During the 2017-18 eRate filling window, I had filed the form 470 for the library, 4/4/2017, in a timely manner. I didn't realize that I didn't certify the form until I received an email from USAC stating otherwise. I immediately corrected the mistake and sent in the 470 on 4/20/2017. Because of the mistake it pushed back my filling date for the 471 form to be later than the window allowed.

Process that Lead to waiver request

As a result of my mistake in not certifying the 470 when I originally thought I did, it in turn pushed back the earliest time allowable date to file the 471 form to 5/18/2017, which is 7 days past the filing window. The particular Form 471 was compliant in all other requirements- but not certified on time. They however WERE both filed and certified within 14 days of the certification window 5-18-2017.

Circumstances to Consider –

- Form 471 171048935was certified on 5/18/2017
- Past FCC eRate rulings approving waivers of this nature (14 day ruling)
- The school acted appropriately and in good faith, signing contract within SLD dates for this FRN request. The new C2 funding guidelines simply required the school to take additional measures to confirm eligibilities, and to upload this data in a USAC acceptable format

Past FCC Ruling

FCC
DA 12-1469
September 14, 2012

The Order and Order on Reconsideration reviewed 39 requests from petitioners seeking review of decisions made by USAC under the eRate program. These petitioners were seeking waivers on the Form 471 filing window deadline.

The requests were granted for those schools within 14 days after the filing window deadline.

Justification was sited on past FCC Rules specifically File Nos. SLD-487009, et al., CC Docket No. 02-6, Order, 25 FCC Rcd 9256 (2010) (Academy of Math and Science Order) (finding special circumstances exist to justify granting waiver requests where, for example, petitioners filed their FCC Forms 471 within 14 days after the FCC Form 471 filing window deadline or filed their Form 471 on time, but failed to timely file their certifications); Also, the following order or docket #s: CC Docket NO. 02-6, Order, 26 FCC red 354.