



May 6, 2019

Waiver Request
Federal Communication Commission
445 12th St. SW
Washington, DC 20554

Re: CC Docket No. 02-6

From: John M. Beem Jr.

To Whom it may Concern: MAAC Agency is respectfully requesting a waiver to the invoice deadline for FRN 1799111433.

Entity: 17012375

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Phone Number: 877-748-3447

Email: jbeem@quinn solutions.com

Form 471#: 171048740

Reason for Waiver Request: Invoice Deadline Extension request for the following combination of reasons that have confused and complicated this Form 471 since the FCDL was originally issued.

Funding Request Numbers (FRN): 1799111419

Appeal Information: Invoice Deadline Extension request for the following combination of reasons that complicated the process for the applicant (discussed in detail below):

- 1) **Ongoing, recently resolved and as yet unresolved matters that have left this entire Funding Cycle unreasonably confusing for a first-time applicant.**
 - a) Timeline of Confusing Letters, systems issues, notifications and as yet unresolved appeals
 - i) After an extensive PIA review that included entity eligibility verification and C2 budget reductions for both entities the school received an FCDL on 12/8/2017 approving funding for both of our schools.

- ii) A Form 486 was filed on 12/31/2017 and accepted on 1/19/2018 but then we received an unusual and confusing letter citing yet still unexplained (and non-existent) CIPA violations. A customer service case 217488 opened and we were given an explanation that we did not understand but accepted because we were told it would not affect anything. That explanation was *"As we spoke on the phone regarding the form 486 # 87306 Notification Letter, the organization should not experience any issues regarding the "CIPA Violation" that has been listed for certain FRNs. This field represents the reason a service start date was changed. There have been no changes made to your SSD and therefore this is a system issue that should not cause any issues for your funding requests."*
- iii) On 2/12/2018 we received a "ROS Allocation Mismatch #89596" letter with a new RFCDL. Once again, we called and were told this was a system generated appeal and it would not affect our funding,
- iv) On 2/16/2018 we began the 2018-2019 funding process thinking everything from 2017-2018 is approved and on track.
- v) On 2/27/2018 we received yet another letter this time citing "other issues" so once again, we open a case #225942 and did not really obtain an answer to explain what this meant but nonetheless accepted the response as we were assured it would not affect funding.
- vi) On 3/27/2018 we received an RFCDL with an adjusted commitment amount.
- vii) On 4/6/2018 we refiled the Form 486 based on this new RFCDL
- viii) On 8/2/2018, 8/6/2018 and 8/14/2018 we received COMAD review inquiries asking us to agree that our Charter school is ineligible for E-rate funding (which it is not) with no explanation as to why they are now stating this when during PIA review we verified that it is in fact eligible. As such, we stated "No" we do not agree and attached the Document 1A showing that our Charter School is in fact eligible.
- ix) We never heard anything else after what we thought resolved the eligibility question until on 8/30/2018 when we receive yet another letter adjusting our funding commitment this time a COMAD letter reducing our funding for one of two FRNs associated with this networking project and Form 471 to \$0.00 with the explanation of "Services provided or equipment installed at ineligible entity or facility" which was not accurate and we had verified now twice.
- x) On 10/26/2018 we appealed that COMAD decision.
- xi) On 11/7/2018 we received notice that the appeal was denied for the same reason which we still dispute and could have easily proven if we were ever given the chance beyond those first two opportunities that we still contend had proven our eligibility. In the first line of the denial rationale it even states "After thorough investigation" when in truth the only time we were even involved or given a chance to show our eligibility we have repeatedly done so adequately and even one phone call could have probably cleared this up.

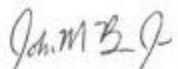
- xii) On 12/6/2018 we appealed to the FCC on this eligibility question. Those appeal ID numbers are 12062005429242 and 120651686165. We have not heard of any movement on these appeals other than them being "DISSEMINATED."

2) BEAR System Issue and a Clerical Error

- a) Minimal Time Remaining, Clerical Errors, and disjointed notifications
 - i) After all the difficulties outlined above in #1 the school (again is a first-time applicant) was left with less than two months to file for the portion of the FRN that was not under appeal and actually did not even realize this was an option. The first BEAR was filed on 1/16/2019 prior to the invoicing deadline but contained a clerical error in which the FRN# listed was another funding request that is also under appeal as described above in 1.a.xii.
 - ii) The first BEAR form was denied due to this clerical error and although the denial was emailed out on 1/21/2019 before the deadline it went only to the Authorizer of the BEAR form and not to the contact person who handles these matters. The Authorizer's SPAM filter filtered the message and it was not discovered until after the deadline had passed.

We are asking that considering the myriad of challenges described above that made it extremely difficult to follow the E-rate funding process particularly for a first-time applicant and considering the second part of this application which was for the same networking project, you grant a one-time waiver for the invoice deadline for this FRN.

Thank you,



John M. Beem Jr.
President
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