

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Petition for Waiver of)	
USAC Funding Rules for Special Construction)	
)	
Somerton School District)	CC Docket No. 02-6
BEN 143007)	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	

Petition for Waiver of
USAC Funding Rules for Special Construction Projects for Funding Year 2017
RE: FCC Form 471 171024718

I. INTRODUCTION AND SUMMARY

The Somerton School District serves low income kindergarten through Grade 8 children in Yuma County, Arizona. Since 1999, Somerton School District has been a small but successful participant of the E-Rate program.

The Somerton School District submitted and certified their Funding Year 2017 FCC Form 471, 171024718, in the “Apply Online” portal of the Schools and Libraries Division (“SLD”) of the Universal Service Administrative Company’s (“USAC”) website, on 5/09/17.

II. Circumstances

Prior to the approval of funding for a special construction project, USAC requires the applicant to guess when the cut over date will be, between the current service provider and the new one.

Of course, since the applicant does not know when the funding approval will occur, this is a total stab in the dark guess. However, USAC will not approve the funding request, until the applicant commits to this stab in the dark request.

Sometime after the stab in the dark guess is made, USAC funds the special construction project. At this time, and only at this time, does the applicant have enough information to provide a realistic cut over date. However, if the cut over date is later than the original stab in the dark request, USAC denies the funding for the incremental months for the current service provider.

This method of funding FCDL's is both capricious and arbitrary, and absolutely unfair to the applicant. It should also be pointed out that the original funding request for the current service provider was for the entire funding year, since it would be ludicrous to guess when the cut over date would be prior to the knowledge of when the funding will occur.

III. Request

The applicant requests that the original funding be restored for FRN 1799052283, funding for the entire funding year, as the cut over date did not occur until the following funding year.

Respectfully submitted,



Frank Vander Horst

E-rate Manager, Yavapai County Education Service Agency, for Somerton School District

10 South 6th Street

Cottonwood, Arizona 86326

928-499-8421

frank.vander.horst@yavapai.us

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