To Whom it May Concern:

In July 2016, we began receiving wifi service from DNET.

We had filed all the forms with USAC and been approved, so in October I filed for a BEAR reimbursement for July – through September. It was approved and we received the reimbursement.

On January 1, 2017, our vendor DNET notified us that they were turning all their wi-fi service over to WestNet, a part of BalsamWest FiberNetwork.

On January 5, 2017 I filed a service substitution request with USAC.

On February 2, 2017 USAC turned that request into a SPIN change request.

On March 28, 2017, since USAC had not approved the change and we still hadn’t received reimbursement for October through December wifi service from DNET, I filed a BEAR for those months. The BEAR was not approved because of the SPIN change request that was pending. I don’t know why a SPIN change for services starting in January should prevent a reimbursement for services already received and paid through December - but that is the way your system seems to work.

I periodically checked in with USAC on the status but was pretty much just told they were working on it and nothing further.

In September 2017 I noted that it was getting close to the deadline for filing for reimbursements, and there was still no approval. I asked USAC what to do and they said to file an extension. So I did. I filed an extension that gave me until February 28, 2018. A week later USAC announced that every SPIN change and service substitution that had not been approved because of the EPC system would automatically be extended for a year. Apparently, that did NOT include those of us who were proactive and filed for an extension BEFORE the deadline passed. Because my deadline to file remained at February 28, 2018.

February 28, 2018 came and went and the USAC still had not approved the SPIN change. So I opened a call with them to find out what to do about the deadline. That ticket is still pending USAC review.

Yesterday USAC FINALLY approved the SPIN change – 16 months after I filed it. The documentation says it is approved as of 5/9/2018, but the last day to file for reimbursement is 2/28/2018. So today I tried to file another extension, and was denied. And the USAC website says I have to file for a waiver from the FCC because they can’t waive the rules. Of course, if the EPC system had actually worked, or they had figured out how to approve the SPIN change in the old system, or had bothered to review ANY of my calls prior to this, then I wouldn’t need to file for a waiver, in the first place.

And the best part of all this is – I DID file a BEAR way back in March 2017, but USAC wouldn’t approve it. So I actually was in compliance with your rules, and it did me no good.

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