Request for USAC Window Waiver

Proceeding: 02-6 (In the Matter of Schools and Libraries Universal Service Support Mechanism)

Filer (School): St. Rose of Lima (Archdiocese of Miami), Billed Entity Number 36701

Description: As described in detail in Chairman Pai's April 18, 2017, letter to Chris Henderson of USAC, the USAC EPC ("Epic") Portal system, and USAC as a whole, have "serious flaws." For example:

- There were repeated problems with the EPC Portal input system, during which users could not access or upload necessary data.
- Necessary tools, such as the Category 2 (Wi-Fi Equipment) budget tool were repeatedly inaccurate and misleading to filers.
- USAC instituted an arbitrary lock-down of data that prevented the update of filers' account portals.
- Unexplained blocks on the filing of Forms 471 occurred, preventing the necessary filing of forms prior to the close of the filing window, and/or necessitating filing for benefits under an incorrect entity identification (reference USAC Customer Service Cases 177294 and 177343, as a result of which we were instructed by USAC to file Forms 471 using incorrect Billed Entity Numbers).
- Filers faced barriers to filing proper Forms 471 due to incorrect data in the USAC system for enrollment figures and numbers of low income students for schools filing forms.

The Chairman specifically instructed USAC to "identify alternative options to assist applicants even in the event of IT failures." In our case, such IT failures and other numerous problems evident in the USAC system and structure have prevented our filing of the proper Form 471 prior to the May 11, 2017, filing window closing.

We filed a Form 471, Application Number 171049027, on Friday May 19, 2017. Due to the above problems and many others, we ask that the FCC grant a waiver of the filing window so that the school can obtain funding pursuant to this Application.

A copy of Chairman Pai's April 18, 2017, letter is also attached.