Docket Number: 02-6

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW,  
Room TW-A325  
Washington, DC 20554

Waiver Request for out of window filing for Omar D Blair School

Application # 181042903

To whom it may concern,

Omar D Blair School is requesting a waiver of the Form 471 filing window deadline for funding year 2018-2019 due to both the extremely time consuming process charter schools must follow to receive services in this program, and also to a delay in our chosen contractor receiving their SPIN.

The E-rate program allows schools and libraries to receive discounts on eligible goods and services. When the Universal Service Administrative Company (USAC) implemented the EPC Portal, additional criteria for schools was added to their ability to access these funds. Schools had to be classified as independent or a part of a school district to gain access to the EPC portal, which is where applicants complete the processes needed to apply for discounts. These two variations did not leave any consideration for states like Colorado, which have charter schools that operate independent of their district by electing its own board and maintaining its own financial systems. This criterion eliminates the ability for eligible entities in Colorado to apply for E-rate discounts.

In order for charter schools in Colorado to participate in the E-rate program, they must create a consortia account in the EPC system. This process is time consuming because not only is a new entity created, the charter school must be added to the districts portal prior to completing the form 471. Client Service Bureau representatives are not familiar with this process and give applicants a tough time setting up these accounts. By the time the account was set up, Omar D Blair had very little time to complete the application process on time.

We experienced a problem with the system that did not recognize the consortium member schools, which prevented us from selecting the correct recipient of service. The Colorado State Coordinator had to contact Catriona Ayer and a programmer to fix the system issue so the correct recipient of service was available.

We further experienced a problem with the vendor we choose for the work. We followed USAC’s guidelines for constructing a bid evaluation; the vendor we chose told us during the bid evaluation process that they did indeed have a Service Provider Identification Number (SPIN). During the process of filing the form 471, we were unable to locate their company name in the E-Rate Portal and were thus unable to file the form 471 by the deadline. We communicated with them frequently, first confirming whether their SPIN was listed under a different company name, then providing them guidance on how to acquire a SPIN, then waiting for their SPIN to be approved. We have attached the email correspondence to support our request. We found out after this process that USAC has a dummy SPIN that can be used in cases like this, but this guidance was in no support documentation on the USAC website for filing Form 471. To further complicate matters, the vendor made two mistakes when filing their Form 498, delaying the time it took to assign the SPIN.

Omar D Blair School filed one Form 471 (number 181042903) about two months after the filing window deadline. These forms were submitted late due to the process required to allow a Colorado charter school access to the EPC portal so they can file for discounts. These forms were also submitted late because the vendor we selected based on our adherence to USAC’s guidelines on how to construct a bid evaluation, unbeknownst to us, did not have a SPIN.

The time it took to work through these issues was longer than expected and pushed the filing of the Form 471 to about two months past the filing window’s deadline.

Based on the information outlined above, Omar D Blair School is respectfully requesting the waiver of the filing deadline due to the circumstances that were beyond our control.

Please contact our consultant Chris Scott with G&G Consulting Group, LLC to discuss any details of the waiver request at:

2696 S Colorado Blvd, Suite 450

Denver, CO 80222

720-483-8433

[gandgdocuments@gmail.com](mailto:gandgdocuments@gmail.com)

Thank you for your consideration.