Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

**In the Matter of:**

**Naperville Public Library Billed Entity Number: 135707**

**Funding Year: 2019**

**FCC Form 471: 191042144**

**Funding Request Nos. 1999077278**

**CC Docket No. 02-6**

**Waiver of the Rules To Allow a Late Filing of the Form 471 – Schools and Libraries Universal Service – E-Rate Program**

The Naperville Public Library (“Naperville”) is respectfully asking the ("FCC") to allow the USAC-SLD (“SLD”) to treat our late filed Form 471 - filed on April 19, 2019 -- as within the window (See Attachment B). Allowing to do so would allow us to respond to any USAC data requests, and if approved, receive needed discounts for our E-Rate eligible internet access services. In summary, Naperville submits that a series of events out of our control, done to adhere to our own local procurement approval process, did not allow us to respond and complete the application process within the window.

1. BACKGROUND – REASONS

The Naperville Public Library is located in Suburban Chicago, in one of the fastest growing areas of the region. The Library services over 70,000 patrons with a variety of services, including public computing, wireless internet access, document scanning, technology educational programs, and an extensive online catalog. High speed bandwidth is a necessary component of our ability to provide these important services to children, students, adults and our Senior residents.

Although the request for funding (Form 471) was submitted a couple of weeks beyond the window, the delay was a result of caution and due diligence. I began as Information Technology Manager in 2018. This was my first time filing forms with the USAC and FCC. As our organization prepared to open up the bidding process along with Form 470, I made sure to research many possible service providers in the interest of reducing costs and improving service. I was overzealous in comparing contract rates and service offerings, and the library Board of Trustees was unable to approve our AT&T service contract until shortly after the filing window. Please consider this scheduling error as made with the intention of promoting transparency in financial matters to our Board and community.

**CONCLUSION**

For the reasons previously stated, Naperville is respectfully asking the FCC for a Waiver of the Rules to allow the USAC-SLD to treat our FY2019 Form 471 Application filed on April 19 as filed within the window.

Denying Naperville their request would create hardship and prevent it from receiving E-rate funding for services actively used by our serving public. Our efforts were directed at assuring we followed our local procurement practices, in line with overall E-Rate Program rules. We believe that this is in the public’s interest of providing high-speed broadband services to library patrons such as ours.

Accordingly, we believe there is good cause to grant our Waiver of the Rules and allow the USAC-SLD to consider our FY2019 request and allow Naperville to respond to any additional inquiries in support of our funding request.

Please do not hesitate to call or write with any questions or concerns.

Respectfully submitted,

NAPERVILLE PUBLIC LIBRARY

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Date: April 26, 2019

**Attachment A – Funding Year 2019 – Form 470 #19001147**

**Attachment B – Funding Year 2019 – Form 471 # 191042144**