company to process these applications as “submitted within the window.”

Respectfully,

_____/s/_____

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