

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

In the Matter of:)	
)	
Request for Waiver)	
)	CC Docket No. 02-6
by)	
)	
St. Anselm School)	
Chesterland, 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”) St. Anselm School (“St. Anselm”), filed its Category 1 (“C1”) FCC Form 471 before the deadline, however its FCC Form 471 Application, # 191023822 for Category 2 (“C2”) Internal Connections was filed fourteen (14) days after the deadline.

St. Anselm 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 #191023822 may be considered for funding as though timely filed.

Application Information:	Billed Entity Number:	47403
	FCC Form 471 Application Number:	191023822

¹ 47 C.F.R. §§ 54.719–54.723

Contact Information:

Halle Gerboc
Educational Funding Group, Inc.
CRN 16043587
Consultant to St. Anselm School
26650 Renaissance Parkway, Suite 2
Cleveland, OH 44128
Tel. 216-831-2626
Fax: 216-831-2822
Halle.gerboc@naa.com

STATEMENT IN SUPPORT OF WAIVER

Since the C1 services for which St. Anselm applied in FY2019 did not require the posting of a FCC Form 470, St. Anselm 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 # 190029826 wasn't posted and certified until 03/12/2019.

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 of 04/09/2019 was reached, St. Anselm conducted an evaluation and went through its vendor selection process; terms were finalized with its chosen vendor, CGB Tech Solutions Inc., a contract was signed on 04/10/2019, and FCC Form 471 #191023822 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 #191023822 was filed fourteen (14) days after the close of the Window, St. Anselm respectfully requests the Commission to grant it a Waiver of the FY2019 filing deadline and allow Form 471 #191023822 considered for funding as though timely filed within the Window. Thank you for your consideration.

Respectfully submitted,

/s/ Linda Schreckinger Sadler, Esq.

On behalf of Educational Funding Group, Inc.