

April 16, 2018

SUBMITTED VIA ECFS

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

RE: CC Docket No. 02-6; Request for Waiver

On behalf of Lockhart ISD (BEN: 141719), VST Services, LP hereby requests a waiver of the Funding Year 2018 471 filing window for Application #181042224, certified on April 2, 2018.

The Federal Communications Commission has established precedent in multiple orders 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.¹

In this case, Appellant waited the mandatory 28-day competitive bidding period, and the 471 application was filed within a 14-day period after the close of the filing window on March 22, 2018.

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

Respectfully,

/s/ Russell Neal

Russell Neal, CEMP
VST Services, LP
905 Trophy Club Drive # 202
Trophy Club, TX 76262
682-237-7670
rneal@vstservices.com

ATTACHMENT

¹ See, e.g. *Academy of Math and Science Order*, FCC 10-122, (2010), ¶ 9 (“...we find that these applications were filed close enough to the deadline so as not to impair the administration of the program.”); *Acorn Public Library District Order*, DA 08-2376, (WCB 2008), ¶ 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.”); *Anderson Elementary School Order*, DA 12-796, (WCB 2012) ¶ 2 (“We grant the 40 waiver requests...because those petitioners applications...were filed shortly after the filing window closed.”).

Records / FCC Forms 471

Lockhart ISD C1 2018-2019 Form 471 - #181042224

[Summary](#) [Funding Requests](#) [Review Inquiries](#) [Connectivity Information](#) [Discount Calculation](#) [Entity Information](#) [News](#)[Related Actions](#)

Incomplete

Certified

In Review

Outreach

Wave Ready

Committed

Application Information

Nickname	Lockhart ISD C1 2018-2019 Form 471	Created Date	4/2/2018 5:03 PM EDT
Application Number	181042224	Created By	Tracy Neal
Funding Year	2018	Certified Date	4/2/2018 5:14 PM EDT
Window Status	Out-Of-Window	Certified By	Tracy Neal
Category of Service	Category 1	Last Modified Date	4/2/2018 5:14 PM EDT
		Last Modified By	Tracy Neal

Billed Entity Information

LOCKHART INDEP SCHOOL DISTRICT

105 S COLORADO ST

LOCKHART, TX 78644

512-398-2371

rneal@vstservices.com

Billed Entity Number: 141719

FCC Registration Number: 0001668128

Applicant Type: School District

Consultant Information

There are currently no consulting firms associated with your organization. If this is in error, please update your organization profile.

Contact Information

Name Russell Neal**Phone Number** 682-237-7670**Email** rneal@vstservices.com

Holiday / Summer Contact Information

Contact Information Russell Neal @ RNeal@vstservices.com

FCC Form 471 Generated Documents

FCC Form 471 Version

Original Version