April 13, 2018

Ryan Palmer

Federal Communications Commission (FCC)

Telecommunications Access Policy Division

Wireline Competition Bureau

Dear Mr. Palmer,

Please accept this letter to appeal the decision Council for the Spanish Speaking (dba Centro Hispano Milwaukee) received on April 2, 2018 regarding case number **DA 18-299**, released on March 30, 2018. We believe that the denial of appeal should be reconsidered given the extenuating circumstances that the organization experienced in Fall 2017 which prevented the organization’s vendors from filing invoices timely.

The Council for the Spanish Speaking downsized the organization as part of financial restructuring effective November 30, 2017 resulting in nearly 100 employees being laid off from the early childhood education program that benefited from USAC funds. The main contact, Karina Benitez, was laid off as a part of this decision. All communication regarding our USAC account was going to her. She was the main contact on our USAC account.

This error was identified and Toni Rivera Joachin, President and CEO of the Council for the Spanish Speaking, contacted USAC in December 2017. Due to an error by USAC technicians, that essentially had our account under two different BEN (building entity) numbers, our account was not correctly structured online which prevented us from receiving all necessary account information from USAC. Mr. Cory See, a technician with USAC was able to restructure the account and corrected the errors on January 3 and 4, 2018 where Ms. Rivera Joachin first gained access to the full USAC account. Ms. Rivera Joachin was told and instructed by USAC to contact the FCC and file a waiver to the invoice deadline extension request since deadlines for invoicing had past but within the timeline for a waiver. The request for a waiver was filed on January 10, 2018. The Council for the Spanish Speaking received notice that the request was denied. Ms. Rivera Joachin contacted the FCC and was told the request was denied for insufficient evidence as the attachments accompanying the appeal were not uploaded. Ms. Rivera Joachin was instructed to resubmit an appeal which she did on January 31, 2018 including all documentation and attachments. The Council for the Spanish Speaking received a denial notice on April 2, 2018 of the second waiver. We are providing this letter of appeal to that decision, following the guidelines outlined in the letter provided to the Council for the Spanish Speaking.

While we understand our responsibility to comply with the USAC and FCC guidelines, the cumulation of multiple circumstances, some out of the control of the Council for the Spanish Speaking, resulted in the necessity to request this appeal. We ask that the FCC reconsider its denial decision and allow the vendors to submit invoices for final payment.

Should you have any questions, please feel free to contact Ms. Rivera Joachin at 414-384-3700.

Thank you for your time and consideration. We look forward to a favorable outcome.

Thank you,

Toni Rivera Joachin

President and CEO

Centro Hispano Milwaukee