



FLORIDA DEPARTMENT OF MANAGEMENT SERVICES

**telecommunications**

We serve those who serve Florida

4030 Esplanade Way  
Tallahassee, Florida 32399-0950  
Tel: 850.467-9971 | Fax: 850.922.5142

Rick Scott, Governor

Chad Poppel, Agency Secretary

June 21st, 2016

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

Re: Letter in Support of State E-rate Coordinators' Alliance Petition for Reconsideration of Order DA 16-448, Petition for Waiver and Petition for Rulemaking, CC Docket No. 02-6

Dear Secretary Dortch:

I am writing on behalf of the Florida Department of Management Services in support of the Petition submitted by the State E-rate Coordinators' Alliance (SECA) on May 12, 2016. The SECA Petition asks the FCC's Wireline Competition Bureau to reconsider and grant relief to the more than 100 E-rate stakeholders that missed the invoice deadline and are unable to file reimbursement forms and receive their E-rate funding. Also relief is requested for all other stakeholders in a similar position.

We understand that the FCC tightened the invoice deadline procedures in order to improve program efficiency and to de-commit funds sooner so as to make those funds available for other funding commitments. While efficiency is an important goal, it cannot be the overarching goal that does not also balance the need to be flexible when a ministerial deadline is missed. For the other major forms required to be filed in the E-rate program, such as Forms 470, 471 and 486, the FCC has adopted a more flexible approach that sends reminders to Applicants about upcoming deadlines and provides grace periods for missed deadlines. We hope that the FCC will consider adopting similar measures for the invoice deadline.

Unfortunately, if an Applicant is fully compliant with all other aspects of the E-rate requirements and fails to timely file their invoice or fails to timely request an extension on or before the original invoice deadline, the effect of the current procedures would be to deny any funding to this Applicant. We think that this result is extremely onerous and should not occur.

While the State of Florida was not negatively affected by the invoicing deadline procedure, we hope that the FCC will give serious consideration to the SECA Petition and agree that the Petition raises important and meritorious considerations that are worthy of reconsidering and granting the requested solutions.

Sincerely,

Lyell Walker  
State E-Rate Coordinator  
Florida Department of Management Services