Docket Number: 02-6

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW,  
Room TW-A325  
Washington, DC 20554

Waiver Request for out of window filing for Omar D Blair School

Application #s 181041783, 181041784, and 181041786

To whom it may concern,

Omar D Blair School is requesting a waiver of the Form 471 filing window deadline for funding year 2018-2019 due to the extremely time-consuming process charter schools must follow to receive services in this program.

The E-rate program allows schools and libraries to receive discounts on eligible goods and services. When the Universal Service Administrative Company (USAC) implemented the EPC Portal, additional criteria for schools was added to their ability to access these funds. Schools had to be classified as independent or a part of a school district to gain access to the EPC portal, which is where applicants complete the processes needed to apply for discounts. These two variations did not leave any consideration for states like Colorado, which have charter schools that operate independent of their district by electing its own board and maintaining its own financial systems. This criterion eliminates the ability for eligible entities in Colorado to apply for E-rate discounts.

In order for charter schools in Colorado to participate in the E-rate program, they must create a consortia account in the EPC system. This process is time consuming because not only is a new entity created, the charter school must be added to the districts portal prior to completing the form 471. Client Service Bureau representatives are not familiar with this process and give applicants a tough time setting up these accounts. Further complicating the matter, Omar D Blair had recently disengaged with its Charter Management Organization, Edison Learning, and additional time was taken to try to disconnect the Omar D Blair School BEN from Edison’s consortium, and to then create a new Omar D Blair consortium that could be connected to the authorizing school district, Denver School District 1. By the time the account was set up, Omar D Blair School had very little time to complete the application process on time.

Omar D Blair School filed three Form 471s (numbers 181041783, 181041784, and 181041786) about 90 minutes after the filing window deadline. These forms were submitted late due to the process required to allow a Colorado charter school access to the EPC portal so they can file for discounts.

We also experienced a problem with the system that did not recognize the consortium member schools, which prevented us from selecting the correct recipient of service. The Colorado State Coordinator had to contact Catriona Ayer and a programmer to fix the system issue so the correct recipient of service was available.

The time it took to work through these issues was longer than expected and pushed the filing of the Form 471 to about an hour past the filing window’s deadline.

Based on the information outlined above, Omar D Blair School is respectfully requesting the waiver of the filing deadline due to the circumstances that were beyond our control.

Please contact our consultant Chris Scott with G&G Consulting Group, LLC to discuss any details of the waiver request at:

2696 S Colorado Blvd, Suite 450

Denver, CO 80222

720-483-8433

[gandgdocuments@gmail.com](mailto:gandgdocuments@gmail.com)

Thank you for your consideration.