

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of

Petition for Waiver of  
FCC Form 474 Filing Deadline

Lafayette City-Parish Consolidated Government  
700 St. John Street, Suite 300  
Lafayette, LA 70501  
SPIN: 143025977  
BEN: 139248  
474 Invoice No.: 2936720

CC Docket No. 02-6

Schools and Libraries Universal Service  
Support Mechanism

**Petition for Waiver of  
FCC Form 474 Filing Deadline for Funding Year 2017  
RE: FCC Form 474: 2936720**

**I. INTRODUCTION AND SUMMARY**

Lafayette City-Parish Consolidated Government (“LCPCG”) submitted and certified their Funding Year 2017 Federal Communications Commission (“FCC”) Form 474 – invoice number 2936720 – via the Universal Service Administrative Company’s (“USAC”) Form 474 submittal portal on May 28, 2019. This filing occurred outside of the invoicing deadline prescribed by FCC Rule 47 C.F.R. § 54.514, whereby payment for discounted eligible services must be submitted to the Administrator either 120 days after the last day to receive service or 120 days after the date of the FCC Form 486 Notification Letter, whichever is last. The applicant to which these invoiced services pertain is Lafayette Parish Public Library (“LPPL”), BEN: 139248.

A single staff member of LCPCG handles all matters related to E-Rate, including the application of appropriate credits to customer accounts for approved services and payment invoicing to

USAC. In February 2018, this staff member notified management of his expected retirement date, which was to be one week following his notice. This unexpected retirement resulted in other staff being required to fill the immediate needs of the now vacant position. Management took immediate efforts to fill this position, but was unable to do so until December 2018 due to lack of viable candidates and Civil Service hiring requirements. In the meantime, staff members were instructed to continue crediting amounts to applicant invoices that had already received commitment decisions for this funding year to ensure that the applicant, LPPL, experienced no adverse impact to the services received.

Furthermore, the individuals temporarily filling this role possessed a basic understanding of E-Rate and were unaware of the invoicing deadlines and requirements set forth by the FCC. Since the position previously vacated by the staff member responsible for E-Rate invoicing was filled, the development of standard operating procedures was initiated and is near completion, ensuring that invoicing deadlines are not missed moving forward.

## **II. Request**

**Lafayette City-Parish Consolidated Government** respectfully petitions the Commission to request a waiver of FCC Rule 47 C.F.R. § 54.514 for the Funding Year 2017 FCC Form 474 filing deadline for SPIN Entity: **143025977** to allow the Out-of-Window submission of the E-Rate Funding Year 2017 FCC Form 474 **2936720** to be considered In-Window for USAC to review and approve the invoice per normal processes.

Your favorable consideration in this matter is greatly appreciated. Please feel free to contact me at any time should you have questions.

Respectfully submitted,

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