

May 25, 2017

Letter of Appeal – Request for Waiver of Form 471  
Ms. Marlene H. Dortch  
Federal Communications Commission- Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**LETTER OF APPEAL Request for Waiver of Form 471 Deadline – In the Matter of Request for Review of the Universal Services Administrator, School d and Libraries Universal Service Support Mechanism – CC Docket No. 02-6**

Appellant Name: Clifford Friedman on behalf of Kings Kids Academy of Health Sciences  
Applicant Name: Kings Kids Academy of Health Sciences  
Applicant BEN: 16082015  
Form 471: FY2017  
Form 471 Application Number: 171049135

**Request for Waiver**

The current appeal is submitted 5/25/17, in accordance with Sections 54.719 through 54.721 of the Commission's Rules by Clifford Friedman on behalf of Kings Kids Academy of Health Sciences requesting a waiver of the FY2017 Form 471# 171049135 submission deadline.

Due to numerous flaws in the USAC EPC portal, the applicant was not able to submit their form 471 prior to the deadline of 11:59 pm May 11, 2017. As described by FCC Chairman Pai's Letter to Chris Henderson of USAC, the USAC EPC system and USAC have "serious flaws" which prevented the timely submission. For Example, EPC system had various repeated problems locking out applicant from the EPC system, outages of the EPC system, and slow EPC system prevented the applicant from filing and certifying on the deadline date in a timely manner.

The FY2017 Form 471 was filed and certified within 14 days of the May 11, 2017 filing deadline. We are formally requesting a waiver of the time to file the FY 2017 Form 471. The school should not be punished for delays and problems with the EPC system which were beyond their control. Additionally, we request waiver of the filing deadline consistent with the precedent in Academy of Math and Science, FCC 10-122, Rel. July 8, 2010.

Thank you for your consideration of our request.

Respectfully submitted,



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Attachments:

- FCC Chairman Ajit V. Pai Letter Dated April 18, 2017 to Chris Henderson of USAC Re: EPC System Serious Flaws