

5/23/2019

## Letter of Appeal – Request for Waiver of Invoice Deadlines

To Whom It May Concern:

Entity & BEN	MULTIPLE BENs – <i>see additional document</i>
Contact Person	Tiffany Bullion
<b>Contact Information</b>	e2e Exchange
Mailing Address -	PO Box 451 Syracuse NY 13206
Phone Number -	315-422-7608
Email Address -	trb@e2eexchange.com
Funding Year	2017
Application Type & Application Number	MULTIPLE APPLICATIONS – <i>see additional document</i>
FRN	MULTIPLE FRNs – <i>see additional document</i>
Appeal Reason	
Proceeding No.	02-6 (Appeal Reason: USAC program/ procedural errors)

### Appeal Explanation:

We are requesting an FCC waiver of the E-rate Funding Year 2017 Invoice Deadline for the FRNs listed on the attached document.

Each applicant filed BEAR invoices well before the original Invoice deadline of 10/28/18. An invoice deadline extension was requested and granted on all FRNs that remained undisbursed as of 10/28/18. Some FRNs were extended to 2/26/19 and others to 5/28/19. In that time, multiple BEAR invoices have been filed and multiple BEAR reviews have been completed on each FRN with no feedback from the assigned USAC reviewers. BEAR Notification Letters are not being sent out to the applicants in a timely fashion, therefore the reason for the BEAR denials are not known. The only ability to check on the status of BEAR invoices at this time is through a customer service case in EPC – which is also not updated in a timely fashion. Please see Case #273084 submitted 2/26/19. A response was received 3/5/19 – all but three FRNs were still “in review” or “escalated”. Please note the dates: the majority of these FRNs were still in the review process prior to the 2/26/19 deadline, and supposedly denied. Case #273084 submitted 4/15/19 and not updated by USAC until 5/13/19, is our first indication of the FRN denials.

As such, BEAR invoices have been submitted and will need to be submitted, in certain cases, after the Invoice Deadline. This is not the fault of the applicant but the result of USAC procedural issues. This is a clear example of what Chairman Pai describes in his April 18, 2017 letter addressed to Chris Henderson as “serious flaws in USAC’s administration of the E-Rate program – flaws that relate to the process by which schools and libraries apply for E-Rate funding and that are preventing many schools and libraries from getting their funding”.

We request that the FCC grant Waivers regarding the invoice deadlines for all the 2017 FRNs identified in this submission.

Sincerely,  
Tiffany Bullion  
Director of Operations  
E2e exchange, LLC